



11 February 2022

IPART Energy Networks Regulation Committee  
Online submission at: [ipart.nsw.gov.au/Home/Reviews/Have-Your-Say](http://ipart.nsw.gov.au/Home/Reviews/Have-Your-Say)

To whom it may concern

**Review of electricity network operators' licences:  
Issues Paper and Draft Report**

Thank you for the opportunity to comment on the issues paper and draft report. 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'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 which they fund and for which they are responsible. That service is mainly provided by Ausgrid to the councils and is not contestable. The councils have therefore sought to work together with Ausgrid through the SLI Program for 18 years, covering a wide range of issues. The councils participating in the program collectively encompass over 230,000 street lights or more than 90% of Ausgrid's lighting and 40% of the street lights in NSW.

I have reviewed the submission by the Southern Lights NSW Group, and fully support the Group's position, which aligns with SSROC's SLI Program views for the same reasons: SSROC also provides input to the reviews of the Public Lighting Code, and similarly advocates for its member councils in relation to the provision of public lighting services. We too have a strong interest in the current review. In particular SSROC emphasises:

- the importance of street lighting to road safety, and very high cost-benefit ratio;
- that the Public Lighting Code is the only mechanism whereby councils can enforce their rights in relation to the delivery of public lighting services;
- should compliance with the Code cease to be a mandatory licence condition, compliance would effectively be voluntary once again, which would not be acceptable to SSROC;
- councils spend well over \$100 million a year of ratepayer dollars on public lighting services, with mandatory compliance with the Code the sole means of ensuring adequate service delivery.



SSROC further supports the suggestion that simplified reporting by DNSPs could reduce their cost burden while still providing councils with meaningful assessments of the services provided, and enhancing DNSP accountability.

In summary, SSROC's position aligns entirely with that of the Southern Lights Group in not supporting the replacement of the current licence condition with any lesser condition.

I would be happy to discuss our concerns and to answer any questions that you might have. Please feel free to contact me at [ssroc@ssroc.nsw.gov.au](mailto:ssroc@ssroc.nsw.gov.au) or 02 8396 3800.

Yours sincerely

A handwritten signature in black ink that reads 'H Sloan'.

Helen Sloan  
**Chief Executive Officer**  
**Southern Sydney Regional Organisation of Councils**

Attached: copy of the Southern Lights submission referenced in this letter.

cc: Ms J Briggs, Chief Executive Officer, Riverina Eastern Regional Organisation of Councils