

“NSW Roads and Maritime Services (RMS) welcomes the opportunity to comment on the public lighting aspects of the three DNSP’s Regulatory Proposal 2019 – 24.

Provision of effective public lighting is vital public safety function that is normally the responsibility of councils but one in which RMS, as the primary NSW road safety authority, also has a jurisdictional interest. This is particularly the case on designated traffic routes which are vital road corridors across the state and also, locations where road safety risks are most acute because of the higher speeds and traffic volumes.

In the context of this pricing review, RMS has a jurisdictional interest in road lighting in the following two categories:

1. Lights for which RMS directly pays Ausgrid, Endeavour Energy and Essential Energy capital, maintenance and energy charges via utility accounts under a variety of different tariff categories; and
2. Lights on public roads for which RMS provides a subsidy to NSW councils. These are primarily lights on major traffic routes and are typically lighting category V1-V5 lights. These lights are generally installed, owned and maintained by Ausgrid, Endeavour Energy and Essential Energy for councils and councils pay the utilities the associated capital costs, maintenance costs and electricity costs. RMS pays broadly 50% of these costs to councils under the Traffic Route Lighting Subsidy Scheme (TRLSS). There are approximately 100,000 such lights in NSW that are eligible for this subsidy and hence RMS has a strong interest in the outcomes of these pricing reviews.

RMS is of the view that LED lighting now has a demonstrably lower total cost than all legacy lighting types. The AER, in seeking to meet the National Electricity Objective, should not therefore be considering pricing proposals from the DNSPs for non-LED lighting for the forthcoming 2019-2024 regulatory period as this would not be in the long-term interests of councils or RMS as the public lighting customers in NSW.

RMS notes that the last major utility road lighting tender; the joint Networks NSW tender of 2014-15, was staged quite some time ago and only sought trial volumes of LEDs for main roads. LED pricing and technology as well as associated smart controls technology has moved on markedly since that time. RMS welcomes moves by Ausgrid, Endeavour Energy and Essential energy to transition to LEDs and would be pleased to work with all three and the AER to ensure good quality LED offerings for all classes of NSW main roads are available and agreed as standard default by the start of the next regulatory period on 1 July 2019.

Roads and Maritime Services”