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9th June 2015

Mr Sebastian Roberts
General Manager, Network Regulation
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Dear Mr Roberts

Re: AER's preliminary determination on SA Power Networks' revenue proposal submission for the 2015-2020 regulatory control period

I am writing on behalf of the 'Reference Group for Vegetation Management Near Powerlines' in South Australia, in relation to the AER's preliminary determination on SA Power Networks' revenue proposal submission for the 2015-2020 regulatory control period and the decision to reject funding for the vegetation management initiatives.

We remain very disappointed to hear of the AER's preliminary decision provided on 30 April 2015 to not approve any additional funds for vegetation management improvement initiatives, despite the solid support of stakeholders and customers for this desired approach as a critical 'next-steps' approach.

Tree trimming around powerlines has been an ongoing concern for Councils and the community across South Australia. SA Power Networks have been consulting with stakeholders over the last 2 years to understand their expectations in relation to vegetation management near powerlines and their vision for necessary changes.

The 'Reference Group for Vegetation Management Near Powerlines' was established to provide expert arboriculture and horticultural input into the development of SA Power Networks' long-term vegetation management strategy and associated initiatives. The group is represented by TREENET, the Botanic Gardens of South Australia, Arboriculture Australia, SA Society of Arboriculture, Trees for Life, the South Australia Tree Advisory Board and Local Government, as well as expert individuals and a community/ landholder representative. The Reference Group emerged from the early consultation and has been actively involved in developing strategies and initiatives to develop a more sustainable approach and improve how vegetation near powerlines is managed over the long- term.

Funding for vegetation management initiatives, including tree removal and replacement, a move from a three to a two year cycle and advanced tree trimming techniques, is an essential requirement towards improving how vegetation near powerlines is managed, improving the visual outcome and enabling collaborative approaches and partnerships to be developed with key stakeholders and further reduction of fire risk.

Whilst as a group we understand that Councils could fund some of these initiatives, in reality Councils have limited resources and manage a significant number of street trees and reserves. There are opportunities however for SA Power Networks to enter into partnerships and cost sharing arrangements with Councils for vegetation management.

The 'Reference Group for Vegetation Management Near Powerlines' has been working closely with SA Power Networks since its establishment in February 2014 and is supportive of the SA Power Networks ongoing commitment to improving vegetation management outcomes and customer satisfaction. Without funding for the vegetation management initiatives we are concerned that the better outcomes supported by the community will be difficult to achieve and community and Council concerns regarding tree health, visual amenity and the severity of cutting will continue to be an issue.

We look forward to a more favourable consideration of SA Power Networks revised proposal for vegetation management which reflects community, stakeholder and Council expectations for managing vegetation near powerlines.

If you have any further queries please contact me directly on 0448 599 955 or 8313 7078 or glenn@treenet.org

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Glenn Williams', is written over a light blue circular stamp.

Glenn Williams, Director TREENET

(on behalf of the Reference Group for Vegetation Management Near Powerlines)