

From: Peter McMurray [mailto:pmcmurray@lakemac.nsw.gov.au]
Sent: Thursday, 19 February 2015 12:20 PM
To: NSWACTelectricity
Cc: Graham Mawer; Ben Maddox
Subject: SSROC Submission on Ausgrid Public Lighting Pricing Proposal 2014-19

Dear Sir/Madam

SSROC has made the attached submission to the Australian Energy Regulator about Ausgrid's proposed 2015-19 street lighting pricing. While much about Ausgrid's proposal remains hidden by inappropriate confidentiality claims, the SSROC SLI Program has identified several clear bases on which to challenge its claim for a substantial price increase including that:

- 1) Ausgrid's assumed lighting failure rates appear to be 51% higher than the actual failure rates reported in its annual reports in recent years; and
- 2) Ausgrid's proposed 2015/16 charges for the three most common lighting types appear to be 58-59% higher than the average 2015 charges for the same lights across the five Victorian electricity distributors.

There is also a substantive case for reviewing the claimed value of the lights, a need to explicitly tie pricing to service levels, expand reporting requirements, for revising pricing once the Networks NSW lighting tender is complete and to address a number of other items. It was unfortunately not possible to provide this submission to councils sooner as it incorporates some new information only released to SSROC by the AER in the last 48 hours.

Lake Macquarie City Council agrees with the position taken and confirms its support for this SSROC submission.

Please contact me should you require any further information.

Regards

Peter

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