

GCC File: AER / HCC-GCC Street Light Project
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19 March 2015

Mr Chris Pattas
General Manager, Networks
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3000

Dear Mr Pattas

Tasmanian Electricity Distribution, 2017 – 2022 Framework and Approach

I am writing to you in response to the AER's invitation for submissions regarding the Framework and Approach for the next regulatory control period for Tasmania's electricity distribution network service provider, TasNetworks.

This submission is made with particular reference to public street lighting. Glenorchy City Council pays approximately \$1.1 million annually for street lighting and is interested in opportunities to adopt new technologies and to investigate alternative ownership / maintenance arrangements to reduce costs.

The current classification of public lighting services as Direct Control / Alternative Control allows little scope for exploring different models of ownership and maintenance, whereas a Negotiated Distribution Service classification would allow greater scope for innovation in this area. Given the recent advances in LED technology, Council believes there needs to be flexibility to negotiate directly with the Distributor on levels of service and cost.

Glenorchy Council, together with Hobart City Council, are involved in a Federally funded project to replace most, if not all, of the 80 watt mercury vapour lights within these municipalities, with 18 watt LED lights. Being a "new public lighting technology" these are being discussed as a Negotiated Distribution Service. We would prefer to have the same options open to us, that this classification affords, to the other unmetered street lights in our area.

Accordingly a review of the Framework and Approach is supported, so that the potential benefits of alternative models for service delivery and cost are considered.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Grierson', with a long horizontal flourish extending to the right.

Russell Grierson

Manager Infrastructure & Engineering Services