

72 Woodville Road, Woodville
South Australia 5011
PO Box 1, Woodville SA 5011

T 08 8408 1111
F 08 8408 1122
charlessturt.sa.gov.au



15 May 2019

Mr Warwick Anderson
General Manager Networks, Finance and Reporting
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601

BY EMAIL: SAPN2020@aer.gov.au

Dear Mr Anderson

SA Power Networks Electricity Distribution Price Review For 2020/21 – 2024/25: Public Lighting

The City of Charles Sturt welcomes the opportunity to make a submission in relation to the SA Power Networks (SAPN) Electricity Distribution Price Review 2020/21-2024/25 for public lighting. Council would like to acknowledge the important role the Australian Energy Regulator (AER) plays in providing a fair and transparent process for pricing determinations around public lighting.

Since late 2018, representatives from the City of Charles Sturt have participated in a Public Lighting Working Group (Working Group), formed to facilitate a practical and representative interface between SAPN and South Australian public lighting customers, including councils and the SA Government's Department of Planning Transport and Infrastructure (DPTI). The working group was established as a representative body for negotiating issues under the current regulatory framework and facilitating the practical transition to the new AER regulatory framework commencing in July 2020.

The Working Group is coordinated and chaired by the Local Government Association of South Australia (LGA) and is comprised of representatives of the City of Charles Sturt, City of Holdfast Bay, City of Mitcham, Mount Barker District Council, City of Mount Gambier, City of Norwood Payneham and St Peters, City of Onkaparinga, City of Port Lincoln, City of Prospect and City of West Torrens.

The introduction of the Working Group has resulted in a marked improvement in the relationship and level of communication between SAPN and the Local Government sector. The information provided through the Working Group has enabled councils to have a broader understanding of public lighting services and the ability to provide informed input into the new regulatory framework.

The City of Charles Sturt has had the opportunity to provide input into the LGA's submission to the SAPN Electricity Distribution Price Review 2020/21-2024/25 for public lighting, developed by consultancy firm Ironbark Sustainability with input from the Local Government representatives of the Working Group.

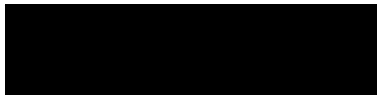


The City of Charles Sturt supports the submission prepared by the Local Government Association of South Australia (LGA).

Council looks forward to continuing to work with the Public Lighting Working Group, SAPN and the AER during the price review period. We value the contribution that the AER has made in supporting the delivery of equitable and consistent approaches to public lighting pricing in South Australia.

Thank you for the opportunity to make this submission. Further enquiries can be forwarded to myself or [REDACTED], Project Manager Lighting [REDACTED].

Yours sincerely

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Paul Sutton
Chief Executive Officer