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27 August 2014

Mr Warwick Anderson
General Manager – Networks Branch
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601

FILE No:
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MARS/PRISM:



Dear Mr Anderson

Thank you for giving Holroyd City Council the opportunity to provide feedback on the Substantive Regulatory Proposal submitted by Endeavour Energy to the Australian Energy Regulator (AER).

Council's concerns relate to the issue of street lighting and submissions have been made previously through Western Sydney Regional Organisation of Councils (WSROC) in particular the document Public Lighting 2014-19 Framework Discussion Paper prepared by Trans Tasman Energy Group which remains valid and should be considered in this review.

Council welcomes the objective of Endeavour Energy to restrict their share of electricity cost to a rise of no more than the CPI however it should not be to the detriment of maintenance requirements which have previously been raised as a concern.

In addition as raised by other Councils, street lighting is currently a non-contestable monopoly and adequate disclosure and non-transparent pricing process should be established with full public disclosure of NSW utility street lighting pricing, financial models and underlying assumptions.

Finally, many thousands of energy inefficient lights continue to be installed despite repeated calls by Councils for the deployment of energy efficient alternatives (ie; LED or equivalent). WSROC with support from nine Western Sydney Councils have undertaken the 'Western Sydney - Light Years Ahead' project. The project will replace 13,000 high emission mercury vapour street lights with low emission LED (or equivalent) lights. Council seeks the Substantive Regulatory Proposal review does not restrict the progress of this project particularly in the areas of restrictions and additional costs imposed by Endeavour Energy on installation, maintenance and replacement of the light fittings.

Should you require further information, please contact Council's Manager Technical Services, Mr Zulfi Khan on 9840 9875.

Yours sincerely

Clr Nasr Kafrouni
MAYOR

a place for everyone