



14 April 2025

ATTN: Terry Niemeier  
Director, Program & Market Development – NSW Energy Security Safeguard  
Department of Climate Change, Energy, the Environment and Water (DCCEEW)  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2150

Via email: [sustainability@environment.nsw.gov.au](mailto:sustainability@environment.nsw.gov.au)

Dear Terry,

**RE: Energy Savings Scheme Rule and Regulation Change 2025**

Thank you for the opportunity to comment on proposed changes to the ESS Rule and Regulations. We have recently had the opportunity to review the joint submission of National Carbon Bank Australia (NCBA) and Green Energy Trading (GET). We are writing in support of those sections of the submission related to public lighting.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of twelve 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 Ausgrid have previously reached agreement on more than 2040,000 LED street lighting replacements. This is now the largest LED street lighting deployment in Australia. Many of these replacements have taken place under the ESS.

While there has been superb progress on street lighting replacements, we are aware that progress with the replacement of councils' own legacy public lighting has been much slower. Councils generally own public lighting in parks, reserves, bike paths, beachfronts and other public spaces. While the DNSP owns most of the street lighting some councils, including the City of Sydney, also own lighting on streets.

As outlined by NCBA, decorative lighting is much more costly than conventional street lighting and has associated aesthetic and other complexities (e.g., vandalism resistance, environmental priorities). This makes both the business case for replacement and the procurement process more challenging.

To provide an important incentive to progress the replacement of councils' legacy lighting we therefore strongly support the proposed amendment of Clause 9.4A.1(b) to include councils under this part of the Rule. We also agree that councils' specific procurement requirements under Section 55 of the NSW Local Government Act and their own procurement policies should be

recognised as an approved 'certification scheme' in the eyes of the Scheme Administrator.

With regards to LED to LED upgrades, Ausgrid and a number of councils participating in the SSROC SLI Program were early Australian leaders in LED deployment from about 2012-2013 onwards. There have been improvements in LED efficiency of some 30-40% since that time. Smart lighting controls have also emerged that are able to save even more energy by trimming excess lighting and dimming in the off peak. Consideration should therefore be given in the reform process as to how LED to LED upgrades and the adoption of smart street lighting controls can best be encouraged by all bodies managing public lighting.

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



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