



28 October 2021

Alisa Toomey  
Senior Advisor  
Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2000

Online submission: <https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Alisa,

**Submission to the AEMC Review of the Regulatory Framework for Metering Services  
(AEMC Ref: EMO0040)**

Thank you for the opportunity to comment on the future framework for metering services in the National Electricity Market.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of eleven local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.8 million, one third of the population of Sydney. SSROC seeks to advocate for the needs of our member councils and bring our regional perspective to the issues raised.

SSROC's Street Lighting Improvement (SLI) Program covers a wider footprint than our members. A total of 29 councils in metropolitan Sydney, the Central Coast and Hunter, work closely together to improve the provision of street lighting services for which they are responsible. That service is mainly provided by Ausgrid to the councils. The councils have sought to work together with Ausgrid through the SLI Program for 18 years, covering a range of pricing, technology and service-related issues. The councils participating in the program collectively encompass over 230,000 street lights or more than 90% of Ausgrid's lighting and more than 10% of the street lights in the National Electricity Market.

SSROC's SLI Program has been closely tracking international developments with smart street lighting controls for more than five years with the SLI Program managers having met with most of the major suppliers and many of the largest customers (including parties such as the City of Los Angeles, Georgia Power, a number of large UK councils, the City of Auckland and the Government of Singapore). SSROC has also assisted Ausgrid in staging initial smart controls trials.

Based on this work, SSROC believes that it is strongly in councils' interests that they be able to adopt smart street lighting controls to secure a range of energy savings, GHG abatement, maintenance, service-level improvements, safety and many other benefits that this technology offers. However, we are also aware that dimming street lighting in the off-peak (as is now done widely around the world) and several other benefits available with smart street lighting controls entail variable energy consumption and therefore do not fit well under the existing Type 7 metering



approach to unmetered loads.

In recent months, SSROC and Ausgrid have been negotiating a potential deployment of smart controls involving at least 60,000 street lights on main roads. The energy savings benefits of smart street lighting controls are a major contributor to the business case for such a smart controls rollout. SSROC therefore welcomes the AEMC considering reforms in this area that would allow for energy savings initiatives of customers using these systems to flow through on their bills.

SSROC was this week provided with a copy of the Queensland Department of Transport and Main Roads (DTMR) submission to the AEMC Review. The DTMR submission is focused on smart street lighting controls in the context of a large current project that they are rolling out on the Queensland main roads network. I am writing to express SSROC's strong support for the DTMR submission. While they may be based in a different state, the benefits of smart street lighting controls that they have identified as well as the challenges with the current approach fully align with our experience.

SSROC would strongly welcome AEMC reforms that facilitated the widespread rollout of smart street lighting controls and would be pleased to comment on any detailed proposals in this area or provide further information as useful.

Should you have any further enquiries in relation to this letter, please contact me by email [ssroc@ssroc.nsw.gov.au](mailto:ssroc@ssroc.nsw.gov.au).

Yours Sincerely

A handwritten signature in black ink, appearing to read "H Sloan", is positioned below the "Yours Sincerely" text.

Helen Sloan  
**Acting General Manager**  
**Southern Sydney Regional Organisation of Councils**

cc: Karthik Venkataraman – GM Customer and Partner Experience, Ausgrid  
Kevin Smith – Key Customer Manager, Ausgrid