

- 8470 8535
AER Regulatory Review



10 February 2010

Mr Chris Pattas
General Manager
Network Regulation South
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Dear Mr Pattas

Victorian Electricity Distribution Network Service Providers' Regulatory Proposals

Darebin City Council would like to register our serious concern regarding the magnitude of proposed increases in Operations and Maintenance charges for street lights proposed by Distribution Businesses. Darebin has street light services delivered by SP AusNet, Jemena and Citipower.

We note that the AER ruling on energy efficient lighting which set an Operations and Maintenance charge for T5 lighting was released in early 2009 and significant increases (in some cases in the order of 85%) are now proposed by Distribution Businesses prior to any large scale installations of the technology. We believe this is inappropriate and unjustified.

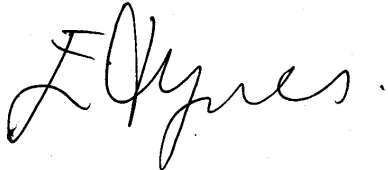
We also note that a significant lack of clarity remains around the monopoly or contestability status of various aspects of the street lighting service including bulk roll-outs and maintenance. Further, prices we have been quoted by Distribution Businesses to install T5 lighting for small scale installations has been more than double the amount quoted for bulk roll-out. This is a serious impediment to our intention to install T5 lighting in all new installations. We believe that these matters will require investigation and ruling via the AER as a matter of priority.

Darebin continues to work with the Northern Alliance for Greenhouse Action and the Municipal Association of Victoria to progress the installation of energy efficient street lighting

and to secure fair and reasonable costs and adequate service levels for street lighting. We plan to participate in a detailed submission to the review when the draft AER ruling is released later this year.

Please do not hesitate to contact me on 8470 8442 if you would like further information.

Yours sincerely

A handwritten signature in black ink, appearing to read "L. Hynes". The signature is fluid and cursive, with a period at the end.

Libby Hynes
Executive Manager, Environmental Sustainability

CC Ben Morris, Municipal Association of Victoria
Judy Bush, Northern Alliance for Greenhouse Action.