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13 July 2015

Mr Chris Pattas
General Manager – Network Investment and Pricing
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001
VICelectricity2016@aer.gov.au

Dear Chris

Invitation for Submissions – Public Lighting

I am writing in response to your request for submissions regarding the proposed negotiation process for dedicated public lighting.

Gannawarra Shire Council would like to put forward the following comments:-

- Gannawarra is a small municipality with approximately 890 total street/public lights;
- Gannawarra has estimated there is less than 40 dedicated street/public lights;
- Council would question the proposal put forward around being able to negotiate an OMR for dedicated street/public lighting;
- I have to question why allow Council to go to tender for OMR's and then not be able to choose a provider. From the information provided, it appears Council:
 - Can only negotiate with the current distribution business, or
 - Can only negotiate with another party if approved by current distribution business.
- It appears very unlikely another distribution business would tender a price in our area.

Council would contend that despite only having a small number of dedicated street/public lights, the proposal for dedicated street/public lighting OMR's to be negotiated is flawed and is not supported by Gannawarra Shire Council. Having no regulatory oversight of the dedicated street/public lights is not the preferred option moving forward when the ability to choose a contractor is inherently flawed.

Should you have any questions please contact Mr Adam Cooper on 5450 9333.

Yours sincerely

Geoff Rollinson
DIRECTOR INFRASTRUCTURE SERVICES