

15 April 2026

Dear Retailer / Distributor

Registration of life support customers at premises with PeakSmart air conditioning units

The Australian Energy Regulator (AER) is writing to remind retailers and distributors of their obligations in relation to the registration of customers requiring life support equipment at premises where a PeakSmart air conditioning unit is installed.

Compliance with the life support obligations under the National Energy Retail Rules (Retail Rules) and the National Energy Retail Law is critical to protecting customers experiencing vulnerability. Ensuring compliance with these critical rules and laws is an enduring priority for the AER¹ and the AER will consider taking enforcement action where there is serious non-compliance.

Background

In March 2026, the AER received information concerning the refusal of a Queensland retailer to register a customer as requiring life support on the basis that the customer was moving into a premises fitted with a PeakSmart air conditioning unit. The AER considers this refusal to be inconsistent with obligations under the Retail Rules.

AER expectations

The AER expects retailers and distributors to ensure they are compliant with life support obligations under the Retail Rules.

We understand that the terms and conditions of the PeakSmart demand management program state that participation is not recommended where a person living at, or intending to live at, a premises requires thermally sensitive life support equipment.² The AER's position is that:

- retailers and distributors must register a customer's premises as requiring life support equipment where the relevant criteria are met; and

¹ [Compliance and Enforcement Priorities for 2025-26](#).

² Energex, PeakSmart program terms and conditions, viewed on 9 April 2026, <https://www.energex.com.au/manage-your-energy/peaksmart-air-conditioning/t-and-cs/peaksmart-program-terms-and-conditions>

- the presence of a PeakSmart air conditioning unit does not remove or change life support registration obligations.

Ensuring accurate and timely life support registration is critical to the safety and wellbeing of customers who depend on life support equipment.

Reporting non-compliance

Where a potential breach of a life support obligation is identified, retailers and distributors must report the potential breach to the AER in accordance with section 274 of the National Energy Retail Law and the AER's [Compliance Procedures and Guidelines](#). Many life support obligations are required to be reported immediately.

In assessing these reports and the information it receives, the AER will consider appropriate regulatory action in line with the AER's [Compliance and Enforcement Policy](#).

Further information regarding the AER's expectations and practical guidance on how to comply with the relevant obligations is available in the AER's [Life Support Registration Guide](#).

If you wish to discuss any of the matters raised in this letter or have any queries, please contact the team at aercompliance@aer.gov.au.

Yours sincerely

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Compliance and Enforcement