10 Sept 2025

Aaron Yuen
Director, Analysis and Reform, Energy
Essential Services Commission
Level 8, 570 Bourke Street, Melbourne VIC 3000
aaron.yuen@esc.vic.gov.au

Submitted online: https://engage.vic.gov.au/

Dear Mr Yuen,

Re: Reviewing the Public Lighting Code of Practice

On behalf of our members, the Victorian Greenhouse Alliances (VGAs) are pleased to provide this response to the Essential Services Commission (ESC) review of the Public Lighting Code (the Code).

The VGAs are formal partnerships of local governments and statutory agencies driving climate change action across Victoria's municipalities. The VGAs deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building and regional partnerships.

Further to our discussions with you on 5 August 2025, we welcome the review of the Code and the steps the ESC have taken to proactively engage with the Australian Energy Regulator (AER) following our response to the Victorian Electricity Distribution Price Review 2026-31.[1] The Code is clearly out of date due to technology changes, which impacts the operation and management of street lighting. Updating the Code is important, as it remains a key method by which the Distribution Network Service Providers (DNSPs) and the AER test the assumptions within the DNSPs' regulated pricing models.

We support the ESC's proposal to revoke the Code and transfer the relevant obligations to the Electricity Distribution Code of Practice as set out in the *Appendix B draft mark-up* on the Engage Victoria website.[2] To streamline and simplify the feedback process, we have provided comments and proposed additional minor changes in the attached (*Appendix B marked-up draft VGA Comments*).

We would welcome the opportunity to speak with you directly regarding this submission and address any clarifications or outstanding questions.

Greenhouse Alliances and contacts

- Barwon South-West Climate Alliance (BSWCA), Sue Phillips, Executive Officer, sue.phillips@bswca.org
    - City of Greater Geelong
    - Golden Plains Shire
    - Surf Coast Shire
    - Borough of Queenscliffe
    - Colac Otway Shire
    - Warrnambool City Council

[1] https://eaga.com.au/wp-content/uploads/2025/05/EDPR-2026-31-LG-Response-final-2025-05-13.pdf
[2] https://engage.vic.gov.au/download/document/42238

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- Central Victorian Greenhouse Alliance (CVGA), Annika Kearton, Chief Executive Officer, ceo@cvga.org.au
    - Ararat Rural City Council
    - Ballarat City Council
    - Buloke Shire Council
    - Central Goldfields Shire Council
    - Gannawarra Shire Council
    - Greater Bendigo City Council
    - Hepburn Shire Council
    - Loddon Shire Council
    - Macedon Ranges Shire Council
    - Mildura Rural City Council
    - Mount Alexander Shire Council
    - Pyrenees Shire Council
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    - South Gippsland Shire Council
    - Wellington Shire Council
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    - Benalla Rural City Council
    - Campaspe Shire Council
    - Indigo Shire Council
    - Mansfield Shire Council
    - Mitchell Shire Council
    - Moira Shire Council
    - Murrindindi Shire Council
    - Towong Shire Council
    - Strathbogie Shire Council
    - Wangaratta Rural City Council
    - Wodonga City Council
    - Alpine Resorts Victoria
    - Goulburn Broken Catchment Management Authority
    - North East Catchment Management Authority

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    - Manningham City Council
    - City of Melbourne
    - Merri-bek City Council
    - Nillumbik Shire Council
    - City of Whittlesea
    - City of Yarra

- South East Councils Climate Change Alliance (SECCCA), Helen Steel, Chief Executive Officer, hsteel@seccca.org.au
    - Bass Coast Shire Council
    - Bayside City Council
    - Cardinia Shire Council
    - City of Casey
    - Mornington Peninsula Shire Council
    - City of Kingston
    - City of Port Phillip

- Western Alliance for Greenhouse Action (WAGA) Fran MacDonald, Executive Officer, franm@brimbank.vic.gov.au
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    - Maribyrnong City Council
    - Hobsons Bay City Council
    - Melton City Council
    - Moonee Valley City Council
    - Moorabool Shire Council
    - Wyndham City Council

This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.

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