



19 January 2024

ATTN: Arek Gulbenkoglu  
General Manager  
Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

Via email: [AERresets2024-29@aer.gov.au](mailto:AERresets2024-29@aer.gov.au)

Dear Arek,

**RE: Ausgrid Determination 2024-29 – Revised Public Lighting Proposal**

Thank you for the opportunity to comment on the public lighting aspects of Ausgrid's revised 2024-29 pricing proposal. In summary and as detailed below, SSROC remains broadly supportive of Ausgrid's 2024-29 public lighting proposal.

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.

The SSROC 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 street lighting service is mainly provided to the councils by Ausgrid. The councils participating in the program collectively encompass over 230,000 street lights or more than 90% of Ausgrid's lighting and about 40% of the street lights in NSW.

SSROC and the councils in the SLI Program have sought to work together with Ausgrid through the SLI Program for many years on a range of pricing, technology and service-related issues.

Ausgrid and SSROC have previously reached agreement on more than 180,000 LED replacements and recently reached agreement on a further 62,000 LED replacements on main roads (in conjunction with smart controls and with additional ports for smart city sensors).

With reference to the revised public lighting proposal, SSROC makes the following comments:

- **Support for Ausgrid's Revised Submission**

On balance, SSROC continues to support Ausgrid's public lighting pricing proposal. SSROC does not necessarily agree with every assumption and input in Ausgrid's model but believes that a complex pricing model such as this must ultimately be considered in totality. SSROC is satisfied that the overall outcome is a fair and reasonable proposal. As per SSROC's submission of 12 May 2023 in response to the draft proposal SSROC identified eight specific reasons that it felt comfortable supporting Ausgrid's proposal and each of those remains valid.

- **Welcome Transparency**

As per our previous submission at the draft stage, consultations with Ausgrid have continued to be conducted in a transparent manner with Ausgrid offering SSROC access to

its analyst and its updated price modelling. SSROC has been given the opportunity to question and challenge key assumptions as well as having received full explanations of changes and corrections made to the model between the draft and revised stage. This degree of transparency and responsiveness is to be commended and SSROC trusts that it sets a solid precedent for future determinations.

- **Price Reductions Welcome**

If Ausgrid's revised proposal is approved by the AER in its Final Determination, Councils will welcome price reductions in 2024-25. In future determinations, we'd encourage greater transparency about the overall and customer-specific price impacts of the initial proposal and the revised proposal. We'd also encourage greater transparency about the anticipated price change in the network distribution component of public lighting (e.g., Ausgrid Network Tariff EA401).

- **Column Pricing**

Subsequent to the Draft Proposal, a number of questions have arisen about Ausgrid's column pricing. In reviewing the Draft Determinations for the three NSW DNSPs, it appears that Ausgrid's column pricing is some 70-90% higher than the other DNSPs. Ausgrid has identified its traffic control requirements and use of footings as being key reasons for the higher prices. However, given the degree of price difference, we'd ask that the AER gives this matter some consideration. We note that column pricing has disproportionate impact on councils in the Central Coast and Hunter who tend to have a higher proportion of such assets.

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

Yours Sincerely

A handwritten signature in blue ink that reads "H Sloan".

Helen Sloan  
**CEO**  
**Southern Sydney Regional Organisation of Councils**