



12 May 2025

Sarah Sheppard
Chief Executive Officer
Essential Services Commission of Victoria
Level 8, 570 Bourke Street
Melbourne Victoria 3000

Email: energyreform@esc.vic.gov.au

Dear Ms Sheppard,

Victorian Transfer and Metering Code – Proposed Revocation

Origin Energy (Origin) appreciates the opportunity to provide comment on the Essential Services Commission's (Commission's) review of the Victorian Electricity Customer Transfer Code of Practice (Transfer Code) and the Electricity Customer Metering Code of Practice (Metering Code). We understand that as part of this review, the Commission is considering revoking both Codes, on the basis that they have been superseded by more current regulatory instruments such as the National Electricity Rules (NER) and MSATS and Metrology Procedures.

Origin supports the harmonisation of regulatory frameworks and national consistency, recognising that such alignment reduces regulatory uncertainty and facilitates the more efficient functioning of the energy market. However, it is essential that the ESC confirms there are no Victorian-specific exemptions to the NER that would prevent the appropriate application of the national rules.

Origin's primary concern with the proposed revocation of the Metering Code relates to clause 2.2, which addresses the ownership of metering equipment. While the Commission has advised that this clause is covered under Victorian deemed distribution contracts, it is unclear whether the same level of protection is provided under the Energy Retail Code of Practice (ERCoP). Although ERCoP prohibits customers from tampering with meters, it does not explicitly state that metering equipment does not become the property of the customer. This clause can be relevant to embedded networks and other metering arrangements that can be in place.

A transition period will be necessary to support the alignment between the content of the existing Codes and the national regulatory framework, and to allow sufficient time for industry systems and processes to be appropriately updated. In particular, amendments to the MSATS Procedures will be required to reflect policy decisions—such as the removal of the objection code for debt. These procedures are subject to a scheduled consultation process. Further amendments will also be needed to the Energy Retail Code of Practice to remove references to the revoked Codes.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on [REDACTED] or [REDACTED].

Yours sincerely

A large black rectangular box redacting the signature of Sean Greenup.

Sean Greenup
Group Manager Regulatory Policy