



04 September 2025

Australian Energy Market Commission

Submitted online at: www.aemc.gov.au reference code: RRC0064

Dear Sir / Madam,

Stanwell Submission – Consultation Paper: National Energy Retail Amendment (Improving life support processes) Rule 2025

Stanwell Corporation Limited (Stanwell) appreciates the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) National Retail Amendment (Improving life support processes) Rule 2025 Consultation Paper (the Consultation Paper).

Stanwell is Queensland's leading provider of electricity and energy solutions to the National Electricity Market (NEM), and large energy users along the eastern seaboard of Australia. With over 40 years of continuous operations, Stanwell maintains a reliable supply of power from two of the most efficient and reliable coal-fired power stations in Australia - the Tarong power stations near Kingaroy and Stanwell Power Station near Rockhampton.

Stanwell's experience in working with communities to build, operate and maintain reliable energy generation assets being applied to the shift to renewable energy, as we work on a pipeline of renewable energy and storage projects throughout Queensland.

This submission contains the views of Stanwell only and should not be construed as indicative or representative of the views or policy of the Queensland Government.

Stanwell's feedback to specific consultation questions is provided below.

Question 3: Theme 2: Is there confusion around who may deregister a premise when there is a change in the customer's circumstances?

The current life support registration and deregistration process places obligations on retailers, distribution network providers (DNSPs) and embedded network providers/exempt sellers to initiate actions for life support, thus creating duplication.

The duplication in many respects is due to the discretion available for each party under the National Electricity Retail Rules (NERR) or the Life Support Registration Guide to decide whether to action a registration or deregistration. Given that no one wants to be penalised for getting this wrong, the risk averse approach considered safest for an organisation and a life support customer is to "overdo" the registrations and "underdo" deregistration's.

Duplicative and inaccurate lists for life support will continue to proliferate until there are firm obligations in place and clarity around which party is primarily responsible for that part of the process.

An example is provided below where retailers may err on the side of caution and initiate life support registration process.

- A Commercial and Industrial consumer signs a contract with a new retailer two years before their existing contract ends. The retailer then initiates life support registration processes as soon the contract is signed, even though the retailer will not become the Financially Responsible Market Participant (FRMP) for another two years because under Section 5(1)(b) of the National Electricity Retail Law: "A customer is a person... (b) who **proposes** to purchase energy for premises from a retailer".

Stanwell suggests:

- A review and update of the AER Life Support registration guidelines to clarify deregistration roles, and
 - Inclusion of clear and practical instructions. The consultation paper notes that "wording and interpretation issues have led to confusion between retailers and distributors as to who may deregister a premise."¹
 - The de-registration process be revised, clarifying that responsibility lies with either the Retailer or the Distributor, but not both.

These improvements would prevent similar occurrences and confusion in the future, as noted in the consultation, "addressing these concerns will provide operational clarity, address duplication, and reduce administrative burden for retailers and DNSPs".² Additionally, the current Life Support Guidelines state, that Retailers and Distributors should also co-operate and give all reasonable assistance to each other in relation to their respective obligations under the life support rules.³

Stanwell suggests that, prior to the introduction of the Final Rules an education piece or market participant workshops would be helpful, to ensure a smooth transition to the changes

Question 10: Theme 3: Noting a central database for storing medical confirmations is outside the scope of this rule change process, are there recommendations that could be made to progress the issue?

It is not clear as to why the creation of a central data base that offers a single source of truth, lies outside of the current rule change process. Stanwell believes this would be a viable long-term solution to improve information-sharing among businesses.

This would be especially valuable during natural disasters, when extended power outages may occur. In such circumstances, accurate and accessible information is essential to enable emergency services to identify and prioritise assistance for the most vulnerable

Conclusion:

Stanwell appreciates the opportunity to provide feedback to the consultation paper, in summary:

- Stanwell recognises the critical need for strong protections for customers reliant on life support equipment.
- We commend the AEMC's ongoing efforts to improve regulatory frameworks for life support customer registration and support.
- Stanwell supports strengthening existing mechanisms to enhance consistency, reliability, and effectiveness of protections.
- We advocate for the creation of a centralised database to securely store medical confirmations, providing a single source of truth across the industry.

¹ [Improving life support processes | AEMC](#) p.10

² [Improving life support processes | AEMC](#) p.10

³ [AER Life support registration guide 2021 | Australian Energy Regulator \(AER\)](#) p.9

- Stanwell sees an opportunity for industry to participate in educational workshops prior to the implementation of the Final Rules.

As always, Stanwell welcomes the opportunity to further discuss the matters outlined in this submission. Please don't hesitate to contact Brad Supple via email at [REDACTED]

Yours sincerely

[REDACTED]

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