

Essential Services Commission  
Level 8/570 Bourke St  
Melbourne VIC 3000  
Submitted via email: [energyreform@esc.vic.gov.au](mailto:energyreform@esc.vic.gov.au)

8 May 2025

Dear Commissioners,

**Proposed revocation of the Electricity Customer Transfer Code of Practice and Electricity Customer Metering Code of Practice.**

The Australian Energy Council ('AEC') welcomes the opportunity to make a submission in response to the Essential Services Commissions ('ESC') *Proposed revocation of the Electricity Customer Transfer Code of Practice and Electricity Customer Metering Code of Practice* Consultation Paper ('Consultation Paper')

The AEC is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. AEC members generate and sell energy to over 10 million homes and businesses and are major investors in renewable energy generation. The AEC supports reaching net-zero by 2050 as well as a 55 per cent emissions reduction target by 2035 and is committed to delivering the energy transition for the benefit of consumers.

The AEC supports the Commission's intent to streamline and modernise the regulatory framework by revoking these outdated instruments. We acknowledge that the obligations previously contained in the Transfer Code and Metering Code are now comprehensively addressed by a suite of national and Victorian regulatory instruments.

We agree that maintaining multiple overlapping codes can lead to duplication, confusion, and unnecessary regulatory burden. Aligning Victorian obligations with the broader national framework improves consistency, enhances efficiency for market participants, and supports better outcomes for customers.

We appreciate the Commission's consultative approach and its intention to identify any provisions that may require retention under civil penalty arrangements. We are not aware of any specific provisions from the Transfer or Metering Codes that are not otherwise captured in the instruments listed above. However, we encourage the Commission to continue working closely with stakeholders to ensure a smooth and transparent transition.

Any questions about this submission should be addressed to Braeden Keen by email to [braeden.keen@energycouncil.com.au](mailto:braeden.keen@energycouncil.com.au)

Yours sincerely,

**Braeden Keen**  
Policy Advisor