

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: 28 August 2025

Name: Liam Clifford

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, I do not think it should be revoked. Even with the current GSL, many distributors take months to repair broken lighting (even after it has been reported via their website portal), and when it is replaced, it is often without LED replacements.

In addition, there are many conflicting parties that own or maintain public lighting, and this causes issues where no party wants to take responsibility for the lighting assets, and it just remains broken for years (e.g. pedestrian lighting under Mt Alexander Rd Travancore, parallel to the Moonee Ponds Creek, or the shared path that's connects to the main Yarra trail under the Chandler Highway, Kew).

Further deregulation will see more broken lighting not being fixed within a timely manner.

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, public lighting should be continued to be inspected at least 3 times a year.

Section 2.1 - Good Asset management should not be revoked in favour for 'economic management' as this will guarantee that only the cheapest and worst quality lighting assets will be used (poor colour rendering, flickering, quick to dim or break).

Section 5.1.2 should be retained, as again it already is hard for the public to hold the lighting assets owner response to fix the lighting. Removing databases will ensure that there are

further delays to repairs, as no one will want to take the 'burden' and cost of fixing the assets, when they cannot 100% be certain it is their asset.

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

NA

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.

See above.