



Life Support Policy

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Document Owner:	Legal, Compliance & Safety General Manager
Author:	Adrian Mitchell
Approved by:	Board of Directors
Any questions about this document:	Adrian Mitchell Adrian.mitchell@CleanPeakenergy.com
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1 Introduction

1.1 Scope

This policy sets out CleanPeak Energy's commitment to meeting Life Support regulations throughout Australia.

Life Support is where someone at a residence has a medical condition and relies on continuous supply of electricity or gas (not extended to life support equipment fuelled by liquified petroleum gas (LPG)) to run critical medical equipment to ensure the ongoing health and safety of the person. The Life Support equipment is generally electric, but a doctor may authorise gas appliances also.

A customer must advise their retailer or their distributor that they have Life Support equipment at their property to ensure that they are provided with safe and reliable electricity supply.

A customer that is registered for Life Support will receive advanced notification of any planned power outage if necessary for maintenance or upgrades.

However, unplanned outages beyond the distributors control can also occur due to unforeseen circumstances such as traffic accidents or extreme weather.

1.2 Application

This policy applies to CleanPeak Energy Pty Ltd and its subsidiaries, and to the CPE Renewable Investment Unit Trust and the CleanPeak Renewable Transition Trust groups, hereinafter referred to as 'CleanPeak Energy', and all employees, contractors and sub-contractors as appropriate.

2 Life Support Policy (Victoria)

2.1 Life Support Framework

The life support framework for retailers and exempt sellers is contained in Part 2, Division 5C of the *Electricity Industry Act 2000* and Part 4, Division 4AA of the *Gas Industry Act 2001*.

The life support framework for distributors and exempt distributors is set out in Part 5A of the Electricity Distribution Code of Practice and Part 4A of the Gas System Distribution Code of Practice.

Retailers, distributors and exempt persons (whether they be sellers or distributors) are required to keep a register of life support resident and life support customer details for premises where a life support resident or customer resides or is intending to reside.

2.2 Applying for Life Support

Who can apply for Life Support:

- (a) A non-authorized contact can apply on the condition that the form has been completed and signed correctly;
- (b) A customer who uses an eligible life support machines in accordance with subsection 5.1; and
- (c) A customer who has a household member who uses an eligible life support machine.

Customer notification

A customer notification occurs when:

- (a) the customer notifies retailer or distributor that they have Life Support equipment on the premises;
- (b) the distributor / retailer, contacted by the customer, becomes the registration process owner; and
- (c) the registration process owner flags Life Support on the customer's account and notifies the relevant retailer or distributor.

Medical confirmation notification

The registration process owner will need to send the Life Support medical form to the customer along with information around life support.

If the customer returns the medical form within the timeframe (50 business days), we then update the system and notify the Distributor that the medical form has been provided. A customer may request an extension of time to return the medical confirmation form.

If the customer does not return the form within 50 business days, or seek an extension, we must refer the customer notification to a Life Support de-registration process where we need to issue two reminder notices and a scheduled de-registration letter advising the customer of the intended date we have scheduled to remove the Life Support flag from their account and failure in providing the completed form may result in de-registration.

Ongoing retailer obligations (electricity)

Within one business day after receiving relevant information about the life support equipment requirements for the relevant customer's premises (including medical confirmation) or any relevant contact details, give such information to the distributor for the purposes of updating the distributor's registration, unless the relevant information was provided to the retailer by the distributor; and within one business day after being advised by a relevant customer or distributor of any update to the life support equipment requirements for the relevant customer's premises or any relevant contact details, update the register of life support customers and residents.

Within one business day after being advised by a relevant customer or distributor of any update to the life support equipment requirements for the relevant customer's premises or any relevant contact details, update the register of life support customers and residents.

Planned / Unplanned Outages

When a planned outage is scheduled to occur due to any maintenance or upgrades, the customer's distributor will notify the customer in writing ahead of time (minimum of 4 business days).

It is also important that we have the customers updated contact number and details. However, unplanned outages can also occur.

As unplanned outages can occur due to unforeseen circumstances it is important that the customer has a plan of action.

Preparing for a power outage

Whether an outage is planned or unplanned, the distributor will always ensure they make arrangements to ensure the customers power is reconnected as soon as possible. However, the customer is always encouraged to have a plan of action until their supply is reconnected.

- Regularly check the back-up battery of the Life Support equipment to ensure it is fully charged.
- Ensure they have up to date information at hand such as their doctor's name and contact details, friends and family contact details.
- Remembering to call 000 to request an ambulance if their situation is life threatening.
- Ensuring their mobile is charged at all times.
- Subscribing to their Distributors outage notifications.

If the situation is non-life threatening or an ambulance is not required, the customer is encouraged to call their local network distributor's fault line immediately.

Life Support Equipment

Some Victorian customers may be eligible for concession or rebates depending on the life support equipment they use.

Victorian customers will cease to receive a rebate if they are no longer eligible for a concession card. If the customer moves property/changes address, equipment or retailer, they will need to complete and submit the Life support form again to retain their rebate. For more information, please visit Department for Health and Human Services – VIC.

2.3 Life Support Registration/De-registration process

When life support equipment is required at a customer's property

Once a customer has notified us that they require Life Support equipment at their property, we must ensure we take all appropriate steps to have their account flagged as a financially responsible retailer. This is very important and we are obligated to create and maintain accurate records of the registration and de-registration process.

Life Support notification at the Point of Sale

At the point of sale, a customer will be asked if they have any Life Support equipment at their property as a part of Explicit Informed Consent. If the customer advises that their premise has Life Support, the account **MUST** be flagged.

The retailer must identify if the customer's Life Support equipment is fuelled by Electricity and Gas. If CleanPeak is not the retailer for both Electricity and Gas we will advise the customer to contact their other retailer to advise of the Life Support requirement.

The Life support form and important information outlined below will then be issued not long after their welcome pack is issued, which must be completed and returned by the customer within 50 business days.

The Life support flag must then be notified to the distributor of the life support requirements at the customer's premises and include the following information:

- NMI:
- Address:
- Customers name:
- Customers contact details:
- It is important that we have the customers correct / up to date contact number

Life Support notification after account established

A customer may advise that their premises has Life Support equipment after an account has been established. We **MUST** flag this against the customer's account and in our billing system.

The Life support form and important information outlined below will then be issued to the customer, which must be completed and returned by the customer in accordance with the above protocol.

We must ensure the customers details are correct and up to date (this will ensure the customer received any updates or notification in relation to any upcoming planned outages).

Retailer obligations when advised by distributor

When notified by a distributor, CleanPeak Energy will:

- (a) within one business day from being notified by the distributor, register that a customer residing or intending to reside at a property address requires life support equipment and register the date from which the life support equipment is required; and
- (b) no later than 5 business days after being notified by the distributor of the requirement for life support, provide the customer communication with the information listed below.

Retailer obligations when advised by exempt person

When notified by an exempt person, CleanPeak Energy will:

- (a) within one business day from being advised by the exempt person, register that a customer residing or intending to reside at the exempt persons premise requires life support equipment and register the date from which the life support equipment is required; and
- (b) within one business day from being notified by the exempt person, notify the relevant distributor that a person residing or intending to reside at the exempts persons premise requires life support equipment and the date from which the life support equipment is required

Life Support communications sent to customer

Once notified of the requirement for Life Support at a customer's premise, CleanPeak Energy will issue the following within 5 business days of being advised or becoming the financially responsible retailer:

- (a) A life support medical confirmation form.
- (b) Information advising the customer that if they fail to complete and return the life support medical confirmation form, their premise may be de-registered and will cease to receive life support protections.
- (c) Notice that there may be distributor planned interruptions under the Electricity Distribution Code and unplanned outages may occur. We will advise the customer that their distributor is required to notify the customer of any planned outages.
- (d) If CleanPeak Energy are the Gas retailer, we will advise that there may be distributor planned interruptions under the Gas Distribution System Code. We will also advise that there may be unplanned outages / interruptions to their gas supply and that their distributor is required to notify them.
- (e) Information to assist the customer on how to prepare for unplanned outage, including a plan of action.
- (f) CleanPeak Energy's (and their distributor's, if separate) emergency contact number.
- (g) Notice in respect of if the customer decides to change retailers, and the person residing at the premise still requires life support equipment, the customer should advise their new retailer of the requirement for life support equipment.
- (h) Notice of the types of equipment that fall within the definition of life support equipment.
- (i) Advice to the customer that they may be eligible for concessions and rebates offered by the State or federal governments, including information on how to access them.
- (j) Information on the availability of interpreter services and the contact number for these services in community languages.

Circumstances in which Retailer Obligations do not Apply

Once advised of the requirement for Life Support at a customer's premise, CleanPeak Energy must within 1 business day give details to either a gas or electricity distribution company who distributes gas or electricity to the relevant premises, unless:

- (a) The relevant customer of CleanPeak Energy has previously advised the distributor for the premises that a person residing or intending to reside at the customer's premises requires life support equipment;
- (b) The relevant customer advises CleanPeak Energy that they have already provided medical confirmation to the distributor for the premises; and
- (c) CleanPeak Energy confirms with the distributor for the premises that the relevant customer has already provided medical confirmation to the distributor.

Information to be given by a Retailer when Advised by Distributor

Once notified of the requirement for Life Support at a customer's premise, CleanPeak Energy will issue to the customer within 5 business days the information outlined in '*Life Support communications sent to customer*', unless:

- (a) CleanPeak Energy has previously provided that information to the relevant customer at the relevant customer's current premises.

Content of Life Support medical confirmation form

CleanPeak Energy will ensure the medical confirmation form issued to the customer has:

- (a) the date;
- (b) advice to the customer stating that completion and return of the form will satisfy the requirement to provide medical confirmation under the life support Energy Retail Code;
- (c) a request for the customer's property address;
- (d) a request for the date from which the customer requires supply of energy for the purpose of the life support equipment;
- (e) a request for medical confirmation;
- (f) specific details of the types of equipment that are classified as life support equipment;
- (g) advice to the customer stating that the date they must return the medical confirmation form; and
- (h) advice to the customer stating that they can request an extension to allow more time to complete and return the medical confirmation form.

Reminders for confirmation of premise as requiring life support equipment

Where CleanPeak Energy have been advised of the requirement for life support equipment at premises and have been provided with a medical confirmation form, we will:

- (a) provide the customer 50 business days to complete and return their medical confirmation form;
- (b) provide the customer at least two written reminder notices advising the customer must provide medical confirmation;
- (c) ensure the first reminder notice is provided no less than 15 business days from the date of issue of the medical confirmation form;

- (d) ensure the second reminder notice is sent to the customer no less than 15 business days from the date of issue of the first reminder notice
- (e) on request from a relevant customer, give the relevant customer at least one extension of time to provide medical confirmation. The extension must be a minimum of 25 business days.

CleanPeak Energy will ensure the reminder notices will:

- (a) include the date;
- (b) state the date for when the medical confirmation form is due;
- (c) state the types of equipment that fall under life support equipment; and
- (d) advise the customer the following:
 - (i) The customer must provide medical confirmation;
 - (ii) The premise is temporarily registered as requiring life support equipment until the medical confirmation is received;
 - (iii) Failure to provide the medical confirmation may result in the premise being de-registered for life support; and
 - (iv) An extension to provide more time to complete the medical confirmation form can be requested by the customer.

Ongoing retailer obligations

Where CleanPeak Energy are required to register a premises for the requirement of life support equipment after being advised by a customer, distributor or exempt person, we will:

- (a) provide the distributor relevant information around the requirement for life support at the premise including when the customer provides CleanPeak Energy medical confirmation and any relevant contact details for the customer within one business day from receipt;
- (b) update the registration within one business days of being notified by the customer, distributor or exempt person of any changes to the life support equipment requirements for the premise or any changes to the customer's contact details; and
- (c) not de-energise the premises from the date the life support equipment will be required at the premises (the date CleanPeak Energy were notified of the requirement for life support equipment at the premises)

De-registration of Life Support

CleanPeak Energy will not de-register a customer's premise except in the circumstances outlined below.

Where a customer has made no contact and where the customer has not provided a completed medical confirmation form, CleanPeak Energy may de-register the customer's premises for the requirement of life support equipment only when:

- (a) we have provided the customer minimum of 50 business days to provide a completed medical confirmation form;
- (b) we have provided the customer a reminder letter which has been issued to the customer no less than 15 business days after the medical confirmation form issue date;
- (c) we have provided the customer a second reminder letter to be issued to the customer no less than 15 business days after the 1st reminder was issued;

- (d) a de-registration letter which has been issued 15 business days after the second reminder letter, outlining the scheduled de-registration date if no contact made by a specific date (15 business days from the issue date of the letter);
- (e) we have attempted to contact the customer in person or via phone and or electronic means;
- (f) the customer has not provided medical confirmation before the date for de-registration specified in the de-registration notice.

If de-registration occurs we will advise the distributor within 5 business days of de-registration date including the reason for the de-registration. Within one business day from de-registration, we will update our billing and administrative systems to reflect life support no longer required.

The customer has advised they no longer require the Life support at their premises

If a customer advises they no longer require Life Support equipment at the premises, we must:

- (a) issue the customer a letter advising of the scheduled de-registration date on the basis that the customer has advised to CleanPeak Energy that the person for whom life support equipment is required has vacated the premises or no longer requires life support equipment;
- (b) the scheduled de-registration date must be 15 business days from the issue date of the letter and must advise the customer to contact CleanPeak Energy if they still require the Life Support prior to the date reflecting and once the de-registration occurs;
- (c) advise the distributor within 5 business days of de-registration date including the reason for the de-registration.

An exempt person has notified that they have de-registered a relevant customer

If CleanPeak Energy is notified by an exempt person that the exempt person has de-registered a relevant customer, we must:

- (a) within five business days of receipt of notification of de-registration, notify the distributor of the date of de-registration and reasons for de-registration; and
- (b) within one business day from de-registration, update its register of life support customers and residents in accordance with the recording keeping requirements.

De-registration where medical confirmation is not provided

- (a) A de-registration notice must:
 - (i) be dated;
 - (ii) specify the date on which the relevant customer will be de-registered, which must be a least 15 business days from the date of the de-registration notice;
 - (iii) advise the relevant customer they will cease to be registered as requiring life support equipment unless medical confirmation is provided before the date of de-registration; and
 - (iv) Advise the relevant customer that the relevant customer will not longer receive the protections under Division 5C of the *Electricity Industry Act* or Division 4AA of the *Gas Industry Act* when the relevant customer is de-registered.

CleanPeak Energy may deregister the relevant customer after being notified by the distributor that the distributor has de-registered the relevant customer's premises for failing to provide adequate medical confirmation and they took reasonable steps required to contact the customer and provide notice including a de-registration notice.

De-registration where there is a change in the relevant customer's circumstances

Where a relevant customer who has registered for life support equipment advises CleanPeak Energy that the person for whom life support equipment is required has vacated the premises or no longer requires the life support equipment, CleanPeak Energy may de-register the relevant customer:

- (a) at least 15 business days from the date of written notification if:
 - (i) CleanPeak Energy has provided written notification to the relevant customer advising:
 - (A) that the relevant customer will be de-registered on the basis that the relevant customer has advised CleanPeak Energy that the person for whom the life support equipment has vacated the premises or no longer requires the life support equipment.
 - (B) the date on which the relevant customer will be de-registered, which must be at least 15 business days from the date of that written notification;
 - (C) that the relevant customer will no longer receive the life support protections when the premises is de-registered;
 - (D) that the relevant customer must contact CleanPeak Energy prior to the date on which the customer will be registered if the person for whom the life support equipment is required has not vacated the premises or requires the life support equipment; and
 - (E) the relevant customer has not contacted CleanPeak Energy prior to the date on which the customer will be registered, to advise that the person for whom the life support equipment is required has not vacated the premises or requires the life support equipment; or
 - (b) on a date that is less than 15 business days from the date of written notification, if the relevant customer or their authorised representative gives explicit informed consent to the relevant customer being de-registered on that date.
 - (c) Explicit informed consent is consent given to a distributor where the distributor, or a person acting on behalf of the distributor has clearly disclosed in plain English all matters relevant to consent of the customer, including each specific purpose or use of the consent and the consent gives the consent and is competent to do so.
 - (d) Explicit informed consent requires the consent to be given by the customer:
 - (i) In writing signed by the customer; or
 - (ii) Verbally, so long as the verbal consent is evidenced in such a way that it can be verified and made the subject of a record; or
 - (iii) By electronic communication generated by the customer.
 - (e) A distributor must create a record of each explicit informed consent required and provided by a customer and retain the record for at least two years.
 - (f) A distributor may deregister a customer's supply address after being notified by CleanPeak Energy that CleanPeak Energy has de-registered the customer's supply address.
 - (g) A distributor may, at any time, request a customer whose supply address has been registered to confirm whether life support equipment is still required.

At this point, the customer will no longer be protected under the Life Support protections. The customer must contact CleanPeak Energy prior to the scheduled de-registration date if the person who requires the life support equipment still requires the life support equipment and is still at the premises.

It is important that we confirm whether a customer has Life Support at their premises when moving a customer out of their property / raising a de-energisation service order and follow the following steps

- (a) Check our billing system to ensure Life Support is not flagged.
- (b) If flagged: DO NOT raise a disconnection.
- (c) We must wait until the disconnection date passes and un-flag the account.
- (d) Raise the disconnection the following day for 3 business days.

Notes are to be left on the customer's account using the following template:

- Requested Move out date: xx/xx/xxxx
- Supply address:
- Forwarding address: (must be updated in the billing system and CRM for collection purposes, even if on email billing)

CleanPeak Energy may, at any time request a customer whose premise is registered for life support equipment to confirm if they still require the life support equipment and whether they are still residing at the registered premise.

2.4 Record Keeping

If CleanPeak Energy is notified by a distributor that the distributor has de-registered a relevant customer, CleanPeak Energy must within one business day from notification update its register of life support customers and residents in accordance with the following;

CleanPeak Energy has established policies, systems and procedures for registering and de-registering premises as requiring life support equipment to facilitate compliance.

We must ensure that all life support equipment registration and de-registration details are maintained and kept up to date, including the following:

- (a) the date when the customer requires supply of energy at the premise for the purpose of life support equipment;
- (b) when medical confirmation was received from the customer;
- (c) the date when the premise was de-registered and the reason;
- (d) a record of communications with the customer that contains each customer's explicit informed consent and is kept for 2 years; and
- (e) a record of explicit informed consent given by a customer or an authorised representative and retain the record for a minimum of 2 years.

2.5 Definitions

Life Support Equipment

Life support equipment is defined as any of the following:

- (a) an oxygen concentrator
- (b) an intermittent peritoneal dialysis machine
- (c) a kidney dialysis machine
- (d) a chronic positive airways pressure respirator
- (e) Crigler-Najjar syndrome phototherapy equipment
- (f) a ventilator for life support
- (g) in relation to a particular customer – any other equipment (whether fuelled by electricity or gas) that a registered medical practitioner certifies is required for a person residing at the customer's premises for life support.

'Other equipment' for the purposes of subclause (g) of the above definition of life support equipment may include, but is not limited to, the following:

- (i) external heart pumps
- (ii) respirators (iron lung)
- (iii) suction pumps (respiratory or gastric)
- (iv) feeding pumps (kangaroo pump, or total parenteral nutrition)
- (v) insulin pumps
- (vi) airbed vibrator
- (vii) hot water
- (viii) nebulizer, humidifiers or vaporizers
- (ix) apnoea monitors
- (x) medically required heating and air conditioning
- (xi) medically required refrigeration
- (xii) powered wheelchair.

3 Life Support Policy (other states)

If you are a customer and have not provided us with information relating to your need for life support protections, this notice tells you how you can let us know and what we will do with your account.

Notify us

You must notify us as soon as possible if you, or anyone living with you, needs life support.

You can notify us using the contact details on any contract, marketing information or bill you have received.

Once you have notified us we will note this on your account and ensure that your account is not disconnected.

Information we will require and what we will do

You will then be required to provide us with confirmation from a registered medical practitioner of your (or any other person residing with you) need for life support equipment.

We will then immediately notify the energy distributor of the need for life support equipment at your premises, giving them the information they need to update their records and registers.

We will also provide you with verbal and written confirmation and an emergency contact number for your distributor (the charge for which is no more than the cost of a local call).

Cessation of requirement for life support equipment

If you or any other person residing with you no longer have a requirement for life support equipment or you have vacated the premises and moved away, you must notify us as soon as possible. We will then notify the energy distributor who will update their records and registers.

4 Responsibilities under this Policy

Role	Responsibility
Board of Directors	Final approval of policy and monitoring compliance
Managers	<ul style="list-style-type: none"> • To ensure all day-to-day business services provided to CleanPeak’s customers comply with this Policy where appropriate and ongoing monitoring • Dealing with complaints under and breaches of this policy • Dealing with employees who have been subject to family violence
Retail team	Implement policy in interactions with customers

5 Complaints

We want to make our Life Support Policy work for our customers, and we will do what we can to resolve your concerns. If you are a customer and have a complaint about our Life Support Policy, we will do our best to work towards an early resolution. Contact our customer services team on 1 300 038 069 during business hours to discuss your complaint. Alternatively, you can send an email to info@CleanPeakenergy.com.au and we will contact you.

If you are not happy with the resolution of your complaint, you can contact the Energy Ombudsman in your state or Territory to request a review.

Australian Capital Territory Civil & Administrative Tribunal

Phone: (02) 6207 1740

Website: www.acat.act.gov.au

Energy & Water Ombudsman New South Wales

Phone: 1800 246 545

Website: www.ewon.com.au

Energy & Water Ombudsman Queensland

Phone: 1800 662 837

Website: www.ewoq.com.au

Energy & Water Ombudsman South Australia

Phone: 1800 665 565

Website: www.ewosa.com.au

Energy & Water Ombudsman of Victoria

Phone: 1800 500 509

Website: www.ewov.com.au

Energy & Water Ombudsman Western Australia

Phone: 1800 754 054

Website: www.energyandwater.ombudsman.wa.gov.au

6 Privacy

CleanPeak Energy is committed to respecting our customers' privacy. We protect the personal information of our customers and employees in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

More information on how we collect, use, store and disclose personal information can be found in our Privacy Policy.