

Better Protections for Life Support Customers in Victoria

Submission

3 September 2025

Introduction

As the peak body for disability service providers, National Disability Services (NDS) is committed to the quality and excellence of services provided by its members and to improving the disability service system to ensure it better supports people with disability, their families, and carers, building a more inclusive community. We support robust regulation that drives high quality service provision that is streamlined across jurisdictions and systems.

The Electricity Distribution Resilience Review and the Network Outage Review, conducted in 2021 and 2024 respectively, emphasised the importance of providing more detailed information on the needs of life support customers.

It has been identified that life support registers are currently overly subscribed with many who do not require life support equipment or who have moved residence on the list leading to confusion. The changes outlined will aid responses to a power outage, so that during an emergency, emergency agencies can coordinate emergency response more effectively and distributors can accurately identify residents with critical life support needs.

Rather than answer all the questions raised in the Consultation Paper we would like to raise some issues particularly relevant to the disability sector and people with disability.

Issues

New definitions to provide better life support protections to customers

- Making a distinction between assistive and critical life support seems arbitrary and may cause confusion. If the power supply is affected, the length of time without power may in effect tip some people from assistive to critical.

Registration and medical confirmation processed

- For people with disability, the time period for people to get the form completed is tight. People will need to get access to medical professional and in many cases organise the supports required for the appointment. Once that is done, they will need time to complete the form. This needs to be at least a 3–4-month period.
- There are also associated costs which arise from the above such as the cost of the GP if not bulk billed transport if the GP will not attend at home and the support required.
- The registration form needs to be clear and easy to complete. There will also need multiple avenues to lodgement as access to technology can be a limiting factor for many people
- In order to speed up the process there need to be an efficient process for reconfirmation which is non-confusing and does not require the same steps as registration without the medical confirmation.
- There also needs to be ways to easily transfer information between retailers if people decide to change their supplier. The onus should be on the retailers to facilitate the transferring of this information between service providers.

Changes beyond the scope of this review

- Responsibility for developing the household life support equipment back-up plan should be outlined. This is not necessarily a medical practitioner's role, and the responsibility of the energy retailer, and the type of information provided by whom and in what formats should be detailed.

- Is there an option for people to be offered assistance from other essential and emergency services as needed – e.g. Country Fire Authority, Fire Rescue Victoria. There would need to be a mechanism for people to give consent to be contacted by these agencies.
- Registration form needs to highlight what is not guaranteed with registration such as priority reconnection and a guaranteed power supply.

Conclusion

The 2024 Network Outage Review recommended that the Victorian Government work with the Energy Charter #BetterTogether Life Support Customer Initiative ‘to support and implement in Victoria a national approach to achieve better outcomes for life support customers that meet stronger safeguards for consumer protections’.¹

NDS supports the adoption of the recommendations of the report and the changes proposed in the Consultation Paper are a move in the right direction. Consideration must be given, however to the accessibility of the registration process for those who have special needs and circumstances and the responsibilities of those involved in this process.

Fiona Still
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¹ [Storm and Power Outage Event Independent Review of Transmission and Distribution Businesses Operational Response: Final Report 2024](#). Network Outage Review Expert Panel, State of Victoria, Melbourne, p. 30.