

Public Lighting Code Review: Final Decision

19 November 2025



Acknowledgement

We acknowledge the Traditional Owners of the lands and waterways on which we work and live.

We acknowledge all Aboriginal and Torres Strait Islander communities, and pay our respects to Elders past and present.

As the First Peoples of this land, belonging to the world's oldest living cultures, we recognise and value their knowledge, and ongoing role in shaping and enriching the story of Victoria.

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Summary

- The Essential Services Commission has decided to revoke the Public Lighting Code. Some obligations will be transferred into the Electricity Distribution Code of Practice.
- Many stakeholders (such as electricity distribution businesses and the Victorian Greenhouse Alliance – an alliance of 70 local councils) supported revocation, while retaining some obligations.
- The Public Lighting Code will be revoked on 31 December 2025.
- The retained obligations transferred to the Electricity Distribution Code of Practice will take effect from 1 January 2026.

This paper details our final decision to revoke the Public Lighting Code ('code' or 'the code') and to transfer some relevant obligations to the Electricity Distribution Code of Practice.

This is in line with section 76(3) of the Essential Services Commission Act 2001, which requires the Public Lighting Code to be remade by 31 December 2025 or it will be automatically revoked. Our final decision follows a review of the Public Lighting Code. The review considered if the code is fit for purpose and considered stakeholder feedback on whether obligations remain relevant and need to be retained.

Other instruments covering customer public lighting

We consider that obligations in the Public Lighting Code are sufficiently provided for in the following instruments:

- National Electricity Rules (NER)
- Electricity Distribution Code of Practice (EDCoP).

Our decision to revoke the Public Lighting Code will remove unnecessary overlap and outdated rules it imposes. This will support the operation of the National Electricity Rules and the Electricity Distribution Code of Practice.

Public lighting review consultation feedback

- We received ten submissions.
- Most electricity distribution businesses and the Victorian Greenhouse Alliance (an alliance of 70 local councils) expressed support to revoke the Public Lighting Code but suggested some amendments and additional obligations be retained.
- Some individual public submissions did not support the revocation of the Public Lighting Code. Some of these submissions proposed broader policy changes, additional obligations and improved service standards.

On 28 August 2025, we published a public consultation paper on our review of the code and invited stakeholders to engage with us and provide their written feedback. The consultation paper detailed our proposal to revoke the code while retaining and transferring some relevant obligations to the Electricity Distribution Code of Practice. We also sought feedback on strong reasons to retain any other obligations.

We also consulted the following bodies and government departments:

- Australian Energy Regulator
- Department of Energy, Environment and Climate Action
- Department of Treasury and Finance
- Energy Safe Victoria
- VicRoads (part of the Department of Transport and Planning).

We received ten submissions including four from electricity distribution businesses, two representing local councils and six from individual members of the public. See the submissions on our [website](#).

Introduction

The Public Lighting Code (the code) was published in September 2001 by the Office of the Regulator General. It predates Victoria's adoption of the national electricity regulatory framework.

The code was last reviewed in 2015 when the Guaranteed Service Level (GSL) framework was updated. It was deemed to be a code of practice for the purposes of the Essential Services Commission Act on 1 December 2021.¹

Public lighting framework

The code's framework covers the provision of public lighting activities by electricity distribution businesses. The code focuses on:

- asset management
- service standards
- information provision
- dispute resolution
- negotiation of the public lighting connection process.

Connection to the national regulations

Parts of the code (such as asset management requirements and the connection framework) interact with the National Electricity Rules' distribution network economic regulatory framework (administered by the Australian Energy Regulator). This means the code requires electricity distribution businesses to deliver public lighting services but in accordance with the national economic regulatory framework.²

Obligations under the Public Lighting Code

The code's obligations apply to electricity distribution businesses in their interactions and negotiations with large public lighting customers such as local councils and VicRoads.³

In addition, electricity distribution businesses have ongoing obligations under the code to manage and maintain public lighting service standards. These service standard obligations will continue to apply when they are transferred to the Electricity Distribution Code of Practice.

¹ As per section 76 (1) (h) of the *Essential Services Commission Act 2001*.

² National Electricity Rules, Chapter 6.

³ VicRoads is now part of the Department of Transport and Planning.

Revoking the Public Lighting Code

- The Public Lighting Code will be revoked on 31 December 2025.
- We will retain some obligations, by transferring these to the Electricity Distribution Code of Practice. This will take effect from 1 January 2026.

Reducing regulatory overlap and duplication

Many stakeholder submissions supported our proposal to revoke the code.⁴ They agreed that the code is no longer fit-for-purpose, with many key obligations (such as the connections framework) overlapping or duplicating the national framework.

Other Victorian-specific obligations are also duplicated, including asset management requirements, processes for handling complaints and dispute resolution. Where gaps exist, we will transfer those obligations to the Electricity Distribution Code of Practice. Our consultation paper provided a clause-by-clause analysis of the code to outline our approach to revocation.⁵ It detailed why we considered the obligations within the code are:

- overlapped or duplicated by the national framework or other codes of practice
- outdated
- not relevant.

Our final decision is to revoke the Public Lighting Code.

Some stakeholders suggested three obligations that could be retained. Our final decision is to retain two of those obligations (by transferring them to the Electricity Distribution Code of Practice).

We also considered the costs and benefits of our decision. We expect our proposed changes will reduce costs compared to retaining the entire code. Our final decision reduces regulatory overlap and duplication, gives clarity for industry, and more flexibility that benefits public lighting customers and electricity distribution businesses.⁶

The following sections detail our considerations.

⁴ Submissions from Citipower, Jemena, Powercor, United Energy and the Victorian Greenhouse Alliance (an alliance of 70 local councils)

⁵ See our 28 August 2025 consultation paper, [Appendix A](#).

⁶ We also separately estimated costs as part of our requirements relating to Regulatory Impact Statements. Under that approach, we applied Better Regulation Victoria's *Victorian Guide to Regulation* to inform these estimates, which considers a different base case where the Public Lighting Code is entirely revoked.

Stakeholder support to retain three obligations

In our consultation paper we proposed to revoke the code in its entirety and retain some obligations under the Electricity Distribution Code of Practice. Some electricity distribution businesses,⁷ the Victorian Greenhouse Alliance and the Gannawarra Shire Council submissions suggested that three obligations should be retained and not revoked.

The three obligations relate to:

- Clauses 3.2 and 3.3 - Standard and non-standard fitting product approval processes respectively to support the negotiated connections framework
- Clause 6 - Billing provision to support situations where the lighting assets may not have a retailer assigned. Instead, the distributor offers billing services to the public lighting customer.

Given these views, we have further considered the relevance of these obligations below.

Standard and non-standard fitting obligations complement the national connections framework (National Electricity Rules chapter 5A)

Standard and non-standard fittings

The code uses the terms 'standard' and 'non-standard fittings' in clauses 3.2 and 3.3 respectively. They are used to describe the various standard and non-standard components and parts (for example, the lamps, control equipment, brackets and poles etc.) that makes up the public lighting system.

Many stakeholders expressed support to retain these two obligations.⁸ They consider that these obligations provide more clarity compared to the national connections framework. This helps streamline negotiations when public lighting customers seek to introduce new standard and non-standard fittings with electricity distribution businesses.

We agree with stakeholders' views. These obligations continue to be useful for negotiation between public lighting customers and electricity distribution businesses. They also support the streamlining of current processes for introducing new standard and non-standard products. We also consider these obligations complement the national connections framework.

⁷ Citipower, Powercor and United Energy submission.

⁸ The Victorian Greenhouse Alliance (an alliance of 70 local councils), CitiPower, Powercor and United Energy submissions.

Our final decision is to retain these obligations by transferring them to the Electricity Distribution Code of Practice – as new clauses 19.8 and 19.9. This will take effect from 1 January 2026 (immediately after the code has been revoked).

Billing provision overlaps with the Electricity Industry Act

Distributor billing

Some electricity distribution businesses and the Gannawarra Shire Council suggested we retain and transfer clause 6 of the code into the Electricity Distribution Code of Practice. This clause enables electricity distribution businesses to bill a public lighting customer where no retailer is assigned to specific public lighting assets. Some electricity distribution businesses submitted that such occurrences are relatively uncommon. However, they considered this obligation helps with clarity should such a situation occur.⁹

We have considered this feedback but maintain our approach to revoke this obligation. We highlight the following key factors that support its revocation:

- A retail license is required under the Electricity Industry Act 2000 to sell electricity in Victoria. It is a contravention of the Act to do so without one.
- No licensed electricity distribution business currently holds a retail license (which would permit them to issue a bill to a public lighting customer).

We encourage all electricity distribution businesses to negotiate arrangements with public lighting customers to find a retailer. We will continue to monitor the sector's compliance with this arrangement, considering our compliance and enforcement priorities and approach.¹⁰

⁹ CitiPower, Powercor and United Energy submission

¹⁰ [Our compliance and enforcement approach and priorities](#)

Guaranteed service level payments

The code currently includes a guaranteed service level scheme for public lighting. It provides for a payment of \$25 to a person who reports a public lighting fault (if they live adjacent to the faulty public light and the distributor does not repair the light within 2 business days of being notified).

Several stakeholders suggested changes to the guaranteed service level scheme for public lighting. However, our final decision is not to make any changes to the current scheme.

We note that distributors are proposing bulk replacement of their public lighting with the Australian Energy Regulator, as part of the regulatory determinations for 2026-2031.¹¹ It would be more appropriate to consider broader changes to the guaranteed service level scheme after the fleet of older public lights are replaced.

We describe stakeholders' feedback and our responses further below.

Stakeholder feedback

Electricity distribution businesses suggested increasing the response time to repair faulty public lights, for a person to receive a guaranteed service level payment. CitiPower, Powercor and United Energy suggested the response period be changed from 2 business days to 10 business days, and Jemena suggested it to be 7 business days (to align with the minimum service standard under clause 19.7.1(b)).

However, we consider the current 2 business days response time for a guaranteed service level payment is still appropriate. We note that members of the public have raised poor repair response times by some electricity distribution businesses.¹² Keeping this shorter period highlights to electricity distribution businesses of their on-going responsibilities to deliver appropriate public lighting services.

We note that there is a distinct difference between the guaranteed service level scheme and minimum service standard for public lighting. It is appropriate for the two different obligations to have different response time periods, and for the guaranteed service level scheme to be targeted. Expanding further:

- The **guaranteed service level scheme** provides a recognition payment to a person who first reports a fault (neighbouring their premise), that has not been repaired within 2 business days (of identifying it). This recognises the efforts of a person to support the electricity distribution businesses' obligation to monitor, maintain and repair public lighting. It also recognises the

¹¹ [Sample distributor Powercor bulk public lighting asset replacement proposal to the Australian Energy Regulator.](#)

¹² Individual submissions: Liam Clifford, Christopher Lee and individual 1

potential inconvenience caused to a person most likely impacted by the public lighting fault (namely the property closest to the fault). The guaranteed service level scheme can be enforced, if electricity distribution businesses do not make payment to the person who first reports a fault and resides nearby.

- The **minimum service standard** is a performance standard. It requires electricity distribution businesses to repair faults within 7 business days with public lighting customers (such as local councils, and VicRoads).¹³ This standard also obligates electricity distribution businesses to regularly monitor faulty lights, which is their responsibility (and not members of the general public). This minimum service standard can be enforced, if electricity distribution businesses do not repair the fault in time.

Separate from the electricity distribution businesses' suggestions, an individual member of the public also suggested that a guaranteed service level payment should extend to any person who reports a faulty public light (rather than limit it only to a person residing in a neighbouring property of a faulty light). However, this would broaden the intent of the scheme.

On balance, our final decision is to maintain the current guaranteed service level scheme.

Other policy matters

Stakeholders raised other policy matters such as introducing a definition of complex faults for major roads. We consider it appropriate for electricity distribution businesses to engage directly on operational matters with the relevant parties such as local councils, the road authority, train and tram operators and other utility service providers to resolve the issue. We note these bodies may operate under their own regulatory frameworks.

Some stakeholders raised poor performance to repair faulty lights. Electricity distribution businesses will continue to have obligations to deliver public lighting services (as we are transferring the minimum service standards to the Electricity Distribution Code of Practice). These obligations are enforceable and we can consider actions for potential non-compliance, informed by our Compliance and Enforcement Policy and priorities.¹⁴

Other matters raised by stakeholders included making public lights energy efficient, minimising light pollution in context of astrophotography and to promote lighting designs that support Australian wildlife, many of which are nocturnal species. We noted but considered these matters to be outside the scope of this review.

¹³ VicRoads is now part of the Department of Transport and Planning.

¹⁴ [Compliance and Enforcement Policy | Essential Services Commission](#) and [Our compliance and enforcement priorities | Essential Services Commission](#)

Transferring relevant obligations to the Electricity Distribution Code of Practice

Our consultation paper proposed to transfer some obligations to the Electricity Distribution Code of Practice. Our final decision maintains this approach with the addition of two new obligations related to standard and non-standard fitting requirements as discussed in the previous section. We have also included some drafting and definition amendments as suggested by some stakeholders to help clarify the obligations being transferred.

In summary, the following public lighting obligations will be transferred to the Electricity Distribution Code of Practice:

- guaranteed service level payments for reporting public lighting faults
- public lighting minimum standards
- approvals for new standard and non-standard fittings
- information and reporting obligations
- definitions relating to public lighting obligations

Table 1 provides further detail of the obligations that will be transferred.

Stakeholders agreed with our proposal to retain key obligations. However, some stakeholders also proposed updating certain definitions and terms to be more up-to-date and relevant with current industry practices. We agree with most of these updates and made some amendments to incorporate the stakeholder feedback. We outline below some key updates we have included to the transferring obligations.

Updating replacement cycles for public lighting

In our consultation paper, we proposed to transfer the minimum service standard obligations to clause 19.7.1 of the Electricity Distribution Code of Practice. We also proposed further flexibility for stakeholders by removing the prescribed 4 or 8 years replacement cycle for public lighting assets. The Victorian Greenhouse Alliance supported this approach.¹⁵

Our final decision enables public lighting customers to negotiate the maintenance plan that best suits their needs. However, if there is no agreement, the minimum standard reverts back to the standards that we prescribe. We think this provides a flexible maintenance approach that can account for new public lighting technology. New lighting technologies benefit all customers through energy savings and cost efficiencies (such as fewer replacements due to increased life spans).

¹⁵ The Victorian Greenhouse Alliance submission directly used our draft Electricity Distribution Code of Practice code drafting to provide comments. Their comments to clause 19.7.1 are captured in Appendix A.

Updating definitions and terms for relevance

Stakeholders suggested updating certain definitions and terms, to be more up-to-date and relevant with current industry practices or technical standards. We have incorporated this feedback in our final decision. Some examples are as follows:

- **Lamps definition.** We have amended the definition of lamps to align with the relevant Australian Standard AS/NZS 1158.
- **Large customer definition.** We have amended the definition of a large customer to include public lighting customers. This allows the use of the existing clause 1.5 in the Electricity Distribution Code of Practice, which would enable public lighting customers (as large customers) to negotiate bespoke arrangements with electricity distribution businesses.
- **Major Roads definition.** We have amended the definition of 'major roads' for public lighting, by removing the reference to how the Melway street directory classifies roads. The new definition defines major roads as those designated by the Department of Transport and Planning.
- **Smart Lighting Central Management System (CMS).** We have introduced a new definition for this to recognise modern control systems adopted by public lighting customers and electricity distribution businesses, to monitor and maintain public lighting. We have introduced a new definition into the Electricity Distribution Code of Practice, as per the definition that is currently used in the National Electricity Rules.
- **Smart Control Nodes definition.** This is a new definition introduced to capture new electronic control equipment for public lighting. These modern systems have communication capabilities to interact with smart lighting central management systems (CMS), as noted above.

Appendix A provides further details on these and other updated terms. It also outlines other stakeholder feedback that we have decided not to progress with.

Administrative updates

Separate to this code review, we have taken this opportunity to undertake some administrative updates to the Electricity Distribution Code of Practice.

We have recently published our decision to revoke the Electricity Customer Metering Code of Practice and the Electricity Customer Transfer Code of Practice.¹⁶

¹⁶ ['Revoking the Electricity Customer Metering and Transfer Codes of Practice'](#), Essential Services Commission, 27 August 2025.

The revocation of these codes took effect on 12 September 2025. To assist with clarity and to reflect the revocation of these codes, we have deleted section 6 from the Electricity Distribution Code of Practice. We note metering being regulated under the National Electricity Rules.

Table 1 summarises the administrative updates to the Electricity Distribution Code of Practice.

Table 1: Obligations to be transferred from the Public Lighting Code to the Electricity Distribution Code of Practice

Obligation	Description	Public Lighting Code clauses	Proposed new clauses to be transferred to the Electricity Distribution Code of Practice
Guaranteed Service Levels	Electricity distributors are required to provide a payment to individuals who report faults in public lighting infrastructure. We will retain this obligation.	Clause 2.5, (a) and (b)	Clause 14.5.1A, (a) and (b)
Public lighting minimum standards	Electricity distributors must operate public lighting at a certain standard – this includes how often lamps are replaced, or the time required to repair or replace them. Because public lighting customers are often organisations (such as local councils), distributors must negotiate specific performance targets with them in good faith. We are retaining these obligations, with some minor amendments. This is to reflect stakeholder feedback and to account for innovations in technology, which have improved the longevity of lamps. Lamp technology also continues to improve, with metering and remote monitoring of lamps expected in the future. The final decision specific changes are: Removing references to the 4 and 8 years for lamp and photo-electric cells replacement cycle, introducing smart control nodes as well as requiring distributors to replace these ‘in accordance with industry best practice or as otherwise required by the public lighting standards.’	Clause 2.3.1, (a) – (g) Clause 2.3.2 Clause 2.2	Clause 19.7.1, (a) – (g) Clause 19.7.2

Obligation	Description	Public Lighting Code clauses	Proposed new clauses to be transferred to the Electricity Distribution Code of Practice
	- Amending references to patrolling major roads to inspect lights 'at least 3 times per year', to be: 'in accordance with industry best practice as agreed with the public lighting customer; or - when a central management system is established, a negotiated patrol frequency as agreed with the public lighting customer; or - at least 3 times per year where there is no agreement.'		
Approvals for new standard and non-standard fittings	These two obligations relate to the product approval process to streamline the introduction of new lighting products. They are categorised as: - Standard fittings: These are standard lighting products and devices a customer has introduced which a distributor has deemed to be comparable and acceptable to their standard to be used in the distribution system. - Non-standard fittings: These are custom or bespoke lighting products and devices a customer prefers but are not part of the standard fittings (products).	Clause 3.2 Clause 3.3	Clause 19.8 Clause 19.9
Use of distribution system to maintain public lighting asset supply connections	Transferring the use of the distribution system obligation ensures that electricity distributors maintain the supply connections to public lighting assets.	Clause 2.2	Clause 19.10
Information and reporting obligations	These obligations require distributors to provide information, data and reports to a public lighting customer.	Clause 5.1.1 Clause 5.2.1, (a) – (g)	Clause 25.3.4, (a) – (j) Clause 25.3.5 Clause 25.3.6

Obligation	Description	Public Lighting Code clauses	Proposed new clauses to be transferred to the Electricity Distribution Code of Practice
	This includes standard information such as: • quarterly and annual maintenance progress reports • quarterly performance reports. To assist with drafting clarity, we have separated out the consultation paper clause 25.3.4(j) and inserted it as a new sub clause 25.3.6.	Clauses 5.2.2, 5.3 and 5.4	
Definitions	Key definitions that support the public lighting obligations to be transferred into the Electricity Distribution Code of Practice.	Definition section	Definition section
Administrative updates	We have made some administrative updates to reflect the revocation of these metering instruments by deleting section 6 from the Electricity Distribution Code of Practice.	N/A	N/A
Electricity Customer Metering Code of Practice and Electricity Customer Transfer Code of Practice revocations	Section 6 related to metering matters which are regulated under the National Electricity Rules.		

Timing and next steps

The following outlines the schedule for the revocation and transfer of obligations for the respective instruments.

- The Public Lighting Code - revoked on 31 December 2025.
- The Electricity Distribution Code of Practice - retained obligations will take effect from 1 January 2026.

Attachment A sets out the final drafting amendments to the Electricity Distribution Code of Practice regarding the transferring obligations.

Further information regarding this review

Further information regarding this review is available on our [webpage](#).

If you have any questions, please contact us at: energyreform@esc.vic.gov.au

Glossary

Acronym	Meaning
AER	Australian Energy Regulator
EDCOP	Electricity Distribution Code of Practice
GSL	Guaranteed Service Level
NER	National Electricity Rules
PLCOP	Public Lighting Code of Practice

Appendix A

Stakeholder feedback considerations – Public Lighting Code Review

Below is a summary of the commission's consideration to stakeholder feedback with the Public Lighting Code Review – Consultation Paper. It has been prepared for the sole purpose of aiding this final decision.

Table 1 – Public Lighting Code Review – Stakeholder Feedback Considerations

Stakeholder	Feedback	Our consideration
Citipower, Powercor and United Energy (distributors)	Distribution System and public lighting assets definition The commission proposes to amend the EDCoP definition of 'distribution system' to explicitly include public lighting assets. This would achieve the intent of applying existing asset management requirements to public lighting. Such a definitional change has unintended effects by extending the term 'distribution system' across all EDCoP provisions. This includes areas not specifically designed for public lighting. We recommend that the Commission adopts an explicit reference to 'public lighting assets' to ensure the relevant clauses only apply where they are intended to do so (for example, clause 19.2.1 on asset management). This will prevent the unintended expansion of unrelated rights and obligations across the EDCoP.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. The definition of 'public lighting assets' is to be applicable to the assets that a licensed distributor has responsibility for under the 'distribution system' definition. We acknowledge there could be cases where licensed distributors and public lighting customers may require negotiation or have agreements to assist with demarcation clarity.

	Ability to vary obligations by agreement Under clause 1.4 of the PLC, distributors and public lighting customers may vary their rights and obligations by written agreement. In the EDCoP, this flexibility is narrower as it applies only where the customer meets the definition of a 'large customer' (≥ 500 kVA demand or ≥ 160 MWh annual consumption) and where the variation does not reduce rights, or increase obligations, without providing equal value benefits. We recommend the Commission considers retention of a mechanism that allows negotiated variations with all public lighting customers, not only 'large customers' to maintain flexibility and support efficient management of service arrangements.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. We have amended the 'large customer' definition by inserting a new category (b) public lighting customer.
	Billing and service Information clarity The proposed new clause 25.3.4(k) of the EDCoP requires distributors to provide billing information that enables public lighting customers to verify the amounts charged. We suggest the Commission clarify how this obligation is intended to operate in situations where customers are billed indirectly through retailers. Clear and targeted drafting will help avoid confusion and ensure that the information provided remains meaningful and proportionate to customer needs.	New clause 25.3.4(k) in the Electricity Distribution Code of Practice is the direct transferral of the current clause 5.3 in the Public Lighting Code. Distributors have obligation to provide this information to the public lighting customer under the current Public Lighting Code where retailers process the billing information. Distributors are expected to continue and maintain an equivalent service through this transferring obligation.

	Information and data In relation to reporting and data provision under proposed clause 25.3.4, the requirement to agree data formats with each public lighting customer could create unnecessary administrative burden. We suggest allowing the use of standard formats such as CSV or DXF by default with alternatives available by agreement.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. Clause 25.3.4(a) now specifies the same default data standard as currently provisioned in the Public Lighting Code.
	Wholesale market We recommend retaining the reference to the wholesale electricity market in clause 25.3.4(j). This is so customers who wish to source electricity directly from the wholesale market can do so.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. We have separated out clause 25.3.4(j) into a new clause 25.3.6. It now incorporates this drafting so public lighting customers are informed on their rights and required information to be able to engage with the wholesale market.
	Separation of clause 25.3.4(l) Finally, the opening wording of clause 25.3.4 should be tightened to make clear it applies to distributor owned public lighting assets, and some requirements such as the reporting of charges in paragraph (l) would be clearer and easier to implement if expressed as separate standalone clauses.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. We have separated out 25.3.4(l) into a new clause 25.3.5 in the Electricity Distribution Code of Practice.

	Standard and non-standard fitting Recommend retaining the relevant obligations (clauses 3.2 and 3.3 from the Public Lighting Code of Practice)	We agree with the feedback and have transferred these two obligations into the Electricity Distribution Code of Practice. We have expanded further on the reasoning for these obligations in our final decision paper.
	Distributor billing Clause 6 provides a consistent default billing arrangement where no retailer is involved and acts as a clear reference point for resolving disputes. While these scenarios are now relatively uncommon, keeping this clause ensures there remains a reliable framework should such situations arise.	Our final decision is to revoke this obligation. We note that no electricity distribution business currently holds a retail licence under the Electricity Industry Act to perform this activity (and a contravention of the Act to do so without a licence). We have expanded further on the reasoning for this in our final decision paper.
	Outdated Public lighting customer definitions: • VicRoads; and • the Docklands authority.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting to update the public lighting customer definition to: • replace 'VicRoads' with the 'Department of Transport and Planning'; and • remove the 'Dockland Authority' reference¹⁷

¹⁷ In accordance with the Order in Council GG2007S282.

	Guaranteed Service Level (GSL) repair condition. Amend the public lighting repairing condition from 2 business days to 10 business days.	We consider our policy position to retain 2 business days is appropriate. We also note submissions by individual members of the public raising poor repair response issues by some distributors. Maintaining this obligation helps to highlight to distributors of their responsibilities to delivering appropriate public lighting services.
Jemena (distributor)	Minimum 3 times annual patrols. We do not consider the nightly patrol 'at least 3 times per year' is necessary. More and more smart cell lights are being installed, and councils strongly support the accelerated LED rollout. Smart cell lights can be monitored remotely on an ongoing basis, which is what Jemena is already doing.	We acknowledge the public lighting space transitioning to adopt and benefiting from smart lighting technologies in the future. However, while new lighting technology helps over time, many existing lights cannot be remotely monitored nor the pace of the technology adoption to be uniform by all public lighting customers. The transferring obligation would enable distributors and public lighting customers to negotiate these monitoring periods where smart technologies becomes available but defaulting to 3 patrols per year if there is no remote monitoring or agreement.
	Guaranteed Service Level (GSL) repair condition.	Similar to our consideration with Citipower, Powercor and United Energy's submission, we consider our policy position to retain 2 business days is appropriate.

	Amend the public lighting repairing condition from 2 business days to 7 business days (to match the minimum service standard requirements).	We note submissions by individual members of the public raising poor repair response by some distributors. Maintaining this obligation helps to highlight to distributors of their responsibilities to delivering appropriate public lighting services. Additionally, we highlight that the public lighting Guaranteed Service Level (GSL) scheme and the minimum service standard are different obligations: • A GSL payment must be made to a residential / small business customer who first reports a fault (neighbouring to their premise) that has not been repaired within 2 business days (of identifying it). • The minimum service standard reflects performance measures to require distributors to repair faults within 7 business days with a public lighting customer (local Councils and the Department of Transport and Planning - VicRoads).
Victorian Greenhouse Alliance	Fault report definition <i>(a) distributor's 24 hour call centre or digital reporting system receives a report of a fault (from any source).</i>	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice. The definition of 'fault report' has been amended to include the term 'electronic communication' reporting system.

(an alliance of 70 local councils)	Introduce a new definition of SLCMS Recommend also a definition of Smart Lighting Central Management System (SLCMS) as we refer to it several time throughout the comments.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. A new definition 'Central Management System' (CMS) has been inserted in the definition section in the Electricity Distribution Code of Practice. This new definition aligns with the National Electricity Rules.
	Lamp definition Recommend aligning with definitions in AS 1158.0 i.e.: The generic term for the light source in a luminaire.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. The definition of 'Lamp' now aligns with the Australian Standard AS1158.
	Major Roads definition Recommend redefining this as per DtP (i.e. remove Melway reference). major road means a road designated by the Victorian Department of Transport as 'M', 'A' or 'B'.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. We have removed the Melway reference in this definition. Major Roads are now those designated by the Victorian Department of Transport and Planning as 'M', 'A' or 'B'.
	Non-major road lamps definition Recommend changing this to:	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. We note the Public Lighting Code applies to licensed distributors. Therefore, the definition of non-major road

	<i>non-major road luminaire</i> means a <i>luminaire</i> installed other than on <i>major road</i> and includes <i>luminaires</i> installed in off street locations by DNSPs including car parks, pathways and parks.	luminaire in the Electricity Distribution Code of Practice focus the definition to apply to licenced distributors.
	Non-standard fitting definition An approved non-standard fitting is a luminaire, pole, bracket or attachment that has been approved by a distributor use in a VESI public lighting scheme but is not an approved standard fitting. Approved non-standard fittings may also often be referred to as decorative fittings and are primarily used within underground estates or within retail areas to enhance the beautification of the local environment.	We have considered this feedback but have retained the current definition drafting to maintain clarity rather than adopting the suggested feedback.
	Standard fitting definition Replace the term ‘fitting’ throughout to ‘luminaire’ and to mean: Standard products Distributors maintain replacement stock of a number of public lighting products including lamps, photo-electric cells, luminaires, brackets, public lighting poles, supply cable and control equipment. These assets, which are primarily used in large scale across distribution networks are classified as approved standard product	We have considered this feedback but have retained the current definition drafting to maintain clarity rather than adopting the feedback suggestion.

	Fault reporting channel Electricity Distribution Code of Practice Clause 19.7.1 (a): - operate a 24 hour call centre and/or online platform to receive public and public lighting customer fault report; and	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. Clause 19.7.1(a) has been amended to include the term 'electronic communication' system.
	Minimum standard - Non-major road lamp replacement Electricity Distribution Code of Practice Clause 19.7.1 (c) - replace non-major road lamps at least every 4 years or otherwise in accordance with industry best practice or as required by the public lighting standards;	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. Clause 19.7.1(c) has deleted the drafting of 'non-major roads' and the 'at least every 4 years or otherwise'.
	Minimum standard – Photo-electric cell and smart control nodes replacement Electricity Distribution Code of Practice Clause 19.7.1 (e) - replace photo-electric cells and smart control nodes at least every 8 years or otherwise in accordance with industry best practice or as required by the public lighting standards;	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. Clause 19.7.1(e) has been amended and: • introduced and inserted here a new 'smart control node' definition. • deleted the drafting 'at least every 8 years or otherwise'
	Minimum standard – 3 times annual patrols Electricity Distribution Code of Practice Clause 19.7.1 (f) - routinely patrol major roads at night to inspect, replace or repair luminaires in accordance with industry best practice	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting.

	as agreed to with the public lighting customer or at least 3 times per year; OR when a SLCMS is established for major road luminaires that provides asset fault information across the DNSP region or within a defined geographic region (such as a local government area).	To assist with drafting clarity and to insert the new 'Central Management System' definition, we have split clause 19.7.1(f) into three new sub-categories as follows: 19.7.1(f) routinely patrol major roads at night to inspect, replace or repair luminaires in accordance with: (i) industry best practice as agreed with the public lighting customer; or (ii) when a central management system is established to serve a geographic region in agreement with the public lighting customer for major roads luminaires; or (iii) at least 3 times per year.
	Minimum standard – lamp useful life Electricity Distribution Code of Practice Clause 19.7.1 (g) - Replace with 'useful', i.e. DNSPs do not routinely replace assets at end of economic life.	We have considered and incorporated this feedback in our final Electricity Distribution Code of Practice drafting. Clause 19.7.1(g) has been amended to replace the term 'economic' with 'useful'.
	Standard and non-standard fitting Recommend retaining the relevant obligations (clauses 3.2 and 3.3 from the Public Lighting Code of Practice)	We agree with the feedback and have transferred these two obligations into the Electricity Distribution Code of Practice. We have expanded further on the reasoning for these obligations in our final decision paper.

Gannawarra Shire Council	Distributor data Distributor data provision and reporting requirements (asset lists, spatial data, lamp/pole type, installation/replacement history).	We have considered this feedback but consider the following obligations sufficiently cover to continue the suggested requirements under the Electricity Distribution Code of Practice. We note: • clause 19.2.1(a),(b) – Asset management obligation • clause 25.3.4 – Information obligation. Clause 19.2.1(a)(b) obligates distributors to manage their assets. This includes managing their asset registry, locations, and maintenance plans. Clause 25.3.4 obligates distributors to provide public lighting asset data and information to the public lighting customer.
	Minimum service standards Minimum operational and fault response standards, including guaranteed service levels.	We highlight the new clause 19.7 transferred to the Electricity Distribution Code of Practice is the equivalent obligation to continue these requirements.
	Standard and non-standard fittings Clear processes for standard and non-standard fittings, with approval timelines and cost responsibilities	We agree with the feedback and have transferred these two obligations into the Electricity Distribution Code of Practice. We have expanded further on the reasoning for these obligations in our final decision paper.

		Separately, distributor service costs are administered under the national economic framework regulated by the Australian Energy Regulator.
	Design notice Design and notice requirements for new lighting or alterations, ensuring alignment with AS/NZS 1158 and local planning requirements	We consider the connection framework under the National Electricity (Victoria) Act 2005, Schedule 2, captures the intent of this requirement to not require the transferral of this obligation. Under the adopted national framework, Part C, clause 5A.C.3(a)(3) is noted as follows: ▪ The Distribution Network Service Provider might, according to the circumstances of a particular case, need to provide further information to ensure the connection applicant is properly informed – for example, information about: ○ technical and safety requirements; ○ the types of connection that are technically feasible; ○ network capacity at the proposed connection point; ○ possible strategies to reduce the cost of the connection. The ‘technical requirements’ under this part of the framework refers to the distributor’s relevant technical standards such as AS/NZS 1158 related to public lighting.

	Billing transparency Billing transparency and published charge schedules to support long-term financial planning.	The schedule of public lighting service charges are regulated under the national framework and administered by the Australian Energy Regulator. Separately, our final decision is to revoke the billing obligation by electricity distribution businesses because no distribution business currently holds a retail licence under the Electricity Industry Act to perform this activity (and a contravention of the Act to do so without a licence). We have expanded further on the reasoning for this in our final decision paper.
	Dispute resolution Dispute resolution pathways, including escalation to EWOV.	We highlight the current clause 18.2 in Electricity Distribution Code of Practice is the equivalent to the dispute resolution framework under clause 7 of the Public Lighting Code of Practice.
Individual 1 submission	Major Roads Oversight/Patrol issues Have extensive experience in this domain and has been engaging with distributors and the commission for more than 10 years.	We note the Victorian Greenhouse Alliance¹⁸ submission supporting our approach. Their feedback indicated enabling flexibility rather than expanding this policy from expected

¹⁸ An alliance committee that represents 70 local Government Councils

	Has observed considerable gaps by distributors to conduct prescribed routine patrols to identify faulty public lights on major roads. As a result, the individual has observed significant issues by distributors to repair faulty lights in the timely manner.	diminishing road patrols through smart lighting / monitoring technology uptake. We consider as relevant to understand how these new technologies may interact and affect this obligation. Therefore, we consider it is too early to consider and introduce new policies at this stage.
	Definition of a Complex Fault No definition of a complex fault enables distributors not to fix faulty lights in a timely manner.	Complex faults may involve operational interactions with stakeholders such as VicRoads, Councils, train/tram operators and other utility services who may have their own regulatory framework to operate with that expands beyond electricity regulations. We consider it is more appropriate for the parties directly involved operationally are best placed to manage such issues. This could be through processes, protocols or where relevant, agreements between parties rather than formal regulations.
	Guaranteed Service Level (GSL) condition Requirement to be at an adjacent property for compensation payment.	Distributors are proposing bulk replacement of their lighting fleet. We consider there are limited benefits to changing the GSL framework right now, as the bulk replacement program will need time to work through the system.

	No new policy considerations Why no new policies are being considered.	We note the introduction of broader new national rules such as the CER flexible trading to enable the energy transition. This rule is expected to enable smart technologies for public lighting (and is being considered for Victoria). However, until the broader effects of this rule and policies can be appreciated, we consider it is too early to consider new policies at this stage.
Individual 2 submission	Poor repair response by distributors even with the GSL framework. Sometime complex ownership models with no clear way to identify who is responsible for the asset. Suggested to retain: • Clause 2.1 – Good asset management • Clause 5.1.2 – Asset data, ownership and demarcation.	We are retaining and transferring some obligations to the Electricity Distribution Code of Practice that electricity distribution businesses will be held accountable for. We highlight: • Clause 19.2.1 - Asset management • clause 19.7.1 - Minimum service standards • clause 25.3.4 – Information provisions and asset data These clauses support to ensure that electricity distribution businesses and public lighting customers such as councils will be able to keep track of their respective assets. These obligations are enforceable. We can consider actions for potential non-compliance, informed by our Compliance and Enforcement Policy and priorities.

Individual 3 submission	Public lighting should consider environmental factors such as: • Light pollution and its impact to astrophotography. • Promoting lights designs which support Australian wildlife and biodiversity (many of which are nocturnal species). • Integrate energy efficiency and smart lighting technologies.	We note many of these matters may have complex environmental and technical interactions or may sit outside our regulatory framework. However, we note that the National Energy Objective was recently amended to include emissions reduction as one of its objectives. Therefore, distributors will need to consider how their assets such as public lighting will support these objectives. We note for example distributors proposing bulk adopting LED lighting technology which can support the emissions reduction objective through energy efficiencies.
Individual 4 submission	Poor repair response by their local distributor. Complex ownership model hampering action and who is responsible. Distributors only repair when reported by the public. This is too onerous and complex process to report faulty lights.	We note some electricity distributions businesses and public lighting customers are considering smart lighting technology to remotely monitor lights and faults. However, these will take time. Until their implementation, the current method of public reporting of faulty lights is expected to continue.
Individual 5 submission	Modernise standards to include smart lighting technologies.	Our standards focus on minimum standards related to operational performance (e.g. repair response). However, we note distributors have been and are further proposing bulk LED replacement programs as well as

		considering implementing more sophisticated control / monitoring technologies (from broader energy rule changes beyond our regulations).
Individual 6 submission	This submission did not provide relevant comment.	