

15 May 2024

Mr Kris Funston
Executive General Manager
Australian Energy Regulator
SAPN@aer.gov.au

Dear Mr Funston

Public Lighting Working Group Submission re SAPN 2025-30 Regulatory Proposal

The Local Government Association writes on behalf of councils that participate in the South Australian Public Lighting Working Group (PLWG), who welcomes the opportunity to make a submission in relation to SA Power Networks' 2025-30 Regulatory Proposal.

Since late 2018, the PLWG has operated to provide a practical and representative interface between SA Power Networks and South Australian public lighting customers, including councils and the Department of Infrastructure and Transport (DIT).

The PLWG has improved the relationship and level of communication between SA Power Networks and the local government sector. The information provided through the PLWG has enabled councils to have a broader understanding of public lighting services and the ability to provide input into future processes.

The PLWG has been actively discussing service level expectations in preparation for SA Power Networks' submission of its 2025-30 regulatory proposal. It also acknowledges SA Power Networks held two focussed conversation workshops with public lighting councils in October 2022 and April 2023 to specifically consult on its regulatory proposal for public lighting. While there was general agreement to maintain many of the existing public lighting service levels, this consultation has resulted in the following changes to service levels being requested by public lighting customers for the 2025-30 period:

- Updating the column inspection and replacement service levels to only replace columns with an 'Extreme' condition rating. Columns will continue to be inspected every 5 or 10 years based on corrosion zones, with no re-inspections required.
- Updating repair service standards for Street Light Out (SLO) from the current 5 business days for metro and 10 business days for country areas, to 5 business days for simple faults and 30 business days for complex faults (irrespective of their location). This aligns with repair standards in other jurisdictions.
- Removal of the bulk lamp replacement program for High Intensity Discharge (HID) lighting, noting the transition to Light Emitting Diodes (LED) and associated difficulty with obtaining replacement globes.

The PLWG appreciates and commends SA Power Networks for the engagement process that it undertook in preparing its proposals and is comfortable that its proposal is aligned with the preferences stated by councils that were engaged in the process.

The PLWG would like to acknowledge the important role the Australian Energy Regulator (AER) plays in providing for fair and transparent pricing of public lighting services. It encourages the AER to make a price determination which represents the best value proposition for the community, industry, and all levels of government.

Please feel free to contact me if you have any further queries.

Yours sincerely



Nathan Petrus
Chair, Public Lighting Working Group