

# 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.

The Victorian Greenhouse Alliance's (VGA) submission was provided in two documents (a cover letter and feedback to specific clauses and definitions in our draft Electricity Distribution Code of Practice markup (version 3)). Table 1 summarises VGA's feedback to specific clauses and definitions in the draft Electricity Distribution Code of Practice.

**Date submitted: 25 September 2025**

**Name: Victorian Greenhouse Alliance (VGA)**

**Stakeholder/Interest Group: Alliance of local councils**

**Table 1 – Public Lighting Code of Practice Review – VGA Feedback**

| Stakeholder                                                                                  | VGA feedback to the draft Electricity Distribution Code of Practice                                                                                                                                              |
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| <b>Victorian Greenhouse Alliance</b><br><br><b>(VGA is an alliance of 70 local councils)</b> | <b>Fault report definition</b><br><br><i>(a) distributor's 24 hour call centre or digital reporting system receives a report of a fault (from any source).</i>                                                   |
|                                                                                              | <b>Introduce a new definition of SLCMS</b><br><br>Recommend also a definition of Smart Lighting Central Management System (SLCMS) as we refer to it several time throughout the comments.                        |
|                                                                                              | <b>Lamp definition</b><br><br>Recommend aligning with definitions in AS 1158.0 i.e.: The generic term for the light source in a luminaire.                                                                       |
|                                                                                              | <b>Major Roads definition</b><br><br>Recommend redefining this as per DTP (i.e. remove Melway reference).<br><br>Major road means a road designated by the Victorian Department of Transport as 'M', 'A' or 'B'. |
|                                                                                              | <b>Non-major road lamps definition</b><br><br>Recommend changing this to:                                                                                                                                        |

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|  | <p><b><i>non-major road luminaire</i></b> 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.</p> <p><b>Non-standard fitting definition</b></p> <p>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.</p> <p>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.</p> <p><b>Standard fitting definition</b></p> <p>Replace the term ‘fitting’ throughout to ‘luminaire’ and to mean:</p> <p>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</p> <p><b>Fault reporting channel</b></p> <p>Electricity Distribution Code of Practice Clause 19.7.1 (a):</p> <ul style="list-style-type: none"> <li>- operate a 24 hour call centre and/or online platform to receive public and public lighting customer fault report; and</li> </ul> |
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|  | <p><b>Minimum standard - Non-major road lamp replacement</b></p> <p>Electricity Distribution Code of Practice Clause 19.7.1 (c)</p> <ul style="list-style-type: none"> <li>- replace <del>non-major road lamps at least every 4 years or otherwise</del> in accordance with industry best practice or as required by the public lighting standards;</li> </ul>                                                                                                                                                                                                                      |
|  | <p><b>Minimum standard – Photo-electric cell and smart control nodes replacement</b></p> <p>Electricity Distribution Code of Practice Clause 19.7.1 (e)</p> <ul style="list-style-type: none"> <li>- replace photo-electric cells and smart control nodes <del>at least every 8 years or otherwise</del> in accordance with industry best practice or as required by the public lighting standards;</li> </ul>                                                                                                                                                                      |
|  | <p><b>Minimum standard – 3 times annual patrols</b></p> <p>Electricity Distribution Code of Practice Clause 19.7.1 (f)</p> <ul style="list-style-type: none"> <li>- 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; 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).</li> </ul> |
|  | <p><b>Minimum standard – lamp useful life</b></p> <p>Electricity Distribution Code of Practice Clause 19.7.1 (g)</p> <ul style="list-style-type: none"> <li>- Replace with ‘useful’, i.e. DNSPs do not routinely replace assets at end of economic life.</li> </ul>                                                                                                                                                                                                                                                                                                                 |

### **Standard and non-standard fitting**

Recommend inserting Clause 3.2 and 3.3 from the Vic PL Code relating to Standard and non-standard fittings (replace fittings with either products or luminaires) - as these cover some basic product approvals and storage processes that are useful to ensure co9ntinue into the future.:

#### **3.2 Standard fittings**

3.2.1 A distributor must maintain a list of standard fittings. A distributor must provide a copy of its list of standard fittings to a public lighting customer on request, or upon any change to the list of standard fittings.

3.2.2 If a public lighting customer proposes the addition of a new item to the list of standard fittings the distributor must add the new item if it complies with the distributor's public lighting technical standards. The distributor must not unreasonably refuse the addition of a new item to the list of standard fittings if the public lighting customer has agreed to pay a fair and reasonable charge for operation, maintenance and repair of the proposed new standard fitting if used in public lighting. The distributor is not required to assess the compliance of a proposed new standard fitting unless the public lighting customer has agreed to

pay any fair and reasonable fee to the distributor for assessing such compliance.

### 3.3 Non-standard fittings

If a public lighting customer specifies the use of non-standard fittings or light types with non-standard fittings the distributor must offer to install the lighting on fair and reasonable terms. In considering the acceptability to it of non-standard fittings, the distributor must have regard to its public lighting technical standards.