



Date: 22<sup>nd</sup> July 2014

Mr Chris Pattas  
General Manager, Networks  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3000

**SUBJECT: VICTORIAN EDPR 2016-2020 - AER's preliminary positions on a replacement framework & approach – Supplementary Information.**

Dear Mr Pattas,

A public media release was delivered by Standards Australia on the 17<sup>th</sup> July, that we believe is material to current considerations in relation to the Victorian EDPR Review for 2016-2020. We attach a copy of that media release.

Contained within the Public Lighting Code of Victoria, reference is made to a public lighting standard that has been the current version from time to time of AS/NZ1158 and AS/NZ 3771.

AS/NZS1158.6 was an evolution of the AS/NZ 3771 Standard and both standards contained very prescriptive normative language and relates to the Standard used for public lighting luminaires.

Reference needs to be made to Standards Australia as it appears it will be adopting an IEC Standard 60598.2.3 which is far less prescriptive and aligned with international trade laws as being performance based. We contend that for the benefit of DNSP's and Public Lighting Customers that Public Lighting be considered Negotiated Services to allow the flexibility to adopt technical specifications according to the needs of the DNSP and the customer in much the same way that the cost-build up models allow for differences between the needs of each DNSP. The market needs this flexibility.

Further discussion needs to occur within the next determination in relation to cost pass-throughs that may occur in relation to technology obsolescence relating to the 80 watt Mercury Vapour Lamps. After the United States ban of mercury vapour lamps in 2008, the European Union will follow their lead and phase out this technology by 2015.

Possibly Australia lighting manufacturers will be able to source alternatives from other countries who will not follow this ban but consideration has to be made and strategies allowed for so that customers are not unreasonably affected by a cost pass through. We would refer to our previous submission and refer to the "intent of the Public Lighting Code" that allows customers to vary any of their rights and obligations under Clause 1.4 of the PLC

and thereby choose if they do so, to fund the capital replacement of assets and then choose who maintains those assets, whether it be the DNSP or another third party and in doing so avoid any price rises relating to a cost pass through as a result of technology obsolescence.

A negotiated classification will at least provide this flexibility for customers and DNSP's.

If you require any further information, please do not hesitate to contact me on 0428 079 317 or email: [apcarey@citelum.com.au](mailto:apcarey@citelum.com.au)

Best Regards,

A handwritten signature in black ink that reads "Adam Carey". The signature is written in a cursive style with a large, stylized 'A' and 'C'.

Adam Carey  
Managing Director Australia NZ