

15 December 2025

Yara Gonzaga
A/Manager Reform (Energy)
Essential Services Commission

Via: [REDACTED]

Dear Yara Gonzaga,

Re: Better Protections for Life Support Customers in Victoria

Thank you for meeting with the Royal Australian College of General Practitioners (RACGP) on 12 August 2025 as part of the consultation by both the Victorian Essential Services Commission (ESC) and the Australian Energy Market Commission (AEMC) (national) regarding *Better Protections for Life Support Customers in Victoria*.

Further consultation was later sought by the ESC with the RACGP Victoria Faculty, specifically relating to alternate possible triaging mechanisms for life support customers during prolonged power outages, noting that Victorian regulation mandates the sharing of life support customer information with emergency services in such circumstances, for such purposes.

Life Support Customer triaging proposals

The RACGP continues to support the proposed two-tier Life Support Customer framework that distinguishes **Critical** versus **Assistive** life support classifications. We consider this option to be the most clinically appropriate and practicable approach for triaging risk during planned and prolonged unplanned power outages and believe this option will improve outcomes for community members who are reliant on life support equipment.

The Critical versus Assistive distinction is equipment- and clinical-risk based and aligns with routine clinical decision-making. It identifies people who require continuous power to sustain life or prevent irreparable harm (Critical) versus those who use energy-powered equipment to support health or wellbeing but who are not immediately life-threatened by short interruptions (Assistive). This approach enables targeted emergency responses and proportionate allocation of limited operational resources while protecting patient safety.

Any triage approach adopted by jurisdictions should provide clear protections for clinicians from unintended medico-legal consequences arising from completing the Medical Confirmation Form which would support their registration as either Critical or Assistive.

Medical Confirmation Form

The RACGP affirms that it is clinically appropriate for Registered Medical Practitioners (GPs and relevant specialists) to complete a standardised Medical Confirmation Form to confirm a patient's reliance on specified life-sustaining equipment and to indicate whether their condition is permanent. Completing the Medical Confirmation Form is part of normal clinical documentation and patient care.

As per the RACGP's comments during the meeting in August, the GP's role in completing the Medical Confirmation Form should be to confirm a patient's clinical need for specified equipment and, where relevant, whether the need is ongoing/permanent. It **should not** require the GP to verify the technical adequacy or



completeness of a patient's Power Outage Plan or ensure that the patient has been assessed for, or has accessed, energy-related concessions, rebates or non-medical supports.

Responsibility for technical advice on backup power, the provision of battery or generator solutions, and assessment of concession entitlement rests with energy providers, emergency services, and appropriate welfare or social services.

The Medical Confirmation Form should:

- be worded in such a manner that does not limit the completion of the form to the Registered Medical Practitioner that has prescribed the life support equipment, therefore enabling GPs and other medical specialists involved in the patient's care to complete the form
- be concise, clinically focused, and minimise administrative burden for GPs and other Registered Medical Practitioners completing it
- explicitly state the area to be completed by the Registered Medical Practitioner
- make clear it does not create new obligations for Registered Medical Practitioners to assess technical, financial or system-level arrangements.

The RACGP kindly requests we be engaged in finalisation of the Medical Confirmation Form and any clinician guidance to ensure clinical clarity and practicability.

Victorian ESC consultation and national alignment

The RACGP notes that the ESC has sought input on triage options and that Victoria's practice of sharing life-support register data with emergency agencies during prolonged outages is unique. We support national alignment of definitions and medical registration processes where feasible.

RACGP recommends that Victoria's triage approach adopt the same Critical versus Assistive definitions used in the national Rule Change to ensure clinical consistency and minimise confusion for practitioners and patients across jurisdictions.

The RACGP welcomes further consultation and collaboration to ensure better protections for life support customers. Please contact Joanne Hereward, Program Manager – Practice Technology and Management, via [REDACTED] if you have any questions or comments regarding this letter.

Yours sincerely

Dr Michael Wright
RACGP President

Dr Anita Munoz
Chair, Victoria Faculty, RACGP