

Annex B: Proposed changes to Electricity Distribution Code of Practice

This table summarises changes between the Electricity Distribution Code of Practice (v 14), deemed to be a code of practice by operation of the Essential Services Commission (Compliance & Enforcement Powers) Amendment Act 2021 and amended on 20 December 2021 (current EDCOP)¹ and the proposed Electricity Distribution Code of Practice. Note that minor typographical changes may not be reflected in this table.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
NA	Part 1 - 4	The EDCOP has been restructured into four parts to increase accessibility. Part 1 deals with preliminary matters of purpose, application and interpretation. Part 2 contains provisions relating to relations with customers and retailers. Part 3 addresses technical obligations. Part 4 deals with administrative matters, including but not limited to reviews and provision of information requirements.
1	1	This section is entitled 'This Code of Practice'. No change.
1.1	1.1	This clause sets out the EDCOP's purpose and has been expanded to better reflect the EDCOP's contents. Change: The existing objects at sub-clauses (a) to (d) of the EDC are collapsed into (a)(i) – (ii) and new objects (b) to (e) are added. Object (b) refers to regulating disconnection and planned and unplanned interruptions of supply. Object (c) refers to

¹ See ['Annex E: Amendments to the Electricity Distribution Code of Practice'](#) in: Essential Services Commission, 'Making an Energy Retail Code of Practice: Final Decision', 20 December 2021.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		protecting against disconnection and interruption of supply to life support customers consistently with Part 2, Division 5C of the Energy Legislation Amendment (Energy Fairness) Act 2021. Object (d) refers to regulating exempt distributors' activities. Object (e) refers to promoting long term interests of Victorian consumers.
1.2	1.2	This clause identifies when the EDCOP v2 will take effect. No material change.
1.3	1.3	This clause identifies matters relating to the EDCOP's application and clarifies when the Code of Practice applies to exempt distributors. Change: The clause indicates that the EDCOP is made under section 47(1) of the Essential Services Commission Act 2001. As subordinate legislation, the EDCOP no longer applies as a licence condition. It applies to exempt distributors where either a clause states that is the case or where an exempt distributor is a customer of a distributor (to the extent the EDCOP confers any right or imposes any obligation upon a customer).
NA	1.4	This clause provides a mechanism for exemption from compliance with provisions of the EDCOP if the commission, in its full discretion, considers it is appropriate.
	1.5	This clause provides a mechanism for distributors and large customers to agree to vary their rights and obligations under the code of practice, provided that agreement is notified to the commission within 14 days. It is based on clause 1.6 of the Electricity Distribution Code (version 13), but narrowed in scope to only apply to large customers (as defined) on the basis that small customers require the protection of the code.
1.4.1	15.4.1	This clause provides that a customer is deemed to comply with an obligation under the EDCOP unless the customer is expressly informed of the non-compliance or otherwise becomes aware or could reasonably have been expected to be aware of the non-compliance. This clause has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
1.4.2	15.2.2	This clause provides for deemed compliance by a distributor with the EDCOP where a breach is caused by a customer unless the distributor has not taken steps to notify a customer of the non-compliance. This clause has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
1.5	15.5	This clause requires a person who is not the owner of a supply address to use best endeavours to have the owner or other responsible person comply with the EDCOP and has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
1.7	Schedule 1	This clause identifies which EDCOP provisions are specified as civil penalty requirements for purposes of the Essential Services Commission Act 2001 and has been moved to Schedule 1 of the EDCOP. Change: Specific clauses referenced have been renumbered to reflect amendments and restructuring in EDCOP version 2.
1.8	Deleted	This clause has been deleted .
2	3	This section addresses connection of supply and energisation and has been moved to Part 2, Section 3: Connection of Supply. Change: The section has been amended to clarify that distributors must comply with obligations under Chapter 5, Part B (Network Connection and Access) and Chapter 5A (Electricity connection for retail customers) of the NER, in addition to obligations set out in the EDCOP.
N/A	3.1	This is a new clause clarifying the interaction between connection provisions as set out in EDCOP and the NER.
2.1.1	Deleted	This clause provided for a distributor to provide, install and maintain standard metering and associated equipment and has been deleted because it overlaps with, and is superseded by, provisions of NER Ch 7 (Vic) that relate to a metering coordinator and a metering provider's obligations to provide, install and maintain metering equipment: in particular, NER Ch 7 (Vic) clauses 7.3.2(e)(1), 7.8.1(a) & (c).
2.2	3.2	This clause deals with new connections and provides that a distributor must comply with its obligations under the NER (which will include responding to connection requests in accordance with the relevant timing request for connection depending on its type (eg basic, standard or negotiated). Change: The clause has been redrafted to clarify that the timing requirements are those as set out in the NER. The commission noted that, presently, some standing offers (as approved by the AER) refer to connections being done in accordance with the timeframe as required by the EDC. A transitional provision has been inserted in Schedule 5 to clarify that such clauses shall be taken to require connection within ten business days.
2.3	3.3	This clause sets out the circumstances in which a distributor must not energise a customer's supply address and has been moved to Part 2, Section 3: Connection of Supply. No material change.
2.3.1	3.3.1	This clause provides that a distributor must not energise a customer's supply address unless certain conditions are met and has been moved to Part 2, Section 3: Connection of Supply.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		Change: To avoid inconsistency with NER clause 5A.D.3(b), this clause has been amended to acknowledge that a request to energise an existing connection to a supply address may be made by a customer or by a retailer on the customer's behalf.
2.3.2	3.3.2	This clause deals with situations in which a customer requests energisation but has not demonstrated they have engaged a retailer and allows the distributor to connect without energisation. The clause has been moved to and has been moved to Part 2, Section 3: Connection of Supply. Change: For consistency with NER clause 5A.D.3(b), this clause has been amended to allow a customer to contact a distributor directly to request energisation, provided the distributor is satisfied that the customer has engaged a retailer (who becomes the financially responsible market participant for that supply address).
NA	3.3.3.	This is a new clause that makes it clear clauses 3.3.1 applies to exempt distributors .
2.4	Deleted	This clause dealt with connections in situations where a customer's supply address cannot be energised and provided for connections to be made, without energisation, either on an agreed date or, where there is no agreement, within 20 business days of the request's receipt. Change: This clause has been deleted . For consistency with the new drafting of clause 3.2 of the EDCOP and NER clause 5A.F.7, this clause has been removed. Timing requirements for connections without energisation are those set out in the NER. A transitional provision inserted in Schedule 5 addresses standing offers (as approved by the AER) which refer to connections being done in accordance with the timeframe as required by the EDC.
2.5	3.4	Clause 3.5 deals with energising previously connected customers and has been moved to Part 2, Section 3: Connection of Supply.
NA	3.4.1	This clause deals with energising previously connected customers and has been moved to Part 2, Section 3: Connection of Supply. Change: To avoid inconsistency with NER clause 5A.D.3(b), this clause has been amended to allow a customer to contact a distributor directly to request energisation and has been separated into sub-clauses (a) and (b) to address the deadline for energisation where a request is made after 3 pm.
NA	3.4.2	This is a new clause to specify that clause 3.4 applies to exempt distributors .

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
2.6	3.5	This clause deals with conditions for connection and has been moved to Part 2, Section 3: Connection of Supply.
2.6.1	3.5.1	<p>This clause identifies the conditions to which a distributor's obligation to make connection are subject and has been moved to Part 2, Section 3: Connection of Supply.</p> <p>Change: This clause has been amended to delete conditions (b) and (d) (technical requirements) and replace them with a single condition that the customer must have complied with conditions for connection set out in its connection contract. The aim of this deletion is to remove duplication given that the NER already requires connection contracts and standing offers to cover safety and technical requirements to be complied with by customers.</p>
2.6.2	3.5.2	<p>This clause provides for distributors making connection after removal of the reason for which connection was not made and has been moved to Part 2, Section 3: Connection of Supply.</p> <p>Change: The clause has been amended to specify the maximum connection times within which connection must be made.</p>
NA	3.5.3	This is a new clause to specify that the clause 3.5 applies to exempt distributors .
3	7	This section deals with customer obligations under the EDCOP; it has been moved to Part 2, Section 7: Customer Obligations. No material change.
N/A	7.1	This is a new clause that provides a simplified outline of a customer's obligations under the EDCOP.
3.1	19.2	<p>This clause requires distributors to use best endeavours to maintain their distribution system assets; it has been moved to Part 3, Section 19: Good Asset management.</p> <p>Change: The explanatory note box has been moved to a Note at the foot of the clause.</p>
3.1A	Deleted	This clause dealt with security of supply obligations applicable in Melbourne's CBD and has been deleted since it related to only a single distributor (CitiPower) and is no longer relevant.
3.2	7.2	This clause requires customers to use best endeavours to maintain their electrical equipment to work with the distribution system; it has been moved to Part 2: Section 7: Customer Obligations.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		Change: Former sub-clauses 3.2.2(e) and (f) have been deleted because whether a customer's use of electricity conforms with the appropriate tariff category is principally a matter that should be resolved between customer and retailer.
3.3	7.3	This clause requires customers to use best endeavours to maintain their electrical equipment to work with the distribution system; it has been moved to Part 2: Section 7: Customer Obligations. No change.
N/A	19	This is a new section in Part 3, entitled 'Asset Management and Planning'.
N/A	19.1	This is a new clause that provides a simplified outline of the requirements in section 18, which set out a distributor's obligations to develop and implement plans to ensure security and reliability of supply.
3.4	19.3	This clause provides for distributors to submit an annual Transmission Connection Planning Report to the commission and specifies the information to be included in such reports. The clause has been moved to Part 3: Section 19: Asset Management and Planning. Change: This clause has been amended to remove provisions permitting a distributor to impose a charge for providing a customer with a copy of the transmission planning report, noting that distribution licences do not expressly provide for distributors to be able to impose charges for particular services.
3.5	19.4	This clause provides for distributors to submit an annual Distribution System Planning Report to the commission and specifies the information to be included in such reports. The clause has been moved to Part 3: Section 19: Asset Management and Planning. Change: This clause has been amended to remove provisions permitting a distributor to impose a charge for providing a customer with a copy of the distribution system planning report, noting that distribution licences do not expressly provide for distributors to be able to impose charges for particular services. Clauses 3.5.1(c) and 3.5.3A have been deleted since they related to only a single distributor (CitiPower) and are no longer relevant.
4	20	This clause has been moved to Part 3, Section 20: Quality of Supply
N/A	20.1	This is a new clause that provides a simplified outline of distributors' obligations regarding the quality of supply that they must maintain and the circumstances in which they must pay compensation for damage to property due to excessive voltage variations.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
4.1	20.2	This clause acknowledges AEMO's responsibility for the frequency on each distributor's distribution system under the NER; it has been moved to Part 3, Section 20: Quality of Supply. No material change.
4.2	20.3	This clause specifies the nominal voltages that must be maintained at the point of supply to a customer's electrical installation and has been moved to Part 3, Section 20: Quality of Supply. Change: The words "meter electrically closest to and applicable to" have been inserted in clause 20.3.1 to clarify where voltage compliance should be measured. The table at clause 20.3.2 has been revised to clarify how the AS 61000.3.100 and +13/-10% limits apply concurrently for nominal voltage levels less than 1kV. Notes have been amended for similar clarification. Clause 20.3.3 now refers to the row of Table 1 that is applicable. Clause 2.3.8 has been amended to make that clause subject to EDCOP 9.3.3 (which reduces a distributor's liability if a business customer has failed to take reasonable precautions to reduce its risk from poor service quality or reliability of supply) and to replace the reference to 'any relevant guidelines' and 'Guideline 11' with a reference to 'Schedule 4'. Clause 20.3.9 is a new clause that provides that exempt distributors are subject to the requirements of clauses 20.3.1 to 20.3.6.
4.3	20.4	This clause specifies power factor limits that must be maintained in relation to a customer's demand for power and has been moved to Part 3, Section 20: Quality of Supply. Change: New clause 20.4.6 has been added to clarify that values in Table 2 apply to the customer's load, net of any generation within the customer's electrical installation. New clause 20.4.7 has been added to specify that clauses 20.4 applies to exempt distributors ; minor changes to column headings in Table 2.
4.4	20.5	This clause specifies that distributors must maintain harmonic levels in voltage at the point of common coupling nearest to a customer's point of supply in compliance with system standards set out in the NER and has been moved to Part 3, Section 20: Quality of Supply. Change: New clause 20.5.4 has been added to address the potential need to tighten harmonic levels to maintain proper operation of a Rapid Earth Fault Current Limited (REFCL). New clause 20.5.4 has been added to specify that clauses 20.5 applies to exempt distributors ; other minor changes to clauses 20.5.1 – 20.5.3, including renumbering Table 4 as Table 3.
4.5	20.6	This clause requires distributors ensure that inductive interference caused by their distribution systems are within specified limits and has been moved to Part 3, Section 20: Quality of Supply.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		Change: New clause 20.6.2 has been added to specify that clause 20.6 applies to exempt distributors .
4.6	20.7	This clause requires distributors to maintain negative sequence voltage within the NER's system standards and has been moved to Part 3, Section 20: Quality of Supply. Change: New clause 20.7.2 has been added to specify that clause 20.7 applies to exempt distributors .
4.7	20.8	This clause deals with load balance and limits the amount by which current in a customer's three-phase electrical installation may deviate from the average of three phase currents; the clause has been moved to Part 3, Section 19: Quality of Supply. Change: New clause 20.8.3 has been added to specify that clauses 20.8 applies to exempt distributors .
4.8	20.9	This clause deals with disturbing loads and requires distributors to maintain voltage fluctuations at each point of common coupling within limits specified in the NER; the clause has been moved to Part 3, Section 20: Quality of Supply. Change: New clause 20.9.3 has been added to specify that clauses 20.9 applies to exempt distributors .
4.9	20.10	This clause requires distributors to monitor the quality of supply in accordance with principles of good asset management and has been moved to Part 3, Section 20: Quality of Supply. No material change.
5	13	This section sets out reliability targets for distributors and has been moved to Part 2, Section 13: Reliability Targets. No change.
NA	13.1	This is a new clause that provides a simplified outline clarifying that Section 13 specifies information that distributors must publish about targets for reliability of supply.
5.1	13.2	Clause 13.2 requires distributors to publish, annually, their reliability targets for the next year and specifies the information that must be included; the clause has been moved to Part 2, Section 13: Reliability Targets. Change. The clause has been amended to conform with the AER's role in setting certain reliability performance targets under the STPIS scheme. The requirement to publish the reliability targets in a newspaper has been removed.
5.2	13.3.1	This clause requires distributors to use best endeavours to meet reliability targets and has been moved to Part 2, Section 13: Reliability Targets.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		Change. The clause has been amended for consistency with the AER’s role in setting certain reliability performance targets under the STPIS scheme.
NA	11	This is a new section in Part 2, entitled ‘Interruption of Supply’.
NA	11.1	This is a new clause setting out a simplified outline of customers’ rights and distributors’ obligations in relation to distributors’ planned and unplanned interruptions of supply.
5.3	11.2	This clause specifies circumstances in which a distributor may interrupt supply and has been moved to Part 2, Section 11: Interruption of Supply. Change: This clause has been moved to Part 2, Section 11 in order to separate interruption of supply provisions from distributor reliability targets and amended to make clear that a distributor’s right to interrupt supply is subject to clause 11.5 in the case of planned interruptions. Sub-clause 11.2.1(d) has been amended to replace “AEMO or the system operator” with “relevant authority”, incorporating the definition based on clause 88 of the National Energy Retail Rules (NERR) in clause 2.1 (glossary). New clause 11.2.2 has been added to specify that clause 11.2.1 applies to exempt distributors.
5.4	11.3	This clause specifies a distributor’s obligations in event of unplanned interruptions and has been moved to Part 2, Section 11: Interruption of Supply. Change: Clause 11.3.1 amended to clarify requirement for timing of information becoming available on unplanned interruptions and that if no reliable information is available to inform an estimate of when supply will be restored, an estimate of when information on restoration of supply will be available: New sub-clause 11.3.3 is added to provide that clauses 11.3.1(c) and 11.3.2 apply to exempt distributors .
5.5a	11.4	This clause establishes requirements for distributor communications with customers regarding unplanned supply interruptions and has been moved to Part 2, Section 11: Interruption of Supply. No material change.
5.5	11.5	This clause sets out the requirements for notice that must be provided by distributors in the event of a planned interruption, including the manner and contents of notice and has been moved to Part 2, Section 11: Interruption of Supply. Change: New sub-clause 11.5.9 has been added to provide that clause 11.5 applies to exempt distributors .

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
5.5.3	11.6	This clause requires distributors to use best endeavours to restore supply after a planned interruption and has been moved to Part 2, Section 11: Interruption of Supply. No change.
5.6	11.7	This clause details distributors' obligations when they cancel or reschedule planned interruptions, including the contents of customer notices, and has been moved to Part 2, Section 11: Interruption of Supply. No change.
5.7	11.8	This clause specifies the notifications distributors must provide to government in the event of widespread supply interruptions and has been moved to Part 2, Section 11: Interruption of Supply. Change: The clause now specifies the government department to be notified (i.e., Department of Health); sub-clause 11.8.2 has been added to make it clear the requirements in 11.8 applies to exempt distributors .
5A	12	This section sets forth distributors' obligations with respect to persons requiring life support equipment and has been moved to Part 2, Section 12: Life Support Equipment. Change: Clauses related to life support were amended to conform to the Energy Legislation Amendment (Energy Fairness) Act 2021 as part of the commission's <i>Final Decision: Making an Energy Retail Code of Practice</i> (see Annex E). Proposed new changes to life support in this version are minor and associated with the restructuring of the code only.
NA	12.1	This is a new clause and provides a simplified outline of the EDCOP provisions related to life support equipment.
5A.1	Deleted	This clause outlined requirements related to life support equipment and has been deleted as unnecessary given new clause 12.1.
5A.2	Deleted	This clause identified the objectives related to life support equipment and has been deleted as unnecessary given new clause 12.1.
5A.3	12.2	This clause specifies the actions distributors must take to record life support customer details in a register of life support customers and residents when advised that a life support resident resides or intends to reside at a small customer's premises; the clause has been moved to Part 2, Section 12: Life Support Equipment. No material change.
5A.4	12.3	This clause specifies the requirements distributors must comply with when they seek medical confirmation of the need for life support equipment at the small customer's premises and has been moved to Part 2, Section 12: Life Support Equipment. No change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
5A.5	12.4	This clause identifies a distributor's ongoing obligations with respect to maintaining and updating the register of life support customers and residents and has been moved to Part 2, Section 12: Life Support Equipment. No change.
5A.6	12.5	This clause specifies the circumstances in which a distributor may deregister premises that have been placed the register of life support customers and residents and has been moved to Part 2, Section 12: Life Support Equipment. No change.
5A.7	12.6	This clause imposes obligations on distributors to maintain registration and deregistration details and on the register of life support customers and residents and has been moved to Part 2, Section 12: Life Support Equipment. No change.
5A.8	12.7	This clause set out detailed obligations for exempt distributors with respect to life support equipment broadly similar to those imposed on distributors and has been moved to Part 2, Section 12: Life Support Equipment. Change: Sub-clause 5A.8.1, which set out the requirements and objective of life support clauses related to exempt distributors, has been deleted as unnecessary given new clause 12.1.
6	14	This clause establishes guaranteed service levels for distributors and has been moved to Part 2, Section 14: Guaranteed Service Levels. No material change.
N/A	14.1	This is a new clause and sets out a simplified outline of the minimum service levels distributors must meet and the payments that must be made if those service levels are not met.
6.1a	14.2.	This clause specifies to whom compensation is owed if a distributor is required to make a GSL payment and has been moved to Part 2, Section 14: Guaranteed Service Levels. Change: Clause 6.1(a) has been deleted and replaced with new clause 14.2.1, that clarifies section 14 only applies in relation to customers whose annual electricity consumption is, or is likely to be, 160 MWh or less. The clause has minor drafting modifications to clarify that the obligation to pay a GSL payment obligation is linked to the supply address, not the customer. New sub-clause 14.2.2 has been added to provide that distributors may undertake to provide higher GSL than set out in clause 14.
6.1	14.3	This clause deals with service appointments and the GSL payment distributors must make when they miss service appointments and has been moved to Part 2, Section 14: Guaranteed Service Levels. No material change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
6.2	14.4	This clause specifies the GSL payment distributors must make when they fail to connect a new customer by the required date and has been moved to Part 2, Section 14: Guaranteed Service Levels. No material change.
6.3	14.5	This clause deals with supply restoration and low reliability payments associated with service interruptions and has been moved to Part 2, Section 14: Guaranteed Service Levels. Change: Requirement to apply to the commission to be excused from making a GSL payment if an event relates to certain events (unchanged) has been removed and replaced with a requirement for a distributor to notify the commission if it excludes an event as giving rise to GSL payments.
6.3A	14.6	This clause specifies payments distributors must make for unplanned interruptions on major event days and has been moved to Part 2, Section 14: Guaranteed Service Levels. No material change.
6.3B	14.7	This clause deals with data distributors are to use in determining customers' eligibility for GSL payments and has been moved to Part 2, Section 14: Guaranteed Service Levels. No material change.
6.4	14.8	This clause specifies the time for distributors to make GSL payments and has been moved to Part 2, Section 14: Guaranteed Service Levels. Change: No equivalent to current clause 6.4.4 has been included as the need to make an application for exclusion has been removed.
7	21	This clause deals with obligations applicable to embedded generators and has been moved to Part 3, Section 21: Embedded Generators.
NA	21.1	This is a new clause and provides a simplified outline of the requirements of Part 3, Section 21: Embedded Generators.
NA	21.2	This is a new clause that deals with application of Part 3, Section 20: Embedded Generators.
NA	21.2.1	This is a new clause and specifies that Part 3, Section 20: Embedded Generators applies only to embedded generating units with a generating capacity between 5 and 30 MW, being generation to which the technical standards in the NER will not automatically apply.
7.1	Deleted	This heading of this clause, 'Agreement to connect' has been deleted as unnecessary (changes to sub-clauses are described below).

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
7.1.1	Deleted	This clause required a distributor to comply with its connection agreement with an embedded generator and has been deleted as unnecessary due to connections being governed by the NER Ch 5 of Ch 5A.
7.1.2	Deleted	This clause required a distributor to negotiate connection with an embedded generator in good faith and has been deleted as unnecessary since this obligation is governed by NER Ch 5 or Ch 5A.
7.1.3	21.2.2	This clause deals with embedded generating units connected in parallel and has been moved to Part 3, Section 21: Embedded Generators. No material change.
NA	4	This is a new section entitled 'Connection of Embedded Generators'.
NA	4.1	This is a new clause that provides a simplified outline of distributors' obligations relating to connection of embedded generators under NER Ch 5, Part B and NER Ch 5A. This is retained for signposting purpose only.
	4.2	This clause makes clear that connection of embedded generators is undertaken in accordance with obligations in the NER.
7.1.4	10.2.1	<p>Clause 10.2.1 provides that distributors do not incur any civil monetary liability to an embedded generator for any partial or total failure to take supply of electricity unless the failure is due to an act or omission done or made by the distributor due to negligence or bad faith.</p> <p>Change: This new provision is modelled on rule 147B of the NERR which gives immunity for partial or total failure to supply energy except where due to negligence or bad faith. It has been incorporated to harmonise our code with recent national reforms on access, pricing and incentive arrangements for Distributed Energy Resources (DER). The immunity applies to existing deemed distribution contracts but does not affect any rights or obligations that have accrued under such contracts.</p>
NA	10.2.2	Clause 10.2.2 provides that a distributor may enter into an agreement with an embedded generator (other than a small embedded generator) to vary or exclude the operation of the immunity granted by clause 10.2.1.
NA	10.2.3	This clause clarifies that the immunity provided under clause 10.2 does not apply to distributor or an officer or employee of a distributor exercising a system operations function or power (see added definition below).
7.2	21.3	This clause specifies the frequency of supply that embedded generators must meet and has been moved to Part 3, Section 21: Embedded Generators. No material change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
7.3	21.4	This clause deals with the co-ordination and compliance with standards of embedded generating units connected to a distribution system and has been moved to Part 3, Section 21: Embedded Generators. Change: Clause 20.3(a)(2) now refers to the Electricity Safety (General) Regulations 2019; clauses 20.4.2 and 20.4.3 have been separated from clause 20.4.1 as they deal with distinct matters (disconnection by distributors or by embedded generators).
7.4	21.5	This clause specifies minimum requirements for embedded generating units (synchronous type) and has been moved to Part 3, Section 21: Embedded Generators. Change: The clause is made applicable only to embedded generating units whose generating capacity is over 5 MW.
7.5	21.6	This clause specifies negative sequence voltage that embedded generators must meet and has been moved to Part 3, Section 21: Embedded Generators. No material change.
7.6	21.7	This clause requires embedded generators to ensure that harmonic distortion levels in supplied voltage are within system standards and has been moved to Part 3, Section 21: Embedded Generators. Change: Insertion of clause 21.7.3 to provide for a distributor to allocate current harmonic distortion limits for an embedded generator according to AS 61000.3 to reduce harmonic levels in the voltage for the purpose of maintaining proper operation of a REFCL.
7.7	21.8	This clause prohibits embedded generating units causing inductive interference above specified limits and has been moved to Part 3, Section 21: Embedded Generators. No change.
7.8	21.9	This clause requires embedded generators to design and operate generating units to not exceed specified fault levels and has been moved to Part 3, Section 21: Embedded Generators. No material change.
7.9	Deleted	This clause had required distributors to maintain a register of embedded generators and has been deleted as redundant with AEMO's register under NER clause 3.7E and distributor publication obligations under NER cll 5.18B.2 and 5A.D.1A.
NA	5	This is a new clause entitled 'Contestable Services' and reflects what is currently provided by operation of commission's Guideline 14: Provision of services by electricity distributors and the distribution licences regarding contestable services.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
NA	5.1	This is a new clause that provides a simplified outline identifying contestable services for purposes of the NER.
NA	5.2	This is a new clause identifying those contestable services related to distribution network augmentations for which a distributor must call for tenders. This reflects what is currently provided by operation of Guideline 14 (proposed to be repealed) and the distribution licences (proposed to be varied).
NA	5.3	This is a new clause that requires distributors to develop tendering policies that include elements specified by the clause. This reflects what is currently provided by operation of Guideline 14 (proposed to be repealed) and the distribution licences (proposed to be varied).
NA	5.4	This is a new clause requiring distributors publish their tendering policies or provide them on request and obligating distributors to notify the commission of any changes to those policies. This reflects what is currently provided by operation of Guideline 14 (proposed to be repealed) and the distribution licences (proposed to be varied).
8	22	This clause deals with distributors' emergency response plans and has been moved to Part 4, Section 22: Emergency Response Plans.
NA	22.1	This is a new clause and provides a simplified outline of the requirements of Part 4, Section 22: Emergency Response Plans.
8.1	22.2	This clause requires distributors to develop and test emergency response plans and has been moved to Part 4, Section 22: Emergency Response Plans. No change.
8.2	22.3	This clause requires distributors to comply with AEMO's Single Industry Spokesperson protocol for Victoria and has been moved to Part 4, Section 21: Emergency Response Plans. No material change
NA	23	This is a new section , entitled 'Regulatory reviews', in Part 4, Administrative Provisions.
NA	23.1	This is a new clause and provides a simplified outline of the requirements in Part 4, Section 23: Regulatory Reviews.
NA	23.2	This is a new clause and provides for commission approval of independent reviewers appointed by distributors to review their compliance with their licence, the EDCOP or the industry act and report to the commission. It is proposed that it will replace the existing licence condition pertaining to regulatory audits (distribution licence condition 24).
NA	24	This is a new section , entitled 'Standards and Procedures', in Part 4, Administrative Provisions.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
NA	24.1	This is a new clause and provides a simplified outline of the requirements in Part 4, Section 24: Standards and Procedures.
NA	24.2	This is a new clause and provides for the development, issuance and review of standards and procedures specified by the commission. It is proposed that it will replace the existing licence condition pertaining to standards and procedures (distribution licence condition 23). Sub-clause 24.2.4 specifies the potential scope and content of standards and procedures that may be developed.
9	25	This clause deals with the provision of information by distributors to customers, as well as distributor requests for information from customers and has primarily been moved to Part 4, Section 25: Provision of Information.
NA	25.1	This is a new clause and provides a simplified outline of the requirements in Part 4, Section 25: Provision of Information.
9.1.1	13.2.3	This clause requires distributors to provide information about their reliability targets to customers and retailers on request and has been moved to Part 2, Section 13: Reliability Targets. No material change.
9.1.2	25.2	This clause required distributors to provide their Customer Charter to customers and the commission and specifying the contents of the Charter. Change: The content of the Charter duplicates the information that must be published by a distributor on its website (in accordance with new clause 25.2.1). This new clause has been inserted for consistency with clause 80 of NERR to update and streamline distributors' obligations concerning provision of information.
9.1.2A	13.3.2	This clause requires distributors to provide written information to customers related to maintenance of supply, emergencies and restoration after interruptions and the distributor's contact details and website address annually and has been moved to Part 2, Section 13: Reliability Targets. No change.
9.1.3	25.2.2	This clause specified the required contents of distributors' Customer Charter and has been removed. See comments in relation to clause 9.1.2.
NA	25.4	This is a new clause that requires a distributor to publish information on its website about small embedded generators. Clause 25.4.1 requires distributors to publish information about technical requirements for small generator connections and related information such as the use of remote control equipment and information about export limits. The information must be in plain language.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		Change: This clause has inserted for consistency with clause 147A of the NERR. It has been incorporated to update and harmonise our code with recent national reforms on access, pricing and incentive arrangements for Distributed Energy Resources (DER).
9.1.3A	25.4.1(j)	This clause specifies information that distributors must provide to small embedded generators on initial connection and at 3-year intervals thereafter and has been moved to Part 4, Section 25: Provision of Information. Change: This clause has been incorporated into the information which a distributor must publish on its website under new clause 25.4.1 as this is a more practical and effective way to provide information than advising owners of small embedded generators at three-year intervals. Item (j) has been added to 25.4.1 specifying the circumstances in which the distributor has the right to disconnect unsafe small embedded generators.
9.1.4	Deleted	This clause required distributors to provided copies of the Electricity Distribution Code on request and has been deleted .
9.1.5	25.3.1	This clause requires distributors to provide, upon request by a customer or a retailer on behalf of a customer, information on the quality of supply generally within 10 business days and has been moved to Part 4, Section 25: Provision of Information. No material change.
9.1.6	13.3.3	This clause requires distributors to provide information on the reliability of supply upon request by any customer, or any retailer on behalf of a customer, generally within 20 business days of the request; the clause has been moved to Part 2, Section 13: Reliability Targets. No material change.
9.1.7	25.3.2	This clause allows a distributor to impose a charge if it is required to undertake a test to determine a customer's quality of supply and has been moved to Part 4, Section 25: Provision of Information. No material change.
9.1.8	25.3.3	This clause specifies actions a distributor must take if a test undertaken under clause 25.3.2 determines that the distributor is not complying with its obligations under the EDCOP and has been moved to Part 4, Section 25: Provision of Information. No material change.
NA	25.5	This is a new clause relating to the provision of information about equipment to customers, upon customers' request.
9.1.9	25.5.1	This clause specifies what information a distributor must provide, upon request by a customer, about the distributor's requirements in relation to any proposed new or changed electrical installation and has been moved to Part 4, Section 25: Provision of Information. No material change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
9.1.10	25.5.2	This clause requires distributors to provide advice, upon request, regarding facilities required to protect the distributor's equipment and other information and has been moved to Part 4, Section 25: Provision of Information. No material change.
NA	25.6	This is a new clause relating to information regarding disconnection and reconnection.
9.1.11	25.6.1	This clause requires distributors to install, maintain and make available to retailers a system facilitating timely electronic transfer of information regarding connection, disconnection or reconnect of supply and has been moved to Part 4, Section 25: Provision of Information. No material change.
NA	25.7	This is a new clause dealing with Retailer of Last Resort obligations and has been moved from distributor licences (condition 16) to the EDCOP.
9.1.12	25.8	This clause requires distributors to provide access to multi-lingual services and has been moved to Part 4, Section 25: Provision of Information. To modernise the language, 'multi-lingual services' has been replaced with 'interpreter services'. No material change.
9.1.13	25.6.2	This clause requires distributors to leave, at a supply address that is disconnected upon a customer vacating, a document provided by the commission that sets forth certain information and has been moved to Part 4, Section 25: Provision of Information. No change.
9.1.13.1	25.6.3	This clause provides that clause 25.6.2 does not apply where disconnection occurs remotely and has been moved to Part 4, Section 25: Provision of Information. No change.
NA	25.6.4	This is a new clause that provides that clauses 25.6.2 and 25.6.3 apply to exempt distributors .
9.1.14	25.9	This clause requires distributors to provide specified information regarding REFCL operation to customers connected to parts of the distribution system that may experience a REFCL condition and has been moved to Part 4, Section 25: Provision of Information. No change.
9.2	7.4	This clause requires a customer to inform its distributor or retailer of specified changes to the customer's use of energy or of changes to the customer's electrical installation and has been moved to Part 2, Section 7: Customer Obligations. No change.
9.3	25.10	This clause deals with the provision of certain planning information and has been moved to Part 4, Section 25: Provision of Information. No change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
9.3.1	25.10.1	This clause requires distributors to provide, on request, details of loads connected or to be connected to the distribution system and has been moved to Part 4, Section 25: Provision of Information. No change.
9.3.2	25.10.2	This clause requires a distributor to provide, on request from another distributor, information regarding a point of common coupling need by the other distributor and has been moved to Part 4, Section 25: Provision of Information. No change.
9.4	Deleted	This clause dealt with distributor obligations handling confidential information and has been deleted to avoid conflict and inconsistency with NER clause 8.6.
9.5	Deleted	This clause dealt with distributor obligations of confidence regarding customer details for purpose of enabling electronic communication and has been deleted to avoid conflict and inconsistency with the NER.
10	18	This clause deals with handling customer complaints and dispute resolution and has been moved to Part 2, Section 18: Complaints and Dispute Resolution. No change.
NA	18.1	This is a new clause setting out a simplified outline of obligations in Part 2, Section 18: Complaints and Dispute Resolution.
NA	18.2	This is a new clause entitled 'How Distributors Must Handle Customer Complaints'
10.1.1	18.2.1	This clause specifies how distributors must handle customer complaints and has been moved to Part 2, Section 18: Customer Complaints and Dispute Resolution. Change: For consistency with the NER, the clause specifies compliance with the 'Australian Standard AS ISO 10002:2018 (Quality management - Customer satisfaction – Guidelines for complaints handling in organisations).
10.1.2	18.2.2	This clause specifies information a distributor must provide when responding to a customer complaint and has been moved to Part 2, Section 18: Customer Complaints and Dispute Resolution. No material change.
10.1.3	18.2.3	This clause requires distributors to include contact details for EWOV on any disconnection warning notice and has been moved to Part 2, Section 18: Customer Complaints and Dispute Resolution. No material change.
10.1.4	18.2.4	This clause deals with exempt distributors' complaint handling and dispute resolution procedures and has been moved to Part 2, Section 18: Customer Complaints and Dispute Resolution. Change: This clause has been amended to provide that clauses 18.2.1, 18.2.2(a) and 18.2.3 apply to exempt distributors .

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
NA	18.3	This is a new clause that provides that distributors must, when responding to a connection request, give information to the customer or retailer advising that disputes regarding connection are resolved by the AER under NER (Vic) Ch 5A, Part G.
11	15	This clause is entitled 'Non-Compliance with the Code' and has been moved to Part 2, Section 15: Non-Compliance by distributors and customers. No material change.
NA	15.1	This is a new clause and provides a simplified outline of the requirements of Part 2, Section 15: Non-compliance by distributors and customers.
11.1	15.2	This clause is entitled 'Distributor's Obligation to Remedy' and has been moved to Part 2, Section 15: Non-Compliance by distributors and customers. No change.
11.2.1	15.2.1	This clause requires a distributor to remedy a breach of the EDCOP as soon as practicable and has been moved to Part 2, Section 15: Non-Compliance by distributors and customers. No material change.
1.4.2	15.2.2	See comments regarding clause 1.4.2 above.
11.2	15.3	This clause requires distributors to give notification to a customer of non-compliance likely to have a material adverse impact on a customer and has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
NA	15.4	This is a new clause entitled 'Non-Compliance by Customers'.
1.4.1	15.4.1	See comments regarding clause 1.4.1 above.
11.2.2	15.4.2	This clause requires distributors to notify customers of a customer's non-trivial breach of the EDCOP and specifies the contents of that notice. The clause has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
11.3	15.4.3	This clause requires customers to use best endeavours to remedy their non-compliance with the EDCOP and has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
1.5	15.5	See comment regarding clause 1.5 above. This clause deals with a tenant's obligations and has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No change

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
1.5.1	15.5.1	This clause requires a tenant to use best endeavours to have the owner or other responsible for the supply address to remedy a non-compliance the tenant cannot remedy and has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
1.5.2	15.5.2	The clause requires a tenant to provide evidence of his or her best endeavours in response to a distributor request and has been moved to Part 2, Section 15: Non-Compliance by Distributors and Customers. No material change.
12	16	This clause deals with disconnection of supply and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
NA	16.1	This is a new clause that provides a simplified outline of the circumstances in which a distributor is permitted to disconnect supply or is prohibited from disconnecting supply.
12.1	16.2.1	This clause specifies the circumstances in which a distributor may disconnect supply in response to customer non-compliance, specifies notice requirements that must be met prior to disconnection, and has been moved to Part 2, Section 16: Disconnection of Supply. No material change.
NA	16.2.2	This is new clause that specifies that clause 16.2.1 applies to exempt distributors .
12.2	16.3	This clause deals with disconnection for health, safety or emergency and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
12.2.1	16.3.1	This clause specifies the circumstances in which a distributor may disconnect supply for reasons of health, safety or emergency and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
12.2.2	16.3.2	This clause specifies notice requirements that must be met prior to disconnection for health or safety reasons and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
NA	16.3.3	This is new clause that specifies that clauses 16.3.1 and 16.3.2 apply to exempt distributors .
12.3	16.4	This clause specifies the circumstances in which a distributor may disconnect supply in response to a retailer's request and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
12.3(a)	16.4.1	This clause identifies the circumstances in which a distributor must not disconnect supply in response to a retailer's request and has been moved to Part 2, Section 16: Disconnection of Supply.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		Change: The clause has been amended to expressly permit a distributor to decline a retailer's disconnection request where it has reasonable grounds to suspect the retailer has requested disconnection in circumstances where the retailer is prohibited from arranging disconnection under the EI Act. The amendment reflects changes to the EI Act resulting from the Energy Legislation Amendment (Energy Fairness) Act 2021.
12.3(b)	16.4.2	This clause obligates distributors to use best endeavours to disconnect supply, subject to the restrictions in clause 16.7, where they have received a valid retailer request and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
NA	16.4.3	This is a new clause that notes that clause 16.4.2 does not apply to a request for disconnection at a scheduled time.
NA	16.4.4	This is new clause that specifies that clauses 16.4.1 and 16.4.2 apply to exempt distributors .
12.4	16.5	This clause specifies the circumstances in which a distributor disconnects supply in response to a customer's request and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
12.4(a)	16.5.1	This clause requires distributors to use best endeavours to disconnect supply where requested by a customer and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
12.4(b)	16.5.2	This clause requires distributors to use best endeavours to disconnect supply within 2 hours of a customer's request where remote disconnection is possible and has been moved to Part 2, Section 16: Disconnection of Supply. No material change.
12.4(c)	16.5.3	This clause notes that clause 16.5.2 does not apply to a request for disconnection at a scheduled time and has been moved to Part 2, Section 16: Disconnection of Supply. No material change.
NA	16.5.4	This is new clause that specifies that clauses 16.5 applies to exempt distributors .
12.5	16.6	This clause specifies the circumstances in which a distributor disconnects supply illegally obtained and has been moved to Part 2, Section 16: Disconnection of Supply. No change.
12.5(a)-(d)	16.6.1	These sub-clauses specify the circumstances in which a distributor disconnects supply illegally obtained and have been moved to Part 2, Section 16: Disconnection of Supply. No change.
NA	16.6.2	This is a new clause that specifies that clause 16.6 applies to exempt distributors .

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
12.6	16.7	This clause specifies the circumstances in which a distributor must not disconnect supply and has been moved to Part 2, Section 16: Disconnection of Supply. No material change.
12.6.1	16.7.1	This clause specifies that, except in case of emergency, a distributor must not disconnect supply outside specified times and days and has been moved to Part 2, Section 16: Disconnection of Supply. No material change.
12.6.2	16.7.2	This clause specifies the circumstances in which a distributor must not disconnect supply and has been moved to Part 2, Section 16: Disconnection of Supply. No material change.
NA	16.7.3	This is new clause that specifies that clause 16.7 applies to exempt distributors .
13	17	This clause deals with reconnection of supply and has been moved to Part 2, Section 17: Reconnection of Supply. No material change.
NA	17.1	This is a new clause that provides a simplified outline of a distributor's obligation to reconnect a customer after disconnection.
13	17.2	This clause outlines the circumstances in which a distributor must reconnect supply and has been moved to Part 2, Section 17: Reconnection of Supply. No material change.
13.1.1	17.2.1	This clause outlines the circumstances in which a distributor must reconnect supply and has been moved to Part 2, Section 17: Reconnection of Supply. Change: Prior reference to defined expression “approved statement of charges” is amended to refer to “the approved pricing proposal,” to reflect the decision the AER makes each year under NER clause 6.18.
13.1.2	17.2.2	This clause specifies the time frame within which a distributor must reconnect supply and has been moved to Part 2, Section 17: Reconnection of Supply. Change: Redrafted to improve clarity of existing obligation, no material change to the timing by which a distributor is required to reconnect a customer.
13.1.3	17.2.3	This clause provides for a distributor and customer to agree to a later time than required under clause 17.2.2 and has been moved to Part 2, Section 17: Reconnection of Supply. No material change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
13.1.4	17.2.4	This clause provides that a distributor is not obliged to reconnect a customer's supply unless it reasonably believes it is safe to do so. No material change.
NA	17.2.5	This is a new clause that specifies that clauses 17.2 applies exempt distributors .
14	6	This section deals with metering. No material change.
NA	6.1	This is a new clause and provides a simplified outline of distributor and customer obligations related to metering.
14	6.2.1	This clause requires distributors and customers to comply with applicable metering codes and has been moved to Part 2, Section 6: Metering. Change: Clause 6.2.1 refers to compliance with applicable metering codes, which is defined to include the following instruments about metrology – National Electricity Rules, Metrology Procedure and Electricity Customer Metering Code of Practice. The commission will review the Electricity Customer Metering Code of Practice separately.
NA	6.2.2	This is a new clause requiring a distributor to comply with its obligations as metering coordinator, metering provider or metering data provider if appointed as such under the NER.
NA	6.2.3	This is a new clause that provides that clause 6.2.1 applies to exempt distributors .
15	Deleted	This section dealt with additional distribution charges and has been deleted because distributors no longer submit statements of charges for the commission's approval and the AER approves all charges associated with reconnection.
NA	8	This is a new section entitled Use of System Agreements with Retailers.
NA	8.1	This is a new clause that provides a simplified outline of a distributor's obligations to enter into use of system agreements with each retailer and the requirements related to a distributor's invoicing of network charges to retailers.
NA	8.2	This is a new clause dealing with commission approval of proposed default use of system agreements (UoSAs).
NA	8.2.1	This is a new clause that provides for the commission to direct a distributor to submit for its approval a proposed default UoSAs and is based on distributor licence conditions 4.1 to 4.3, which in turn is proposed to be removed from those licences.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
NA	8.2.2	This is a new clause that provides that the commission may approve, approve with amendments, or not approve a distributor's default UoSA.
NA	8.2.3	This is a new clause that provides that if the commission has not acted on a distributor's proposed default UoSA within a specified period, the agreement is deemed approved.
NA	8.3	This is a new clause that provides for distributors and retailers to negotiate written UoSAs that contain provisions different from approved default UoSA and is based on distributor licence condition 4.5, which in turn will be removed from those licences.
NA	8.4	This a new clause that requires distributors to comply with commission directions to amend its default UoSA and is based on distributor licence condition 4.7, which in turn will be removed from those licences.
NA	8.5	This is a new clause that requires distributors, upon request from a retailer, to offer to enter into a written UoSA in the form of the default UoSA and is based on distributor licence conditions 4.4 and 4.8, which in turn will be removed from those licences.
NA	8.6	This is a new clause requiring distributors to notify the commission if it gives notice to terminate a retailer's UoSA and prohibits the distributor from terminating the UoSA if the commission so directs to terminate and is based on distributor licence condition 4.9, which in turn will be removed from those licences.
NA	8.7	This is a new clause specifying the terms and conditions that must be included in any UoSA and is based on both distribution licence condition 4.6, which in turn will be removed from those licences, and clause 3.4.3 of Guideline 5, which will be repealed.
NA	8.8	This is a new clause entitled 'Distributor Must Provide Statement of Charges'.
NA	8.8.1	This is a new clause that requires a distributor to provide a statement of charges to a retailer that includes network charges for each shared customer's supply address and specifies the required content of that statement.
NA	8.8.2	This is a new clause that requires the statement of charges to be provided to a retailer by no later than the 10 th business day of the next retail billing period and, subject to Retail Marketing Procedures, in a format either as agreed or reasonably determined by the distributor.
NA	8.9	This is a new clause entitled 'Charges that a Distributor Can and Cannot Recover'.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
15A.1.1	8.9.1	This clause prohibits a distributor from recovering charges from a retailer that the retailer is not permitted to recover from a customer under ERCOP clause 70(2) and has been moved to Part 2, Section 8: Use of System Agreements with Retailers. No material change.
15A.1.2	8.9.2	This clause provides that clause 8.9.1 does not apply where the reason the retailer cannot recover the charge is due to retailer's fault and has been moved to Part 2, Section 8: Use of System Agreements with Retailers. No material change.
NA	8.9.3	This is a new clause that provides that clause 8.9 applies to exempt distributors .
15A	8.10	This clause deals with the adjustment of network charges and has been moved to Part 2, Section 8: Use of System Agreements with Retailers.
15A.1.3	8.10.1	This clause permits a distributor to adjust a statement of charges provided to a retailer to account for any errors, corrections or substitutions in data and has been moved to Part 2, Section 8: Use of System Agreements with Retailers. No material change.
15A.1.4	8.10.2	This clause provides that any adjustment may be made by including the amount required to be paid or credited in a subsequent statement of charges accompanied by an explanation of the adjustment and has been moved to Part 2, Section 8: Use of System Agreements with Retailers. No change.
NA	9	This is a new section entitled 'Deemed Distribution Contracts with Customers'.
NA	9.1	This is a new clause that provides a simplified outline of procedures for distributors to obtain commission approval of terms and condition of deemed distribution contracts.
NA	9.2	This is a new clause that requires distributors to submit proposed terms and conditions of a deemed distribution contract for commission approval and to give notice of approved terms and conditions, and is based on distribution licence conditions 5.1 and 5.3, which in turn will be removed from those licences.
16	9.3	This clause deals with terms and conditions related to distributor liability that may, or must not, be included in a deemed distributor contract. The clause has been moved to Part 2, Section 9: Deemed Distribution Contracts with Customers. No change.
16(a)	9.3.1	This clause prohibits distributors from including any term or condition limiting the distributor's liability for breach of contract or negligence in a deemed distribution contract and has been moved to Part 2, Section 9: Deemed Distribution Contracts with Customers. No change.

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
16(b)(1)	Deleted	This clause has been deleted as it no longer has any operation given operation of Part 3-2, Div 1 of the Australian Consumer Law (the ACL), sections 64, 64A and 65 of the ACL.
16(b)(2)	9.3.2	This clause identifies the kinds of terms and conditions that distributors may include in deemed distribution contracts and has been moved to Part 2, Section 9: Deemed Distribution Contracts with Customers. Change: The clause has been amended to refer to the EDCOP, NEL and NER and to add an explanatory note referring to NEL s 120.
16(c)	9.3.3	This clause deals with a business customer's responsibility to take reasonable precautions to minimise the risk of loss or damage from various conditions on the distribution system and has been moved to Part 2, Section 9: Deemed Distribution Contracts with Customers. Change: Clarifies that a distributor's liability to business customers is reduced to the extent the customer fails to take reasonable precautions and to include an explanatory note referring to exclusion of a distributor's liability to an embedded generator under EDCOP clause 10.2 during a permitted supply interruption.
17	9.4	This clause limits distributors' use of indemnity clauses in deemed distribution contracts and has been moved to Part 2, Section 9: Deemed Distribution Contracts with Customers. No material change.
18	9.5	This clause deals with the consequences of <i>force majeure</i> events on a distributor's liability and has been moved to Part 2, Section 9: Deemed Distribution Contracts with Customers. Change: The clause has been amended to provide for deemed notification of <i>force majeure</i> events by internet publication and/or SMS.
19	2.1	This clause sets out definitions of important terms used in the EDCOP and has been moved to Part 1, Section 2: Interpretation. Change: As summarised below, definitions have been added, amended and deleted: Additions: <ul style="list-style-type: none"> • <i>AER Distribution Reliability Measures Guideline</i> (standardises definitions of SAIDI, SAIFI, MAIFI and CAIDI)

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		<ul style="list-style-type: none"> • <i>approved pricing proposal</i> (added to recognise AER price regulation) • <i>connection</i> (inserted for clarity) • <i>connection contract</i> (added to better align EDCOP clause 3 with NER Chapters 5A and 5) • <i>connection request</i> (added to better align EDCOP clause 3 with NER Chapters 5A and 5) • <i>connection service</i> (added as a consequence of new clause 5.2.1) • <i>default use of system agreement</i> (inserted to reflect UoSA provisions imported from distribution licences) • <i>disconnect</i> (inserted for clarity) • <i>disconnection warning notice</i> (inserted to refer to warning notices required under EDCOP section 15) • <i>distribution determination</i> (recognises AER price regulation) • <i>electricity laws</i> (inserted for clarity) • <i>energy ombudsman</i> (added for clarity) • <i>exempt generator</i> (inserted for clarity) • <i>exempt retailer</i> (substitutes <i>exempt person</i> to avoid any confusion with other exempt persons) • <i>Guaranteed service levels</i> (inserted for clarity in light of new provisions) • <i>high voltage</i> (inserted to clarify the term used in the EDCOP) • <i>large customer</i> (added as a consequence of new clause 1.5) • <i>low voltage</i> (inserted to clarify the term used in the EDCOP) • <i>major event day</i> (added for clarity) • <i>National Electricity Law</i> (added for clarity) • <i>network charges, retail billing period, retail market procedures, shared customer, statement of charges</i> (inserted, as material terms used in section 8 of the EDCOP) • <i>nominal voltage</i> (inserted to clarify the term used in the EDCOP) • <i>normal operating frequency band</i> (added as this term is used in section 20 of the EDCOP) • <i>planned interruption</i> (replaces formerly defined term <i>distributor planned interruption</i>) • <i>protection equipment</i> (added for clarity) • <i>public lighting services</i> (added as a consequence of new clause 5.2.1) • <i>reconnection</i> (added for clarity) • <i>relevant authority</i> (added as a consequence of amendment to new clause 11.2.1(d)) • <i>repeated claims</i> (added as a consequence of moving guideline 11 to be Schedule 4 of the EDCOP) • <i>residential customer</i> (replaces term 'domestic customer')

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		<ul style="list-style-type: none"> • <i>review</i> (added to reference formal assessments of distributor practices by the commission) • <i>small embedded generating unit</i> (to clarify definition of small embedded generator) • <i>system operations function or power</i> (inserted as a consequence of new clause 10.2 and aligns with NEL) • <i>unauthorised voltage variation</i> (added as a consequence of moving guideline 11 to be Schedule 4 of the EDCOP) • <i>undergrounding</i> (added as a consequence of new clause 5.2.1) • <i>unplanned interruption</i> (added to align with section 10 of the EDCOP) • <i>use of system agreement</i> (added to align with provisions of section 8 of the EDCOP) • <i>voltage variation compensation cap</i> (added as a consequence of moving guideline 11 to be Schedule 4 of the EDCOP) <p>Amendments:</p> <ul style="list-style-type: none"> • <i>acceptable identification</i> (updated and standardised with the definition in the Energy Retail Code of Practice) • <i>augmentation</i> (deletes reference to 'distribution fixed assets' and standardised with definition in the NEL) • <i>best endeavours</i> (updated definition to reflect its interpretation by courts) • <i>CAIDI, MAIFI, SAIDI and SAIFI</i> (standardised with reference to the AER Distribution Reliability Measures Guideline) • <i>CBD feeder</i> (reflects deletion of <i>CBD</i> and related terms) • <i>confirmation reminder notice</i> (includes definition rather than reference to code) • <i>connect</i> (omits reference to 'reconnect' which is now defined separately) • <i>deregister</i> and <i>deregistration notice</i> (reflects revised life support provisions) • <i>electrician</i> (updated reference to the Electricity Safety Act 1998) • <i>Electricity Customer Metering Code of Practice</i> (reflects it is a code of practice) • <i>embedded generator</i> (amended for clarity) • <i>emergency</i> (updated to refer to the definition under the Emergency Management Act 2013) • <i>energise</i> (simplified) • <i>explicit informed consent</i> (requirements for effective EIC have been included in the definition to avoid repetition in the body of the EDCOP) • <i>GSL payment</i> (simplified to correspond to 'guaranteed service levels') • <i>harmonic distortion</i> (amended from 'total harmonic distortion' to correspond to wording of EDCOP provisions) • <i>Market Settlement and Transfer Solution Procedures</i> (provides explanatory language rather than reference to NER) • <i>meter</i> (removed capitalisation) • <i>metering data</i> (simplified definition by referring to the NER, rather than to the Energy Retail Code of Practice)

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		<ul style="list-style-type: none"> • <i>point of supply</i> (simplified definition by referring to the Electricity Safety Act 1998) • <i>retail licence</i> (omits reference to “wholesale electricity market”) • <i>REFCL</i> or <i>Rapid Earth Fault Current Limiter</i> (updated to conform with Energy Safe Victoria’s role in accepting or determining a bushfire mitigation plan) • <i>small embedded generator</i> (consequential to amendment to definition of small embedded generating unit) • <i>small embedded generating unit</i> (updated to remove reference to 2kW legacy threshold) • <i>special meter read</i> (refers to Code “of Practice”) • <i>statement of charges</i> (refers to Code “of Practice”) • <i>supply</i> (adds “and includes the delivery of electricity to or from a supply address or point of connection” to make clear that the EDCOP extends to 2-way, rather than one-way, supply of electricity) • <i>system</i> (replaces “network” with “interconnected national electricity system”, as that is the expression used in the NEL) <p>Deletions:</p> <ul style="list-style-type: none"> • <i>CBD</i> (was only relevant to CitiPower under former clause 3.1A, which has been moved to its licence) • <i>CBD security of supply upgrade plan</i> (was only relevant to CitiPower under former clause 3.1A, which has been moved to its licence) • <i>certificate of electrical safety</i> (redundant) • <i>confidential information</i> (redundant) • <i>domestic customer</i> (replaced with residential customer) • <i>date of receipt</i> (redundant) • <i>distribution area</i> (redundant) • <i>distribution fixed assets</i> (redundant) • <i>distributor planned interruption</i> (replaced with “<i>planned interruption</i>” throughout EDOCP) • <i>electrician</i> (redundant) • <i>Electricity System Code</i> (redundant) • <i>interval meter</i> (redundant) • <i>Melbourne CBD distributor</i> (redundant) • <i>price determination</i> (reflects AER price regulation) • <i>regulatory test</i> (redundant) • <i>rural area</i> (redundant)

EDCOP clause (current)	EDCOP clause (proposed)	Description of amendment
		<ul style="list-style-type: none"> <i>wholesale market</i> (redundant)
20	2	This clause provides a glossary of defined terms and principles applicable to interpretation of the EDCOP's provisions and has been moved to Part 1, Section 2: Interpretation. No material change.
20.1.2	2.2	This clause deals with customer requests and agreements and clarifies that such requests or agreements may be made by the customer's authorised agent or representation. No material change.
NA	2.3	This is a new clause that specifies the accepted modes of giving written notice or other communications and has been moved to Part 1, Section 2: Interpretation.
21	Schedule 5	This clause contained several transitional provisions and has been deleted because it is obsolete. New transitional provisions have been included in Schedule 5 .
NA	Schedule 1	This is a new Schedule 1 that identifies those provisions of the EDCOP that are civil penalty requirements for purposes of the Essential Services Commission Act 2001.
Schedule 1	Schedule 2	This Schedule provides specific information regarding the quality of supply and has been moved to Schedule 2. No change.
Schedule 2	Schedule 3	This Schedule provides specific information regarding standard nominal voltage limits that apply for low voltage supply from distribution systems and has been moved to Schedule 3. No change.
NA	Schedule 4	This is a new Schedule that incorporates the requirements and procedures, formerly set forth in Guideline 11: Electricity Industry – Voltage Variation Compensation, related to compensation that must be paid by distributors for voltage variations that exceed specified limits and consequently damage any person's property.