



## VPP Life Support Safety Policy

### 1. Purpose

Our priority is customer safety. This policy explains why customers who rely on medically-required life support equipment are not eligible to join our Virtual Power Plant (VPP) offers.

### 2. Who this applies to

This policy applies to:

- life support customers; and
- all ENGIE Energy Plans that require the use or access to customers' energy storage systems, such as ENGIE VPP or Battery plans (Relevant Plans).

"Life support customers" means any customer who has told us or their electricity distributor that someone at the premises needs electricity for medically-required equipment (for example, ventilators, oxygen concentrators, dialysis machines, and sleep machines such as CPAP (Continuous Positive Airway Pressure)).

### 3. The policy

- If your premises is registered (or should be registered) as requiring life support, you cannot participate in our VPP.
- This exclusion is based on objective, safety-led reasons outlined below and will be reviewed from time to time.

### 4. Why this matters

VPPs are not suitable for life support customers based on the current technology and VPP processes we have access to. We cannot guarantee an uninterrupted supply or a minimum battery reserve across all device types and control platforms that participate in ENGIE's Relevant Plans which we believe creates a safety risk to Life support customers.

Key reasons include:

- Different Battery Manufacturer's capabilities and control behaviours
  - i. Device features vary by manufacturer and mobile application. Responses to ENGIE dispatch instructions can differ across Battery Manufacturer platforms.
  - ii. Some Battery Manufacturer systems can support larger solar systems and sustain solar energy supply during an outage, but behaviour is not uniform.
- Battery state-of-charge (SoC) after VPP events
  - i. Although some Battery Manufacturers are able to set a 20% minimum SoC for customer use via their proprietary cloud platform(s), others that are facilitated by our third party platform have varied response times and we cannot promise that a 20% SoC will remain after an ENGIE dispatch.
- Compound outage risk
  - i. A VPP event in which electricity is exported may be followed by an unplanned grid outage. Because we cannot guarantee the remaining battery capacity across all devices, there is a risk a life-support customer could be left without sufficient backup to follow their medical emergency plan.
- Control and communications risks
  - i. VPP orchestration depends on real-time signals and multiple systems. Misconfiguration, latency, device faults or cyber events could reduce available power or delay restoration.
- Extreme conditions
  - i. During severe weather or grid emergencies, distributed assets or communications may not perform as expected, increasing the risk of interruption.

### 5. What this means for you

- If you need life support equipment you must not enrol in any Relevant Plans. We can help you choose a suitable alternative energy plan.
- If your circumstances change: tell us if anyone at your premises starts or stops needing life support so we can update your account and plan eligibility.

### 6. How to register or confirm life support status

- Contact your electricity distributor and retailer (us) to register as a life support customer. If you're unsure who your distributor is, ask us and we'll confirm.
- Keep your medical confirmation up to date as required under energy regulations.

### 7. Support and alternatives

- Alternative plans: We can offer you another ENGIE plan that does not include VPP participation.
- Backup planning: Speak to your medical provider about appropriate backup power arrangements for your equipment. ENGIE cannot advise on medical needs, but we recommend you have a written emergency power plan.
- Equipment advice: For questions about your specific battery or inverter backup capabilities, please contact your device manufacturer or installer.

### 8. Complaints and assistance

- If you have feedback or wish to dispute a decision, please contact us first. We'll aim to resolve your complaint promptly and fairly.
- If you're not satisfied, you may escalate to your state or territory Energy & Water Ombudsman.

### 10. Related information

- ENGIE Energy Plan Terms & Conditions
- VPP Special Conditions
- Life Support Customer Protections (jurisdictional energy rules)
- New Energy Tech Consumer Code: fitness-for-purpose and vulnerable customer care commitments

Effective date: 22 April 2026.

#### References

1. New Energy Tech Consumer Code; and related attachments, proposed amendments and applications: New Energy Tech Consumer Code | ACCC