

26 September 2025

Mr [REDACTED]
Executive Director, Energy Division
Essential Services Commission
Melbourne, VIC, 3000

Lodged via email: [REDACTED]

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Dear [REDACTED]

Public Lighting Code of Practice Review 2025 – 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 Public Lighting Code (the Code).

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 We recognise the value in repealing outdated instruments and obligations to reduce risks of duplication, conflict between rules and other unintended consequences.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.

We are supportive of the ESC's proposal to revoke the Code in full and to transfer some of the obligations in the Electricity Distribution Code of Practice (EDCoP). This is also a timely opportunity to update the EDCoP to reflect recent developments associated with the Australian Energy Market Operator's (AEMO) Flexible Trading Arrangement (FTA). Notwithstanding our support for the changes, we have identified a couple of changes that we request the ESC consider before finalising its review.

The ESC proposed:

- *to move clause 2.31(f) of the Code to EDCoP and to amend it to read: 'Routinely patrol major roads at night to inspect, replace or repair luminaires in accordance with industry best practice as agreed to with the public lighting customer or at least 3 times per year'.*

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.

- *to move clause 2.3.1 (b) (Minimum standards) of the Code and clause 2.5 (Guaranteed Service Level) of the Code to the EDCoP without change.*

*2.3.1 (b) repair or replace **standard fittings** within 7 **business days** of a **fault report** and use best endeavours to repair or replace **non-standard fittings** within 7 **business days** of a **fault report** subject to the availability of fittings;*

2.5 Guaranteed Service Level

Where a distributor does not repair a public light within 2 business days of a fault report or a period otherwise agreed between the distributor and the person, it must pay the first person who reported the fault a minimum of \$25 if:

Clauses 2.3.1(b) and 2.5 should be consistent. We consider it more practical and achievable to align the minimum requirements for GSL purposes with the 7-day period prescribed under clause 2.3.1(b).

We consider that, as far as the **existing obligations** are concerned, the proposed revocation of the Code will not materially impact our costs and, therefore, our customers. 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.

If you have any questions regarding this letter, please feel free to contact me via

[REDACTED] .

Kind regards,



[REDACTED]
Electricity Regulation Manager
Jemena Electricity Networks