



[holdfast.sa.gov.au](http://holdfast.sa.gov.au)

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13 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](mailto:SAPN2020@aer.gov.au)**

Dear Mr Anderson,

**Re: SA Power Networks - Electricity Distribution Price Review for 2020/21 to 2024/25 - Public Lighting**

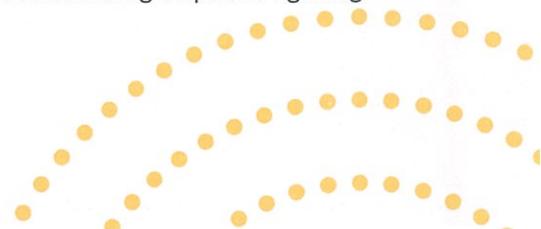
The City of Holdfast Bay welcomes the opportunity to make a submission in relation to the SA Power Networks (SAPN) Electricity Distribution Price Review 2020/21-2024/25 for public lighting. Council would like to acknowledge the important role the Australian Energy Regulator (AER) plays in providing fair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

Council is located on the eastern coastline of Adelaide and has a population of around 36,000 residents. Our City is a major commercial and tourism destination in Adelaide, with two major commercial shopping strips at Glenelg and Brighton; and over 8 km of highly popular beaches. Efficient and cost effective public lighting is a key feature of our tourism and commercial offerings. To this end Council has recently invested \$1.2m in upgrading much of its public lighting to more efficient LEDs under the SAPN's PLC LED tariff arrangements. Council is therefore seeking a continuation of cost effective tariffs from SAPN.

Since late 2018, representatives from City of Holdfast Bay have been participating 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). It was established as a representative body for negotiating issues under the current regulatory framework and facilitating the practical transition to the new 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 Cities of Holdfast Bay, Charles Sturt, Mitcham, Mount Gambier, Norwood Payneham and St Peters, Onkaparinga, Port Lincoln, Prospect and West Torrens together with the District Council of Mount Barker.

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 input into future processes.



The City of Holdfast Bay 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 with the assistance of street lighting experts and local government representatives.

**The City of Holdfast Bay supports the submission prepared by the Local Government Association of South Australia (LGA).**

We look forward to continuing to work with the Working Group, SAPN and the AER during the price review period and value the contribution that the AER has made in determining that equitable and consistent approaches are made to pricing which represent the best value proposition for the community, industry and all levels of government.

Thank you for the opportunity to make this submission. Further enquiries can be forwarded to myself or [REDACTED], General Manager City Assets and Services on [REDACTED] or email [REDACTED]

Yours sincerely,

A black rectangular redaction box covering the signature of Roberto Bria.

Roberto Bria  
A/Chief Executive Officer

