



# Electricity Code Consultative Committee

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Our ref: D293610  
Contact: Joanne DANIEL

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Steve Edwell  
Chair  
Economic Regulation Authority  
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Dear Chair

## **Advice on proposed amendments to the *Code of Conduct for the Supply of Electricity to Small Use Consumers 2022***

On 5 May 2025, the Economic Regulation Authority (ERA) published its draft decision to amend the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022* (Code). The ERA referred its proposed amendments to the Electricity Code Consultative Committee (ECCC) for advice. The ECCC considers that the amendments proposed in the ERA's draft decision are broadly consistent with its [Final Review Report](#).

Following public consultation under section 89 of the *Electricity Industry Act 2004* (Act), the ECCC received six submissions on the proposed amendments. On 5 June 2025, these submissions were published on the [ERA website](#). The six submissions contained broad support for the ERA's proposed amendments and included suggestions for minor changes to clarify obligations for licensees.

The ECCC has prepared this letter of advice with consideration of comments made in the submissions, pursuant to section 87 and 88 of the Act. This advice is intended to clarify the obligations on retailers and assist customers to understand the protections afforded to them under the Code.

Firstly, the Life Support Equipment (LSE) obligations require three minor improvements to assist with implementing the proposed amendments.

1. Improve readability of clauses 82 and 85 by placing the definitions of “medical practitioner confirmation” and “healthcare practitioner confirmation” in cl. 3, Terms. Placing the definitions in cl. 3 will also assist stakeholders that may wish to apply these concepts to the [Life Support Equipment Subsidy Scheme](#) or other purposes.
2. Retain “someone else residing at the supply address” in cl. 84 for distributors notifying of a planned outage at an LSE supply address for both business and residential customers. Removing this wording may unintentionally make it more difficult for front-line staff to promptly notify affected customers in-person.
3. To support consumers, licensees, and practitioners to understand the changes, the ERA should develop and publish accessible guidance material on LSE entitlements.

Secondly, the ECCC requests two minor changes to minimise implementation challenges.

1. Cl. 3 - Retain the existing obligation for the 'National Interpreter Symbol'. The proposed amendment to specify the colour and form of the symbol presents an implementation challenge as the style of the symbol currently varies slightly across a licensee's many different publications. Instead of implementing the same symbol in all publications from January 2026, retailer representatives on the ECCC committed to apply a consistent symbol when each publication comes up for review.
2. Cl. 28 – Clarify the proposed wording on refunding amounts paid for meter testing and ensure that the amendment does not duplicate the existing cl. 30 "Overcharging".

The ECCC notes its support for the proposed change to 'Complaints' in cl. 3, despite one submission querying the amendment. The proposed change reflects the ECCC's intent to align the Code with the *Interpretations Act 1984*.

Submissions from the Australian National University (ANU), Expert Consumer Panel (ECP), and Economic Abuse Reference Group WA (EARGWA) engaged with broader policy issues including the principles underpinning the First Nations Clean Energy Report and the potential for economic abuse to be perpetrated via energy accounts.

The ANU, ECP and EARGWA commented on four issues that were evaluated during the ECCC's review, but the submissions did not provide new information for consideration. These comments related to providing information to frequently disconnected pre-payment meter customers (cl. 66), informing customers of different tariffs or products (cl. 69), regulating increases to service payments (cl. 94-99) and a proposal to cease disconnections for non-payment of bills during extreme weather events.

The ECCC has no further feedback on the ERA's draft decision and notes that the proposed changes to the Code are expected to take effect from 1 January 2026.

Should you have any queries, please contact the Executive Officer at [eccc@erawa.com.au](mailto:eccc@erawa.com.au).

Yours sincerely



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Chair, ECCC