

AER draft supplementary decision on public lighting

I refer to the above matter, and provide comments below on one issue that appears to have not been canvassed in the draft determination.

The draft decision recommends a number of changes to the individual schedule of prices for the various lamp types, however it is unclear if energy efficiency issues has been included into the schedule of rates.

It is therefore recommended that as part of the fixing of these prices that consideration should be given to ensuring that the energy efficient lighting is not priced out as a viable option for upgrading or selecting less efficient lamp types. In this regard, consideration could be given for providing an incentive pricing schedule that encourages the early replacement of older lamp types, in view of the wider community and environmental benefit attached to reducing the growth in energy demand, and consequent costs involved in upgrading generating, transmission and distribution infrastructure.

It is noted that the proposed Rate 1 for the T5 twin 14 lamp has been reduced and the equivalent 80w MV rate has been increased, however the price differential on these light types is still large. It is further noted in particular that the T5 Rate 2 has increased, and is recommended to have a higher rate than the considerably less efficient 80wMV, which would be considered a disincentive to selecting the preferred energy efficient lamp.

The Regulator's consideration of this issue would be greatly appreciated. If you require any further information, please do not hesitate to contact me.

Regards

Dick Webb  
Manager Technical Services  
Campbelltown City Council