

16 April 2026

Essential Services Commission
Level 8, 570 Bourke Street
Melbourne Victoria 3000

Dear Essential Services Commission,

Re: ESC Draft Decision – Better Protections for Life Support Customers in Victoria

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide feedback on the Essential Services Commission's (ESC) Draft Decision on the Better Protections for Life Support Customers in Victoria consultation (the draft decision).

The RACGP broadly supports measures outlined in the draft decision.

RACGP feedback on earlier consultations on this matter primarily focused on ensuring:

- a distinction is made between **Critical** versus **Assistive** life support users;
- the Medical Confirmation Form is fit for purpose, can be completed by a life support users' general practitioner (GP) and does not place new obligations on Registered Medical Practitioners completing it, and;
- alignment across jurisdictions, noting the concurrent consultation by the Australian Energy Market Commission (AEMC) pertaining to the same matters.

Critical versus Assistive life support user classifications

The RACGP supported the #BetterTogether/Energy Charter proposed distinction between **Critical** versus **Assistive** life support user classifications as a clinically appropriate and practicable approach for triaging risk during planned and prolonged unplanned power outages, and to support targeted emergency responses and proportionate allocation of limited operational resources.

We recognise that whilst the draft decision has not adopted the terms Critical and Assistive to distinguish which life support users 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), the proposed adoption of a 'Life threatening condition' system flag provides a mechanism to distinguish between these customers.

Medical Confirmation Form

The RACGP strongly recommended a life-support users' GP or other medical specialists involved in their care be able to complete the Medical Confirmation Form and not be limited to the Registered Medical Practitioner who prescribed the life support equipment.

We are pleased to see the draft decision supports this.



The RACGP also advocated that in completing the Medical Confirmation Form, no new obligations be placed on the Registered Medical Practitioner to assess technical, financial or system-level arrangements – such as confirming the patient has a power outage back up plan in place, may be eligible for concessions or be entitled to certain protections. These additional obligations were included in the original rule change proposal. We believe that whilst Registered Medical Practitioners can and may wish to have these discussions, the obligation for conveying this information is on the energy provider.

Despite no direct mention of this in the draft decision, we appreciate the clarity provided on the consultation webinar hosted by the ESC on Thursday 19 March that these obligations cannot – and will not – be imposed on Registered Medical Practitioners proving medical confirmation. This will not prevent medical practitioners electing to have these conversations if they are informed and comfortable to do so.

Alignment with other jurisdictions

The RACGP has previously called for national alignment of definitions and medical registration processes where feasible to ensure clinical consistency and minimise confusion for practitioners and patients across jurisdictions – particularly noting the concurrent consultation by the AEMC pertaining to the same matters.

We are pleased the ESC and AEMC have worked closely to develop policies that will minimise differences between jurisdictions and the ESC's acknowledgement that the medical confirmation form would be standardised.

The RACGP welcomes further consultation and collaboration with the ESC, AEMC, and the Australian Energy Regulator on these changes, any clinician guidance to be developed, and the co-development of a standardised Medical Confirmation Form, to ensure clinical clarity and practicability.

Please contact Joanne Hereward, Program Manager – Practice Technology and Management, via joanne.hereward@racgp.org.au if you have any questions or comments regarding the RACGP response or wish to meet and discuss.

Yours sincerely

Dr Michael Wright
RACGP President

Dr Anita Munoz
Chair, Victoria Faculty, RACGP