

Date: 14th April 2014

Mr Chris Pattas  
General Manager - Networks Branch  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001

VICelectricity2016@aer.gov.au

**Citipower distribution determination - request for new framework and approach**

Dear Mr Pattas,

LED Innovations Pty Ltd welcomes the opportunity to provide a submission on whether there needs to be a new framework and approach for the Citipower distribution determination.

We represent Eaton’s Cooper Lighting Business in Australia who are a very large global business and leading lighting supplier in many countries including those in North and South America and the Middle East. We believe that the complexity associated with the Victorian Public Lighting market is unlike any other country in which Cooper Lighting operate, particularly in terms of the lighting approvals process.

Our company is offering leading edge LED street lighting products to the Australian market that are being well received around the country with considerable interest amongst many local Councils in Victoria.

We are experiencing substantial difficulty in trading within Citipower’s region because potential customers that want to purchase and install our LED street lighting products cannot do so until after Citipower subject the products and the manufacturer to a long and arduous process just to get a simple light fitting approved for installation on their network. LED street lighting products are generally superseded by the time Citipower finalise their approvals process.

We believe that there needs to be a revision to Citipower’s framework and approach. The rate of technological change in the LED street lighting market will continue to place increasing pressure on the current business model.

We would welcome the opportunity to provide more detailed information should you require.

Regards

Ed Darmanin

Managing Director

LED Innovations Pty Ltd