

17 April 2024

Mr Kris Funston  
Executive General Manager  
Australian Energy Regulator  
[SAPN@aer.gov.au](mailto:SAPN@aer.gov.au)

**Dear Mr Funston**

**Submission re SAPN 2025-30 Regulatory Proposal**

I am writing on behalf of the Vegetation Management Advisory Group regarding the Regulatory Proposal 2025-30, particularly in relation to the proposed expenditure for bushfire mitigation strategies.

The Arborist Reference Group (now Vegetation Management Advisory Group) was established in 2014 to provide independent horticultural and arboricultural advice on strategic vegetation management initiatives. It consisted of representatives with a wide range of experience and knowledge within the horticulture and vegetation management sector. As the chair taking over from [REDACTED], I am joined by [REDACTED] from the University of Adelaide, [REDACTED] from Trees for Life, [REDACTED] from Botanic Gardens of SA, and [REDACTED] from Green Adelaide. Together with representatives from Council, our vegetation contractor Active Tree Services, community representatives and several SA Power Networks staff, we feel confident to provide advice on SA Power Networks' vegetation management strategy.

We believe that SA Power Networks has created a proposal that accurately reflects the stakeholder engagement process and sets out clear guidelines to advance the safe and reliable delivery of electricity to energy consumers in South Australia. The consultation with customer groups through the focussed conversations and People's Panel process reflected an openness that should be commended.

The challenges of managing bushfire risk and vegetation were communicated appropriately throughout the engagement process and outlined clearly in the proposal. While the former Arborist Reference Group and other vegetation consultative groups recommended an increase in funding for undergrounding of powerlines in high bushfire risk areas, the decision to direct funding to public safety power shutoff mitigation reflects the opinion of the People's Panel. SA Power Networks should continue to advocate State Government to ensure ongoing funding for undergrounding initiatives given the strong community sentiment, particularly in high bushfire risk areas.

The Vegetation Management Advisory Group also supports the inclusion of woody weed and sapling removal programs in the current regulation spending period with no new expenditure proposed for 2025-30.

Overall, SA Power Networks has engaged in a robust engagement process and has developed a proposal that reflects an aim to balance cost of living pressures with investment in safety and reliability.



Please feel free to contact me at [REDACTED] if you have any queries.

Yours sincerely



Kim Syrus

Newly appointed Chair, Vegetation Management Advisory Group and Customer Advisory Forum  
Member