



17 May 2022

Ms Kate Symons  
Chair  
Essential Services Commission  
Level 37, 2 Lonsdale Street  
Melbourne Victoria 3000

Submitted electronically: [energyreform@esc.vic.gov.au](mailto:energyreform@esc.vic.gov.au)

Dear Ms Symons

**RE: Making the Electricity Distribution Code of Practice – Consultation**

Origin Energy (Origin) appreciates the opportunity to provide a submission in response to the Essential Services Commission's (ESC) consultation Making the Electricity Distribution Code of Practice.

Origin supports the intent of the ESC's administrative amendments to simplify and clarify obligations in the Code of Practice and align the code with national regulatory frameworks. We expect that these amendments will make obligations easier to follow, and compliance monitoring more efficient.

We support the extension of information concerning planned interruptions to exempt distributors as per clause 11.5. However, we seek clarification regarding the requirement for an exempt distributor (in particular, an embedded network service provider) to provide at least 4 business days written notice of a planned interruption.

We note for example that the ability of an exempt distributor to provide the required prior notice of a planned interruption may be contingent on receiving information from the licenced distributor. We question whether the exempt distributor (the embedded network) would be in breach if they had not received notice of a planned interruption from the licensed distributor (or receive the notice delayed) and therefore were not able to provide the required notice to embedded network customers.

The Energy Retail Code of Practice requires the exempt seller to notify customers within one business day of receiving notice from a distributor (clause 170 (1)(d)). We consider that adopting similar wording in the Energy Distribution Code of Practice would clarify that the obligation on the exempt party is conditional on them receiving notification from the licensed distributor in the first instance.

Alternatively, it may be the case that clause 11.5 only applies to exempt distributors for interruptions within the embedded network (which are under the control of the exempt distributor) rather than the broader network. In this case the embedded network service provider is directly responsible for providing notifications regarding interruptions to the embedded network. We seek clarification on the application of clause 11.5.

If you have any questions regarding this submission, please contact Gary Davies in the first instance at

Yours sincerely

A handwritten signature in black ink, appearing to read "Sean Greenup", written over a white rectangular background.

Sean Greenup  
Group Manager Regulatory Policy