

14 May 2025

Essential Services Commission
Level 8/570 Bourke St
Melbourne VIC 3000

By online submission: energyreform@esc.vic.gov.au

Dear Commissioners

AEMO Response to Proposed revocation of the Electricity Customer Transfer Code of Practice and Electricity Customer Metering Code of Practice

AEMO welcomes the opportunity to provide feedback on the Essential Services Commission's (the Commission) review of the *Electricity Customer Transfer Code of Practice* (Transfer Code) and the *Electricity Customer Metering Code of Practice* (Metering Code).

AEMO supports the Commission's objective to modernise and simplify the regulatory framework by revoking these Codes. We agree that the obligations currently contained in the Transfer Code and Metering Code are appropriately covered through a combination of the National Electricity Rules, AEMO procedures, and other instruments referenced in the consultation materials.

Harmonising regulatory requirements in Victoria with national frameworks is expected to reduce complexity and improve efficiency for market participants, ultimately delivering better outcomes for energy consumers.

AEMO is not aware of any provisions within the Transfer Code or Metering Code that are not already addressed under the applicable rules and procedures. We remain available to assist the Commission should any questions arise regarding matters within AEMO's procedural remit that intersect with the Codes. Should the Commission identify any provisions requiring retention that are not otherwise accommodated, AEMO is willing to work collaboratively to explore whether they could be incorporated into existing AEMO procedures or addressed through alternative means.

AEMO also requests that the Commission keep us informed as the consultation progresses. Should clause 5.1(b) of the Transfer Code be deemed redundant, AEMO will need to implement corresponding changes within our procedures and systems to ensure alignment with the updated regulatory framework as it comes into effect.

AEMO looks forward to continuing its collaboration with the Commission and other stakeholders on this important consultation. Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath, Group Manager – Strategic Market Reform, at [REDACTED]

Yours sincerely,

[REDACTED]
Violette Mouchaileh
Executive General Manager – Policy & Corporate Affairs