

Submissions to the Public Lighting Code of Practice Review – Consultation Paper

Submissions received through Engage Victoria

From 28 August to 26 September 2025, the commission accepted submissions on our Public Lighting Code of Practice Review – Consultation paper via Engage Victoria. We have used these submissions to inform our final decision.

Date submitted: 18 September 2025

Name: Gannawarra Shire Council

Stakeholder/Interest Group: Community member

Question 1. Do you have any concerns regarding the proposed revocation of the Public Lighting Code of Practice? Please elaborate.

Yes. While Council acknowledges that many provisions of the current Code have been superseded by other regulations and that new technologies such as LEDs reduce the relevance of some obligations, the complete revocation without careful transfer risks leaving gaps.

The Code has provided Councils with enforceable obligations on distributors for two decades. Its removal could weaken protections unless equivalent obligations are clearly embedded in the Electricity Distribution Code of Practice. Councils are concerned that, without a standalone Code, public lighting issues may become less visible or prioritised. Council therefore supports revocation only if all critical provisions — data access, minimum service standards, billing transparency, and dispute resolution — are fully transferred, enforceable, and maintained in a way that ensures continuity for Councils and communities.

Question 2. Are there any other provisions in the Public Lighting Code of Practice we should consider retaining and transferring (other than those already proposed to be)? Please elaborate.

Yes. From a Council perspective, it is important that the following obligations are explicitly retained and transferred:

1. Distributor data provision and reporting requirements (asset lists, spatial data, lamp/pole type, installation/replacement history).
2. Minimum operational and fault response standards, including guaranteed service levels.
3. Clear processes for standard and non-standard fittings, with approval timelines and cost

responsibilities.

4. Design and notice requirements for new lighting or alterations, ensuring alignment with AS/NZS 1158 and local planning requirements.

5. Billing transparency and published charge schedules to support long-term financial planning.

6. Dispute resolution pathways, including escalation to EWOV.

These obligations remain critical for Council's asset management, budgeting, public safety and service accountability, even if other parts of the Code are outdated.

Question 3. Would public lighting customers prefer only negotiating specific service standards with distributors, rather than having minimum obligations for distributors (by transferring service standards to the Electricity Distribution Code of Practice)? Please elaborate

Councils would not prefer a purely negotiated model. Minimum obligations are needed to maintain consistency and safety across Victoria, prevent inequity between larger and smaller municipalities, and provide certainty for financial and service planning.

A hybrid approach is preferred: retain baseline service standards in the Electricity Distribution Code of Practice, while allowing scope for Councils and distributors to negotiate variations where appropriate (for example, decorative or heritage lighting). This ensures a fair minimum standard is preserved while maintaining flexibility.

Question 4. Do you have any concerns regarding the transferred provisions to the Electricity Distribution Code of Practice starting from 1 January 2026? Please elaborate.

Yes. Council has concerns about:

1. Transitional readiness, particularly around timely provision and reconciliation of distributor asset data (clauses 5.1–5.2 in the Code).

2. Contractual and billing alignment, with potential for budget impacts if charge structures change.

3. The need to preserve dispute resolution pathways and guaranteed service levels.

4. Operational clarity during emergencies and storm events.

Council recommends a phased and consultative transition with clear data exchange timetables, transparent billing schedules and training for Councils to ensure no reduction in service quality or financial certainty.