

6 May 2025

Mr Nathan Zhivov
Executive Director, Energy Division
Essential Services Commission
Melbourne, VIC, 3000

Lodged via email: energyreform@esc.vic.gov.au

Jemena Electricity
Networks (Vic) Ltd
ABN 82 064 651 083

Level 16, 567 Collins Street
Melbourne, VIC 3000
PO Box 16182
Melbourne, VIC 3000
T +61 3 9173 7000
F +61 3 9173 7516
www.jemena.com.au

Dear Nathan

Proposed revocation of the Electricity Customer Transfer Code and Electricity Metering Code of Practice – Consultation paper

Jemena Electricity Networks (Vic) Ltd. (Jemena) welcomes the opportunity to respond to the Essential Services Commission's (ESC) consultation paper on the proposed revocation of the Electricity Customer Transfer Code and Electricity Metering Code of Practice.

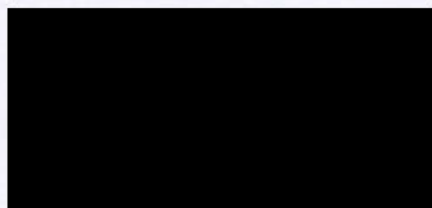
Thank you for the ESC's proactive and timely consideration of this matter. We recognise the value in repealing outdated instruments and obligations to reduce risks of duplication, conflict between rules and other unintended consequences. Streamlining and updating regulatory frameworks also helps reduce the regulatory burden for regulated entities and promotes efficient compliance processes and systems.

We are supportive of the ESC's proposal to revoke the two Codes. We share the ESC's understanding that the Australian Energy Market Operator essentially regulates the obligations in the Transfer Code and Metering Code via the National Electricity Rules (NER), the Market Settlements and Transfer Solutions (MSATS), and Meteorology procedures. Further, and as noted in the consultation paper, other Victorian-specific obligations are already present in the Electricity Distribution Code of Practice, the Energy Retail Code of Practice and various Orders in Council.

We consider that, as far as the existing obligations are concerned, the proposed revocation of the Codes will not impact our costs and, therefore, our customers. Further, the revocation of the Codes would not impact our commitment to practice good asset management in providing services to our customers. We will continue to work to ensure the security and reliability of the electricity supply for customers we serve in the Jemena electricity network area.

Jemena is interested in participating in any targeted consultation the ESC may undertake with key stakeholders before publishing its final decision.

If you have any questions regarding this letter, please feel free to contact Sonia Madamba, Senior Regulatory Advisor, on [REDACTED] or [REDACTED]



Matthew Serpell
Electricity Regulation Manager
Jemena Electricity Networks