



Submission to the Australian Energy Market Commission Rule change: Improving life support processes (RRC0064)

1. Overview

COTA Tasmania supports efforts to improve the accuracy, consistency, and clarity of life support processes. We recognise the intent of the rule change proponents and the AEMC's draft determination to reduce confusion and create a more workable system for customers, retailers, distributors, and health professionals. We also welcome the AEMC's indication that core protections remain in place and that the reform is directed at process improvement, not removal of rights.

However, any reform in this area must be tested against one core principle: no household that relies on life support should be made less safe because the system becomes more administratively efficient for industry participants.

COTA Tasmania strongly supports process improvements that reduce duplication and confusion, but we do not support any change that shifts burden, risk or responsibility onto vulnerable consumers, carers, or clinicians.

In our view, the success of this rule change will depend on whether it makes the system easier and safer for consumers in real-world circumstances, including for older people, people with disability, carers, people in regional areas, and people with low digital confidence.

2. About COTA Tasmania

COTA Tasmania (Council on the Ageing Tasmania) is Tasmania's peak body representing older Tasmanians. For more than 60 years, we have been a trusted voice for older people, promoting positive attitudes to ageing, advancing social inclusion, and championing the rights, interests, and value of people as they age.

We provide independent, evidence-based policy and advocacy informed by the lived experience of older people and engagement with stakeholders across government, community services, and industry. Our focus is on improving outcomes for older Tasmanians and supporting ageing as a time of opportunity, contribution, and security.

We collaborate with other peak bodies, national COTA colleagues, and sector partners to challenge ageism and support practical reforms that enable people to age with dignity, independence, and connection in the communities they choose.

3. Why this matters

Life support protections are among the most important consumer safeguards in the energy system. For households that rely on electricity for essential medical equipment, continuity of supply is not a matter of convenience: it is critical to health, safety and, in some circumstances, survival.

The AEMC’s draft determination, released on 5 March 2026, proposes clearer and more standardised processes for registering and managing life support customers, with submissions open until 16 April 2026 and a final decision expected in June 2026. The AEMC has said the draft rule is intended to improve processes while maintaining existing protections, and that around 225,000 households are currently registered for life support protections.

This issue is particularly important in Tasmania. Tasmania has the oldest population in the country, with around 21 per cent of the population aged 65 and over in 2023, and Hobart now the oldest capital city by median age. Older Tasmanians are more likely to live with chronic illness, rely on electrically powered medical devices, manage multiple services and appointments, and in many cases live alone or with limited informal support.

Administrative systems that appear manageable on paper can become high-risk in practice when they depend on repeated forms, digital access, or timely responses from people already under pressure.

4. Summary of recommendations

COTA Tasmania recommends that the AEMC:

- retain the principle that life support protections are a critical consumer safeguard and must not be weakened in practice;
- ensure retailers and distributors remain primarily responsible for the administrative integrity of the system;
- avoid reforms that transfer excessive responsibility to customers, carers, or medical practitioners;
- provide a permanent-condition pathway so people with ongoing or lifelong medical needs are not subject to unnecessary repeat reconfirmation;
- require multiple reminder and contact methods, including phone and post, not digital-only communication;
- ensure no deregistration occurs without repeated and accessible contact attempts and clear escalation safeguards;
- require accessible, plain-language, and low-burden forms and processes;
- preserve protections when a customer changes retailer or moves premises;
- support optional nomination of a trusted secondary contact, while preserving customer autonomy and privacy; and
- require monitoring and public reporting on the consumer impacts of the new arrangements.

5. Detailed comments

5.1 The objective is sound, but consumer safety must remain paramount

COTA Tasmania supports the objective of making life support registration and management processes clearer and more consistent. The AER has also described life support obligations as a “crucial consumer protection” and an enduring compliance and enforcement priority.

That framing is important. This is not a routine customer administration issue. Errors in registration, communication failure, or inappropriate deregistration can have severe consequences. Any new process should therefore be designed from a consumer safety perspective first, with administrative efficiency as a secondary consideration.

5.2 Reform should reduce burden on consumers, not shift it

Consumer organisations have already raised concern that some proposed changes could place additional responsibility and risk onto vulnerable consumers, rather than fixing the internal processes of retailers and distributors. COTA Tasmania shares that concern.

Older people are often expected to navigate increasingly complex systems across health, aged care, income support, insurance, telecommunications, and energy. A well-designed life support process should reduce the number of steps a consumer must take, minimise the need to repeat information, and avoid situations where a person loses protections because of administrative friction rather than any real change in medical need.

The benchmark should be simple: if a process is difficult for an older person who is unwell, fatigued, stressed, digitally excluded, or caring for a partner, it is not a safe process.

5.3 Permanent conditions should not trigger unnecessary reconfirmation cycles

We understand that the reform process has considered updated medical confirmation requirements, including a four-year cycle, alongside possible exemptions for permanent conditions. COTA Tasmania strongly supports an exemption or simplified pathway for permanent or enduring conditions.

For many consumers, the need for life support protections will not change materially over time. Requiring repeated reconfirmation in such cases adds administrative burden for households and clinicians with little safety benefit. It also increases the risk that a person may lose protections because a form was overlooked, delayed, or not understood.

Where a condition is permanent or long-term, the system should allow for ongoing registration unless and until the customer, carer or clinician advises otherwise. If the AEMC retains any reconfirmation requirement, it should be very light-touch, clearly prompted, and backed by strong safeguards against inadvertent deregistration.

5.4 No deregistration without repeated contact attempts and safety safeguards

COTA Tasmania is particularly concerned about any process that could lead to deregistration after failed contact or paperwork lapses. In practice, people may miss calls, letters, or emails for many legitimate reasons: hospitalisation, caring responsibilities, cognitive decline, grief, travel for treatment, regional service gaps, or limited digital access.

For that reason, deregistration should never occur after a narrow or automated process. At minimum, there should be:

- repeated contact attempts over a reasonable period;
- use of multiple channels, including phone and post;
- clear plain-English explanation of consequences;
- an opportunity for a carer, nominee, or secondary contact to assist; and
- a final safety check before protections are removed.

A life support customer should not lose protections because the system failed to reach them in the way they are actually able to respond.

5.5 Communication must be multi-channel, accessible and human-centred

The AEMC has proposed improvements including a standardised medical form, annual retailer check-ins, and notification of a nominated emergency contact for unplanned outages. Those proposals have merit, particularly where they make processes clearer and provide an additional communication safeguard.

However, communication design will be critical. COTA Tasmania urges the AEMC to require that communications:

- are available by phone, post, and digital channels;
- use plain language and clear action prompts;
- are accessible to people with sensory impairment, cognitive impairment, and low literacy;
- allow adequate time for response; and
- make it easy to speak with a real person.

A standard form may assist consistency, but standardisation must not come at the expense of accessibility or flexibility.

5.6 Secondary contacts are useful, but must remain optional and respectful

COTA Tasmania supports the option for consumers to nominate a trusted second contact, particularly for outage communication or where a person may need help responding to administrative requests. This may be especially valuable for older people living alone, people with fluctuating health, or carers managing arrangements on behalf of a family member.

That said, this must remain optional. Not all older people have family nearby or wish to nominate another person. Some may face family conflict, privacy concerns, or coercion risks. The framework should therefore support secondary contacts as a practical safeguard without making them a condition of protection.

5.7 Switching retailers or moving house must not create gaps in protection

Life support protections should follow the customer in a practical and seamless way. Changes of retailer or premises are already stressful and administratively complex. Consumers should not face a fresh risk of delay, loss of status or confusion at exactly the point they are most vulnerable.

COTA Tasmania supports arrangements that improve data accuracy, but the burden of coordinating this should sit with energy businesses, not households. Existing protections should continue while records are being transferred or confirmed, unless there is clear evidence the customer is no longer eligible.

5.8 Retailers should carry the primary responsibility

If the AEMC's intent is to reduce duplication and confusion, then responsibility should sit with the parties best placed to manage systems, records, and compliance.

Energy consumers should not be expected to understand the boundary between retailer and distributor obligations or chase coordination failures between market participants.

Retailers are generally the most direct and ongoing point of contact for customers.

They should therefore carry primary responsibility for customer-facing communications, reminders, and coordination, with clear corresponding obligations on distributors for outage-related protections and notifications. This is more likely to produce accountability that makes sense to consumers.

5.9 The reform should be monitored for real consumer outcomes

COTA Tasmania recommends that the final rule include post-implementation monitoring and public reporting. This should include, at minimum:

- rates of registration and deregistration;
- reasons for deregistration;
- complaints and dispute trends;
- outcomes for customers with permanent conditions;
- accessibility and language issues; and
- any evidence of disproportionate impacts on older consumers, people with disability, carers, CALD communities, and regional households.

Given the seriousness of the risks involved, it is not enough to assume the process works. The sector should be required to demonstrate that it does.

6. Conclusion

COTA Tasmania supports practical reform to improve life support processes, but only where those reforms strengthen consumer safety and reduce burden on households. Life support protections exist because interruption to energy supply can put health and life at risk. That reality must remain the starting point for the final rule.

We therefore urge the AEMC to ensure that:

- the system is simpler for consumers, not just for market participants;
- permanent-condition customers are not exposed to unnecessary reconfirmation burdens;
- deregistration safeguards are strong and human-centred;
- communication is accessible and multi-channel; and
- no consumer is left worse off because of administrative redesign.

For older Tasmanians, especially those managing illness, disability, limited support networks or low digital confidence, these details matter enormously. A safer system will be one that assumes vulnerability can be situational, that mistakes can have serious consequences, and that good regulation must protect people not only in theory, but in practice.