



4 September 2025

Mr Gerard Brody
Chair, Essential Services Commission Victoria
Level 8, 570 Bourke Street,
Melbourne VIC 3000

FROM THE OFFICE
OF THE CHAIR

Level 12
171 Collins Street
Melbourne VIC 3000

Postal Address:
GPO Box 2008
Melbourne VIC 3001

Submitted electronically

Dear Mr Brody,

Consultation Paper – Better protections for life support customers in Victoria

The Information Exchange Committee (IEC) is a statutory body established under the National Electricity Rules responsible for developing and making recommendations on changing electricity business-to-business (B2B) Procedures. The IEC includes representatives from the Australian Energy Market Operator (AEMO), electricity industry retailers and distributors, competitive metering companies, embedded networks and Energy Consumers Australia. The IEC has a statutory role as set out in the National Electricity Rules (NER) (Attachment A).

Noting the significant impact upon B2B Processes, the IEC supports the proposed improvements to the life support processes and offers the following insight into the changes required to implement them and recommends these changes be made effective in November 2027, at the earliest.

The proposed rule change will require changes to B2B transactions and participant systems and processes to ensure that customer information is safely, securely and appropriately recorded.

Communicating a customer's Life Support registration and requirements between participants is done through the B2B Customer and Site Detail Notification (CSDN) Life Support Notification (LSN) transaction.

The proposal will require changes to this transaction to enable retailers and networks to communicate:

- The name and contact information of both the Nominated Contact Person and the Life Support User. Currently only a single, nominated contact is recorded.
- Whether the Life Support User has Critical Life Support Equipment or Assistive Life Support Equipment.
- Whether the Life Support Registration is permanent or requires renewal every four years, and

- Any changes to the list of allowable equipment, particularly if different equipment is eligible for different Critical or Assistive registration types.

In addition, the B2B CSDN transaction does not facilitate sharing the preferred contact method of each person named in relation to the Life Support registration. This would require an additional change to the B2B transaction.

Any changes to the B2B transaction would require consultation under NER 7.17 with appropriate timeframe as required by NER 8.9, approximately 180 business days, followed by appropriate development and implementation time for industry of a further 180 business days.

The implementation will also need to consider the other initiatives in progress in both the gas and electricity industries and consequently, we recommend that the Commission nominate an Effective Date of November 2027 to allow for consultation, development and integration of the changes into the existing schedule of work that industry is undertaking.

The IEC welcomes continued collaboration with the Commission at any stage of its consultations to assist it to understand any potential B2B changes.

Should you wish to discuss this further, please contact the IEC secretariat at

[REDACTED]

Yours sincerely

[REDACTED]

Kee Wong
Chair Information Exchange Committee

Attachment AList of Current Information Exchange Committee Members

Member category	IEC members nominated
Chair	Kee Wong - AEMO director
Distributor	Luke Jenner (Essential Energy)
Retailer	Sean Jennings (Red Energy and Lumo Energy)
Metering	Paul Greenwood (Bluecurrent)
Energy Consumer	Jill Cainey (Energy Consumers Australia)
Discretionary (retailer)	Christophe Bechia (Zen Energy)
Discretionary (Embedded networks)	Marco Bogaers (Executive Director, Metropolis)
Discretionary (distributor)	Vacant

IEC Statutory Role

In fulfilling its statutory role in relation to managing the ongoing development of B2B Procedures and any changes to them, the IEC works collaborative across the different stakeholder groups in the energy sector to:

- Make recommendations on B2B Procedure changes and oversee the consultation process. In conjunction with AEMO, consider implications of potential policy changes which may affect B2B Procedures and contribute to B2B Procedure delivery management and prioritisation.
- Identify B2B Procedure continuous improvement opportunities
- In conjunction with AEMO, monitors and contributes to B2B Procedure delivery management and prioritisation.