

7 May 2025

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

By email: [energyreform@esc.vic.gov.au](mailto:energyreform@esc.vic.gov.au)

Dear Energy reform team,

**Consultation on the revocation of Electricity Customer Transfer Code and Electricity Customer Metering Code**

CitiPower, Powercor and United Energy welcome the opportunity to provide feedback on the Essential Services Commission's consultation paper regarding the proposed revocation of the *Electricity Customer Transfer Code of Practice* (Transfer Code) and the *Electricity Customer Metering Code of Practice* (Metering Code).

We support the proposed revocation of these Codes, as their original regulatory purpose and functions have been subsumed by the National Electricity Rules (Rules) and other regulatory instruments.

Please find below our response to the specific questions raised in the consultation paper:

**Electricity Customer Transfer Code of Practice**

**Q1. Do you have any concerns regarding the proposed revocation of the Transfer Code or the Metering Code? Please elaborate.**

We have no concerns regarding the proposed revocation of the Transfer Code.

**Q2. Are there any provisions in the Transfer Code or Metering Code we should consider retaining? Please elaborate.**

There are no provisions that we consider necessary to retain, as all relevant requirements are already addressed through Australian Energy Market Operator (AEMO) procedures.

**Q3. Do you anticipate any potential impact to industry associated with revoking the Transfer Code or the Metering Code? Please elaborate.**

We do not anticipate any impact to industry resulting from the revocation of the Transfer Code.

## Electricity Customer Metering Code of Practice

**Q1. Do you have any concerns regarding the proposed revocation of the Transfer Code or the Metering Code? Please elaborate.**

We have no concerns regarding the proposed revocation of the Metering Code.

**Q2. Are there any provisions in the Transfer Code or Metering Code we should consider retaining? Please elaborate.**

We do not consider any provisions in the Metering Code necessary to retain.

**Q3. Do you anticipate any potential impact to industry associated with revoking the Transfer Code or the Metering Code? Please elaborate.**

We do not anticipate any significant impact to industry from the revocation of the Metering Code.

Please let us know if you require any further information or clarification. We appreciate the opportunity to engage on this consultation.

If you have any questions, please do not hesitate to contact Gaya Patel on [REDACTED] or at [REDACTED]

Yours sincerely,

[REDACTED]

Simran Kaur  
Manager Compliance  
**CitiPower, Powercor and United Energy**