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10<sup>th</sup> June 2010.

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

**Re: Comments – Draft Decision**  
**Victorian electricity distribution network service providers**  
**Distribution determination 2011 - 2015**

Dear Chris,

The issue I wish to raise is the absence and exclusion from Public Lighting charges of the following approved lighting services -

- CFL\* 1x32 watt
- CFL\* 1x42 watt.

(Refer section 19.10.3, page 824.....tables 19.46 to and including tables 19.51)

Both lighting services have the following approvals and assurances –

1. On the AEMO (formerly NEMMCO) load table
2. Approved by VSPLAG (Victorian Sustainable Public Lighting Action Group) Feb 2009<sup>1</sup>
3. Approved by Powercor / Citipower
4. Approved by Jemena / United Energy
5. Approved by SP Ausnet

Elsewhere around Australia, they are approved and included on the AER draft determination -

1. Country Energy – 42w
2. Integral Energy – 42w
3. Energy Australia – 42w

The following make no specific reference to either CFL or its competitive product group, T5<sup>^</sup> 2x14w & 2x24w T5<sup>^</sup>.

1. ActewAGL
2. Ergon Energy
3. Energex

Aurora Energy Tasmania, have approved and offer the CFL 42w.

ETSA South Australia, have indicated their intention to offer both CFL 32w & CFL 42w.

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I understand that the individual Victorian DNSPs (Distribution Network Service Providers) have tariffs for both CFL options **based on the AER model**, so this information for use by Councils is available.

It is entirely up to the individual DNSP to submit tariffs for the CFL options to the AER, and I respect their decisions.

They do in fact have published, Commercial Tariffs on their websites available to Councils.

On behalf of Sylvania Lighting, our concern in Victoria is that Councils seek reassurance of tariffs by referring to AER regulated rates for lighting services; including product.

Even though the Commercial rates of the CFL are, in most cases less than those of the T5, Councils appear to be seeking certainty via the AER.

If the AER chooses not to include CFL 32 watt and CFL 42 watt in their Lighting Services - Distribution Determination 2011 – 2015, could they at least reassure the Councils by including in the document notice to the effect that –

***....."DNSPs have available rates for both the CFL 32 watt and CFL 42watt for years 2011 to and including 2015 in accordance with the AER model. Third parties not satisfied with these rates/tariffs following negotiations are invited to submit their concerns in writing to the AER...."***

In summary, this generation of "energy efficient" lighting for Victorian Minor roads (Category P), is available in 2 approved options – T5<sup>^</sup> and CFL\*.

Having one without the other is not in the spirit of competition.

I ask you to consider including both, or neither on this document moving forward.

Sincerely

David Hickey  
Contracts Manager

- \* CFL = Compact Fluorescent Lamp
- <sup>^</sup> T5 = Linear Fluorescent Tube 550mm x 16mm diameter
- <sup>1</sup> VSPLAG Final Report Feb 2009

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