

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

By Email: energyreform@esc.vic.gov.au

8 May 2025

Dear Essential Services Commission,

Revocation of the Electricity Customer Transfer Code of Practice (Transfer Code) and Electricity Customer Metering Code of Practice (Metering Code)

At AGL, we believe energy makes life better and are passionate about powering the way Australians live, move, and work. Proudly Australian for more than 185 years, AGL supplies around 4.5¹ million energy, telecommunications, and Netflix customer services. AGL is committed to providing our customers simple, fair, and accessible essential services as they decarbonise and electrify the way they live, work, and move.

We operate Australia's largest private electricity generation portfolio within the National Electricity Market, comprising coal and gas-fired generation, renewable energy sources such as wind, hydro and solar, batteries and other firming technology, and storage assets. We are building on our history as one of Australia's leading private investors in renewable energy to now lead the business of transition to a lower emissions, affordable and smart energy future in line with the goals of our Climate Transition Action Plan. We'll continue to innovate in energy and other essential services to enhance the way Australians live, and to help preserve the world around us for future generations.

AGL supports the proposed revocation of the Transfer Code and Metering Code, as this will promote greater harmonisation between Victorian energy regulations and the National Electricity Market (NEM) and National Energy Customer Framework (NECF). More specifically, AGL agrees with:

- **the removal of the Victorian-specific NMI Standing Data Schedule**, noting that AEMO already maintains the relevant national procedures, which are currently being updated to reflect reforms relating to Consumer Energy Resources (CER) and Flexible Trading Arrangements (FTAs). We note however, that the implications of these reforms may be more complex in the Victorian context, where distribution businesses – not retailers – are responsible for smart meter deployment.
- **the removal of the certified debt transfer objection provision**, as this aligns Victorian processes with broader NEM practices. However, we note that the revocation of the certified debt transfer objection provision will require sufficient notice to allow AEMO and market participants adequate time to update their systems and disable the relevant functionality. We recommend 30 days.
- **the removal of outdated obligations for embedded network operators** within the Metering Code, which are now more appropriately covered by the General Exemption Order 2022, the National Electricity Rules, and other existing regulatory instruments.
- **the removal of physical access requirements for metering data**, as customer access to data is now adequately addressed through digital mechanisms, with further improvements expected under upcoming national reforms.

Overall, AGL agrees that removing these outdated or duplicative provisions will reduce regulatory complexity without compromising consumer protections or reducing market efficiency.

¹ Australian Energy Regulator (2025), [Retail energy market performance update for Quarter 2, 2024–25](#).



If you have any questions in relation to this submission, please contact Mark Riley, Senior Industry Advisor at



Yours sincerely,



Liam Jones
Senior Manager Policy and Market Regulation