

Revoking the Electricity Customer Transfer Code of Practice and the Electricity Customer Metering Code of Practice

Final Decision

12 August 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 Electricity Customer Metering Code of Practice and the Electricity Customer Transfer Code of Practice.

The revocation of these codes will take effect on 12 September 2025.

This paper details our decision to revoke the [Electricity Customer Transfer Code of Practice](#) (Transfer Code) and the [Electricity Customer Metering Code of Practice](#) (Metering Code), referred together as ‘the codes’.

Earlier revocation

As per section 76(3) of the *Essential Services Commission Act 2001*, these codes were to be revoked on 31 December 2025. However, we have decided to revoke them earlier. This follows a review of the codes which considered whether any provisions remained relevant and needed to be retained.

Other instruments covering customer transfers and metering

We consider that obligations in the codes related to electricity customer transfers and electricity customer metering are sufficiently provided for in the following instruments:

- National Electricity Rules (NER)
- Market Settlements and Transfer Solutions (MSATS) Procedures Principles and Obligations
- Metrology Procedures¹
- Electricity Distribution Code of Practice
- Energy Retail Code of Practice
- Orders in Council.

Our decision to revoke both codes in their entirety will remove unnecessary duplication and outdated rules imposed by the codes. We note that the Energy Retail Code of Practice and the Electricity Distribution Code of Practice contain minor references to the codes (see Appendix A), which will be removed in due course.

¹ ‘Metrology Procedure’ means the national Metrology Procedure published by AEMO in accordance with the requirements of the NER – see clause 9 of the Metering Code.

Who we consulted

On 7 April 2025, we distributed a consultation paper for targeted consultation. We invited stakeholders who are regulated or impacted by the codes to provide written feedback. The paper detailed our proposal to revoke the codes. It also highlighted key code provisions for stakeholder feedback and sought views on whether there were compelling reasons for us to include any provisions in our other codes.

Our targeted consultation sought feedback from key stakeholders including electricity distribution businesses, consumer and community groups, electricity retailers, embedded network operators, Victorian Government departments and agencies, the Australian Energy Market Operator (AEMO), the Energy and Water Ombudsman Victoria (EWOV) and other regulators.

The Australian Energy Market Operator

We consulted AEMO to understand how revoking the codes would impact their procedures and what timeframes would be needed to implement any consequential changes. AEMO administers electricity customer transfers and metering through the NER, MSATS and Metrology Procedures. We note that AEMO's MSATS procedures include a process that is unique to Victoria because of the Transfer Code. Revoking the Transfer Code will remove the need for this Victorian-specific process, and AEMO can then remove this from its MSATS procedures.

Electricity businesses and consumer groups

We consulted electricity distribution and retail businesses to understand if revoking the codes would impact their operations and procedures. We also consulted Victorian consumer and community groups to understand how consumers may be impacted by the proposed revocation of the codes. We sought the perspectives of these groups regarding the removal of Victoria's customer transfer debt objection under the Transfer Code to ensure that the revocation of this clause would not negatively impact customers experiencing payment difficulties.

Submissions

We received nine written submissions:

- Australian Energy Council (AEC)
- AEMO
- AGL
- AusNet
- CitiPower, Powercor & United Energy
- Energy On

- Engie
- Jemena
- Origin.

All submissions expressed support for revoking the codes. Stakeholders indicated that this action would help align customer transfer and metering rules with national regulations and eliminate redundant requirements.

Stakeholders did not anticipate the revocation having any negative impacts on industry or the community.

See the submissions on our [website](#).

The following sections set out our reasons for revoking the codes.

Revoking the Electricity Customer Metering Code of Practice

We are revoking the Electricity Customer Metering Code of Practice with effect from 12 September 2025.

Background

The Metering Code was published in 2001 by the Office of the Regulator General and predates Victoria's 2005 adoption of the NER. The Metering Code was deemed a code of practice on 1 December 2021.²

The Metering Code regulates customer metering to the extent not regulated by the NER or Metrology Procedures.

The code applies to:

- electricity distributors
- electricity retailers
- persons who take supply from an embedded network
- responsible persons³
- metering providers
- customers and embedded generators who are obliged to comply with this code under a distribution contract.⁴

Since its publication in 2001, the commission has made a variety of minor changes to the Metering Code. These changes implemented the decisions of other reviews or reflected developments to the sector, such as the rollout of interval meters. Until now, the Metering Code has never been substantially reviewed.

² As per section 76 (3) of the *Essential Services Commission Act 2001*.

³ As per the Metering Code: 'A "responsible person" means in relation to second tier customers, the person who has the responsibility for a metering installation for a particular connection point, being either the distributor or the "market participant" as described in chapter 7 of the NER.'

⁴ See clause 1.3 of the Electricity Customer Metering Code of Practice.

Why we are revoking the Metering Code

- The Metering Code is no longer fit for purpose.
- The code duplicates obligations already provided for in other instruments, adding unnecessary regulatory complexity.
- Some provisions in the code are out of date or redundant.

Many obligations in the Metering Code are superseded by Victorian regulations and the broader national regulatory framework that governs electricity metering.

As the national electricity market has matured, areas regulated by the Metering Code became covered by the national regulatory framework. The National Electricity Rules now encompass a wide range of metering-related functions, including the installation of meters, data collection and the responsibilities of various market participants in the National Electricity Market (NEM). However, Victoria maintains some jurisdictional derogations to Ch 7 of the NER to accommodate metering infrastructure. This includes Victoria's Advanced Metering Infrastructure (AMI) Orders which detail metering derogations that overlap with clauses in the Metering Code.⁵

This regulatory shift has meant that the Metering Code and national rules regulate the same activities. For example, both frameworks specify how quickly a meter must be installed, how data should be handled and who is responsible for maintaining metering equipment.⁶ The overlap of Victorian and national regulations has meant that retailers and distribution businesses operating in Victoria must adhere to both resulting in unnecessary regulatory complexity.

Regulatory and technological changes in the wider sector have seen some clauses in the codes become outdated or irrelevant. Rules concerning metering have also recently undergone further changes. These rule changes have largely been led by rule change processes managed by the AEMC. This includes 2024 amendments to the NER for [accelerating smart meter deployment](#) and [unlocking CER benefits from flexible trading](#) or the [open proposal](#) to give consumers access to their real-time energy data.

These regulatory changes may further outdate the Metering Code or require extensive reform by the commission. The commission has a minor role in this space, particularly where there are

⁵ [Victorian jurisdictional derogation, advanced metering infrastructure | AEMC](#), Australian Energy Market Commission, accessed 28 May 2025.

⁶ See clauses 6.1, 7.1 and 2.1 of the Electricity Customer Metering Code of Practice and Chapter 7 of the National Electricity Rules (NER).

Victorian-specific arrangements or protections. To remove undue regulatory complexity and burden, we consider it is necessary to revoke the Metering Code.

The commission will make minor amendments to other codes, such as the Energy Retail Code of Practice and the Electricity Distribution Code of Practice, to remove references to the Metering Code in due course.

The ownership of metering equipment

Origin raised a concern with the proposed revocation of the Metering Code relating to clause 2.2 which addresses the ownership of metering equipment and its relevance to embedded networks.⁷ Clause 2.2 sets out that metering equipment left on a customer's premises does not become the property of that customer. Origin is concerned that the Energy Retail Code of Practice does not explicitly state that metering equipment is not the property of the customer, even though it prohibits them from tampering with metering equipment.⁸

Our view is that clause 2.2 of the Metering Code is sufficiently accounted for in Victoria's deemed distribution contracts. Meters are owned and installed by Victoria's five electricity distributors. The deemed distribution contracts of Victorian electricity distributors address the issue of ownership of metering equipment. Under those contracts, none of the equipment and assets the distributor installs at the customer's premises, whether fixed to the land or any buildings, become part of the land or premises and may be removed after disconnection of electricity supply at the premises.⁹

In addition to clause 2.2. of the Metering Code and Victoria's deemed distribution contracts, AMI Orders also regulate metering.¹⁰ The [2009 AMI Order](#) outlines that for embedded networks with an annual electricity consumption of 160 MWh or less, the distribution business is responsible for providing and maintaining the parent meter.¹¹ In these cases, the cost of installing or upgrading the parent meter is included in regulated distribution charges, which are overseen by the Australian Energy Regulator (AER). Therefore, the parent meter is typically owned by the distribution business.

⁷ Origin Energy, *submission to the Essential Services Commission 'Revoking the Electricity Customer Transfer Code of Practice and the Electricity Customer Metering Code of Practice: Consultation Paper'*, 12 May 2025.

⁸ See clause 16.1(e) of the model terms and conditions in Schedule 2 of the Energy Retail Code of Practice.

⁹ See clause 6.7 of [AusNet's](#) deemed distribution contract, CitiPower, [Powercor](#) and [United Energy's](#) deemed distribution contract, and [Jemena's](#) deemed distribution contract.

¹⁰ [Victorian jurisdictional derogation, advanced metering infrastructure | AEMC](#), Australian Energy Market Commission, accessed 28 May 2025.

¹¹ See Part A, Clause 2(g) of *Victorian Government Gazette* No S 314, 25 November 2008.

For embedded networks that consume more than 160 MWh per year, the responsibility and cost of the parent meter is determined by private commercial agreements. In these cases, the parent meter is usually owned or arranged by the site owner or embedded network operator.

Embedded networks

Child meters, which serve individual customers within an embedded network, are generally owned and managed by the embedded network operator or exempt seller – such as a building manager or private energy provider. These meters are not part of the regulated metering framework and are instead governed by the [General Exemption Order 2022](#) (GEO). Under the GEO 2022, exempt retailers must obtain explicit informed consent from customers before selling them electricity.¹² They are also required to provide clear information about electricity tariffs, fees and any other applicable charges before obtaining consent.

The ownership of metering equipment is adequately provided for in Victoria's deemed distribution contracts. We do not consider that the ownership of third parties metering equipment is best considered in a code of practice. Therefore, we will not be including clause 2.2 in our other codes of practice.

¹² See Section 9, *Victoria Government Gazette*, General Exemption Order 2022, G 39, 29 September 2022.

Revoking the Electricity Customer Transfer Code of Practice

We are revoking the Electricity Customer Transfer Code of Practice with effect from 12 September 2025.

Background

The Transfer Code was published in 2001 by the Office of the Regulator General and predates Victoria's 2005 adoption of the NER. The Transfer Code was deemed a code of practice on 1 December 2021.¹³

The Transfer Code covers aspects of the electricity customer transfer processes. It operates in conjunction with the NER, AEMO's MSATS Principles and Procedures for all Connection Points, the Electricity Distribution Code of Practice and the Energy Retail Code of Practice.

The Transfer Code applies to:

- electricity distributors
- electricity retailers
- metering providers
- metering data providers who are obliged to comply with the code
- other responsible persons defined in the Transfer Code.¹⁴

Since its publication in 2001, the commission has made a variety of minor changes to the Metering Code. These changes implemented the decisions of other reviews or reflected developments to the sector. The Transfer Code was comprehensively reviewed in 2008 against changes to the *Essential Services Commission Act 2001* and relevant industry legislation. This resulted in the revocation of several code provisions. The Transfer Code has not been comprehensively reviewed since 2008.

¹³ As per section 76 (3) of the *Essential Services Commission Act 2001*.

¹⁴ See Section 1.3 of the Electricity Customer Transfer Code of Practice.

Why we are revoking the Transfer Code

- The Transfer Code is no longer fit for purpose.
- The code duplicates obligations already provided for by other instruments.
- Some provisions in the code are out of date or redundant.

The duplication of obligations in the Transfer Code originates from the evolution of energy regulation in Victoria and the broader NEM. Victoria initially developed its own regulatory instruments to manage the processes by which electricity customers could switch from one retailer to another. These instruments, including the Transfer Code, were designed to ensure transparency, fairness and efficiency in customer transfers within Victoria's electricity market.

Over time, the regulatory environment has shifted with the establishment of the Australian Energy Market Agreement and national energy regulatory framework.¹⁵ This framework is governed by the National Electricity Law and the NER. These national instruments cover many of the same areas that were previously regulated at a state level, including customer transfers. As a result, the processes and obligations set out in the Transfer Code began to overlap with those provided for in the national framework.

Such overlap has meant that electricity retailers and distribution businesses operating in Victoria must comply with both the state-based Transfer Code and the national rules. While the intent behind both sets of regulations are aligned – ensuring smooth and fair customer transfers – the duplication creates unnecessary complexity. This can lead to confusion about which rules take precedence, increase the compliance burden on industry and potentially result in inefficiencies in service delivery. To remove undue regulatory complexity and burden for businesses who must comply with both the state-based Transfer Code and the national rules, we are revoking the Transfer Code.

The commission will make minor amendments to the Energy Retail Code of Practice to remove any references to the Transfer Code in due course.

Victoria's customer transfer debt objection

The Transfer Code includes a provision for a retailer to object to the transfer of their customer based on having a 'certified debt'.¹⁶ If a customer has 'certified debt' (an amount over \$200 as

¹⁵ '[National energy governance | AEMC](#)', Australian Energy Market Commission, accessed 27 May 2025.

¹⁶ See clause 5.1(b) of the Electricity Customer Transfer Code.

defined in the Transfer Code), a customer's existing electricity retailer can object to the transfer of the customer to another retailer.¹⁷ To accommodate this obligation, the latest version of AEMO's MSATS Principles and Obligations allow electricity retailers to reverse a customer transfer based on certified debt.¹⁸

Objecting to a customer retailer change based on existing debt is unique to Victoria. To accommodate the 'certified debt' reversal under the Transfer Code, AEMO introduced a new change reason code (1061) specifically for Victoria.¹⁹ In Victoria, the losing retailer is provided one business day to assess certified debt and reverse the transfer if certified debt is present.²⁰ If certified debt is not recognised within one business day, a retailer can use alternative agreements with the new retailer to reverse a customer's transfer.²¹

AEMO administers the transfer objection code for certified debt in Victoria. In their submission, AEMO informed the commission that the revocation of clause 5.1(b) of the Transfer Code will require AEMO to implement corresponding changes to remove the debt objection code from their processes and systems. Removing the debt objection code will also align Victoria's procedures with other jurisdictions.

Maintaining consumer protections

The transfer debt provision could be viewed as a consumer protection: preventing a customer from accumulating debt with multiple retailers. It can also be restrictive: preventing a customer from exercising their choice.

We heard feedback from consumer groups that, in practice, most retailers do not object to the transfer of customers in certified debt. Our analysis of data also confirms that retailers rarely object a customer transfer due to certified debt (only 0.3 per cent of customer transfers were objected due to debt, on average per month in 2019).²² Rather, consumer groups noted that some retailers occasionally provide incentives, such as debt waivers, if a customer in debt transfers to another retailer.

¹⁷ See Clause 6 of the Electricity Customer Transfer Code (certified debt is defined as an aggregate sum of \$200 or more [...] owing by a [customer] to a retailer in respect of a NMI [...]).

¹⁸ See Section 7.1.3 of MSATS Principles and Obligations.

¹⁹ See AEMO, [NEM Customer Switching Draft Report and Determination](#), December 2019, p. 14; See also [AMEO Customer Switching Q and A session](#), 2020, p.17.

²⁰ Ibid.

²¹ See AEMO, [NEM Customer Switching Draft Report and Determination](#), December 2019, p. 14.

²² See AEMO Section 4.3.1, [NEM Customer Switching Draft Report and Determination](#), December 2019, p.13.

Consumer groups considered that retailers can do more to support customers experiencing vulnerability or payment difficulty.²³ However, they agree that preventing customers from transferring to another retailer with potentially cheaper plans is not helpful.

Customers are covered by a range of robust consumer protections under the Payment Difficulty Framework and family violence protections in the Energy Retail Code of Practice. The Payment Difficulty Framework mandates that retailers provide standard and tailored assistance to customers who may be anticipating or experiencing payment difficulty. This ensures that disconnection is a measure of last resort.²⁴

Family violence protections

Family violence protections require retailers to provide safe, supportive and flexible assistance to customers affected by family violence.²⁵ Retailers must also safeguard affected family violence customers confidential information, consider the potential impact of debt recovery actions and determine the person responsible for the energy consumption in question.²⁶

We heard from consumer groups that customers affected by family violence often need to transfer energy accounts and retailers. In these cases, consumer groups agree that allowing a retailer to object to a customer transferring to another retailer could be detrimental to affected customers.

Our Payment Difficulty Framework and family violence protections significantly reduce the risks of harm associated with customer debt and provide more effective options for debt management than blocking customer transfers. We consider that the continued use of the certified debt objection is unnecessary and superseded by consumer protections under the Energy Retail Code of Practice.

Our decision to remove this provision with the revocation of the Transfer Code will also remove regulatory complexity by aligning Victoria's customer transfer process with the practices of the other jurisdictions.

²³ Financial Counselling Victoria and Financial Counselling Australia, *Rank the Energy Retailer 2025 Report*, 2025, p. 7.

²⁴ See Clause 121 (1) of the Energy Retail Code of Practice.

²⁵ Clause 146 of the Energy Retail Code of Practice.

²⁶ See clauses 150 and 152 of the Energy Retail Code of Practice.

Timings and next steps

The Electricity Customer Metering Code of Practice and the Electricity Customer Transfer Code of Practice will be revoked on 12 September 2025, 30 days after the publication of this final decision.

This responds to industry feedback and will provide AEMO and market participants 30 days to make any system or procedural adjustments necessary.

Origin noted in its submission that the removal of the certified debt objection will require a transition period to allow time for industry systems and processes to be appropriately updated.²⁷ This will include an amendment to its MSATS procedures to remove the transfer objection code for certified debt.²⁸ AGL's submission also suggested that a notice period of 30 days would be necessary to give AEMO and market participants enough time to adjust their systems.²⁹

The commission has worked closely with AEMO to ensure a smooth and aligned transition between the revocation of the Transfer Code and changes to AEMO's procedure. We understand AEMO intends to deactivate the MSATS change request used to facilitate debt reversals in Victoria, as outlined in the MSATS Procedure.

We have provided for 30 days to allow AEMO time to implement these changes and inform industry market participants. AEMO also plan to undertake a subsequent consultation on the MSATS Procedure to allow them to amend the wording of their processes to reflect the change.

²⁷ Origin Energy, *submission to the Essential Services Commission 'Revoking the Electricity Customer Transfer Code of Practice and the Electricity Customer Metering Code of Practice: Consultation Paper'*, 12 May 2025.

²⁸ Ibid.

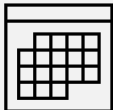


²⁹ AGL, *submission to the Essential Services Commission 'Revoking the Electricity Customer Transfer Code of Practice and the Electricity Customer Metering Code of Practice: Consultation Paper'*, 8 May 2025.

Appendix A – Engagement summary

Our targeted consultation period was open from 7 April to 8 May 2025. We consulted directly with a range of key stakeholders who may be most affected by the codes’ revocation.

The stakeholders we consulted include electricity retailers, electricity distribution businesses, government stakeholders, the AEC, AEMO, and consumer and community groups. Our consultation paper and its two appendices were sent via email, and submissions were received via email.

Table 1: How we engaged

	<div>Key dates</div> <ul style="list-style-type: none">• 7 April 2025: Consultation paper distributed to targeted stakeholders for feedback.• 8 May 2025: Submissions on the consultation paper closed.• 12 August: Final decision paper published.• 12 September 2025: Electricity Customer Transfer Code of Practice and Electricity Customer Metering Code of Practice revocation takes effect.
	<div>Methodology</div> <p>We provided key stakeholders with the opportunity to engage with us.</p> <p>We distributed a consultation paper for targeted consultation on 7 April 2025. The paper outlined our rationale for reviewing and proposing to revoke the codes. We sought submissions from targeted stakeholders. Stakeholder consultation closed on 8 May 2025, and we considered and incorporated stakeholder feedback into our final decision.</p>
	<div>Number of participants</div> <p>We distributed our consultation paper to:</p> <ul style="list-style-type: none">• 5 electricity distribution businesses• 5 consumer and community groups• 28 electricity retailers• 12 embedded network operators• 3 government departments and agencies

- Energy Safe Victoria
- AEMO
- AEMC
- Energy and Water Ombudsman Victoria



Number of submissions received

- We received nine written submissions in response to our consultation paper.

These submissions were from:

- the Australian Energy Council
- the Australian Energy Market Operator
- AGL
- AusNet
- CitiPower, Powercor & United Energy
- Energy On
- Engie
- Jemena
- Origin.

Appendix B – Amendments to other codes of practice

The table below details references to the Transfer Code or Metering Code that are present in the commission's other codes of practice. Amendments to these codes to remove reference to these instruments will be made within due course, following the Transfer and Metering Codes effective revocation date.

Code of practice administered by commission	References to the Transfer Code	References to the Metering Code
Energy Retail Code of Practice	As a note to clause 115 (notice to small customers where transfer delayed).	As a note to clause 63 (Contents of bills).
	Note reads: <i>Additional requirements in relation to customer transfers are contained in the Electricity Customer Transfer Code.</i>	Note reads: <i>Additional obligations in relation to the provision of metering information to small customers are contained in the Electricity Metering Code and the Gas Distribution Code of Practice.</i>
	The Transfer Code is also included in 'definitions' section.	As a note to clause 69 (Billing disputes) Note reads: <i>Additional obligations in relation to meter testing are contained in the Electricity Metering Code and Gas Distribution Code of Practice.</i>

		The Metering Code is also included in 'definitions' section.
Electricity Distribution Code of Practice	Not applicable	<p>Clause 6 (Metering).</p> <p>This clause requires electricity distribution businesses and customers to comply with the NER, Metrology Procedure and Metering Code.</p> <hr/> <p>The Metering Code is also included in the 'interpretation' section.</p>