



1 September 2017

Jon Hocking
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Dear Mr Hocking

Re: SSROC SLI Program Submission on the 2019-24 Endeavour Energy Directions Paper

Thank you for the opportunity to comment on the 2019-2024 Endeavour Energy Directions Paper.

The Southern Sydney Regional Organisation of Councils (SSROC) makes this submission on behalf of 30 Councils participating in the SSROC [Street Lighting Improvement Program](#). While largely served by Ausgrid, we note that the five councils participating in the SSROC SLI Program (Canterbury-Bankstown, Parramatta, Cumberland, Ryde and Hornsby) are all partly served by Endeavour Energy and that some of the issues raised below apply to all NSW councils provided with street lighting services by NSW DNSPs.

As acknowledged by the AER in a 2013 review of public lighting¹, public lighting in NSW is currently an effective monopoly of the NSW DNSPs and the prospects for meaningful contestability and any subsequent competition are extremely limited. SSROC can see no evidence that this situation has changed since the last pricing review. A prerequisite for competition is regulatory reform that introduces an access framework and contestability in the provision of the public lighting services and no such reform has eventuated since the previous AER review, let alone resulted in effective competition. SSROC makes this submission with this broad context in mind which underlines the need for a clearer basis of service for what is an essential public service.

In parallel with the Endeavour Energy Directions Paper consultation, we note that the NSW Department of Planning & Environment – Division of Resources & Energy has convened a Public Lighting Forum to assist in the drafting of a revised NSW Public Lighting Code. At present, there is only a voluntary and limited Public Lighting Code and there are no current contracts and no minimum service levels defined in regulation. SSROC's understanding is that the Department's intent is to introduce a mandatory NSW Public Lighting Code that would establish minimum binding service levels for the DNSP provision of the service.

It is in this context that SSROC suggests that Endeavour Energy adopt the following priorities for the forthcoming regulatory period:

1) **SUPPORT FINALISATION OF PUBLIC LIGHTING CODE**

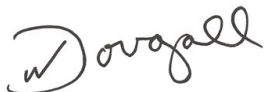
Endeavour Energy should support the near-term finalisation of a mandatory and expanded NSW Public Lighting Code to clarify the basis of service before the AER pricing review proceeds further.

1 AER Stage 1 Framework and Approach, NSW Electricity Distribution Network Service Providers, page 36, March 2013

- 2) **WRITTEN AGREEMENT ON TECHNOLOGY CHOICE**
Endeavour Energy should seek written agreement with the councils it serves on a portfolio of Category P and Category V LED luminaires, agreement on a process for keeping luminaire technology current and agreement to discontinue the installation of all non-LED legacy luminaire types.
- 3) **PROGRESS ACCELERATED LED REPLACEMENT NEGOTIATIONS**
SSROC recognises the pioneering work that Endeavour Energy and WSROC have done in with Category P LED replacements. Endeavour Energy should now enter into comprehensive negotiations with the councils it serves on a large-scale replacement program encompassing on all legacy Category P and Category V luminaires with LEDs
- 4) **PROGRESS SMART CONTROLS NEGOTIATIONS**
Endeavour Energy and councils should initiate work to jointly explore the case for widespread deployment of smart controls in conjunction with an accelerated LED replacement program. These negotiations should include consideration of how future smart city devices might be deployed in conjunction with the smart controls network (including issues such as device ownership, data access, data ownership, access to poles for future smart cities devices and cybersecurity).
- 5) **PRICE MODELLING DISCLOSURE**
In seeking to improve confidence in street lighting costs and service levels, Endeavour Energy should release its proposed 2019-2024 street lighting pricing model to councils at the outset of the 2019-2024 pricing review process including all underlying assumptions.
- 6) **MAINTENANCE DATA DISCLOSURE**
In seeking to improve confidence in street lighting service levels and to aid council decisions on future technology choice, Endeavour Energy should provide councils with comprehensive local and network-wide data on spot repairs and spot replacements by technology type as well as night patrol reports and bulk lamp replacement data.

SSROC welcomes further discussion with Endeavour Energy about this submission, the NSW Public Lighting Code and the 2019-2024 pricing review.

Yours faithfully



Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils