

31 July 2024

Renate Vogt
General Manager Regulation
CitPower Powercor United Energy
Level 1/40 Market St
Melbourne VIC 3000

Submitted via: community@powercor.com.au, community@ue.com.au

Dear Sir/Madam,

Re: CitPower, Powercor and United Energy Public Lighting Consultation Paper

On behalf of our 69 council members, the Victorian Greenhouse Alliances (VGA) are pleased to provide this response to the *consultation paper*. The VGA are formal partnerships of local governments and statutory agencies driving climate change action across Victoria's municipalities. The VGA deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building and regional partnerships.

We welcome the proposal to replace old inefficient public lights with LEDs in the next regulatory period. We urge you to consider the following recommendations in your approach to the 2026-31 Electricity Distribution Price Review (EDPR):

- Consult closely with AusNet Services regarding their approach to replacing mercury vapour lamps in partnership with councils during the current 2021-26 EDPR period. AusNet have confirmed that they are willing to share their learnings and meet directly with other distributors regarding their experience. Please contact Justin Betlehem on 0433 691 111 or justin.betlehem@ausnetservices.com.au to arrange a meeting at a suitable time.
- Avoid a protracted negotiation between councils and the Australian Energy Regulator (AER) by adopting an equitable funding model that does not penalise councils who have already funded upgrades of their public lighting assets. A summary of the 2020 negotiation process between AusNet, councils and the AER is provided in Attachment 1.
- Include other light types (such as high-pressure sodium lamps) through an equitable, coordinated bulk replacement program. This approach should flexibly allow for councils to elect to lead the procurement of materials (estimated to be 25% cheaper) and project management services in the relevant network areas. We do not support the current proposed approach to transition high pressure sodium lights at the end of serviceable life.
- Review and approve, as a standard lighting option, 2700K/70 CRI products that are compliant with Australian Standards, thus expanding lighting palettes to include wildlife-sensitive lighting options; and engage with councils and the Department of Transport and Planning with a view to increasing the adoption of wildlife sensitive lighting fixtures across network areas and including features such as low colour temperature, timers, dimmers, sensors and shielding.
- Ensure that the savings generated by the roll-out of the Central Management System (CMS) and smart cells are immediately captured by councils via agreed changes to consumption calculations for unmetered public lights. We also urge the distributor to commit to the work to have the system approved for Type 9 metering. This approach should include the provision of APIs to councils and other relevant third parties to allow for integration of other smart city



systems and Internet of Things (IoT) platforms. We would welcome the opportunity to work with you throughout the next regulatory period to trial new network tariffs to support the CMS roll-out.

- Consult further with councils regarding the proposed transition of legacy lighting schemes in non-trafficable parks, gardens and laneways back to council management and control. We do not have a clear position on this proposal and will seek to survey councils on this issue (and other issues, such as solar power lights) over the coming months. We will happily share the findings of this survey work proceeding the submission of formal pricing proposals to the AER in January 2025.

We would welcome the opportunity to speak with you directly regarding this submission and how we can leverage the respective capabilities and resources of councils to ensure the best outcomes for Victorian communities.

Greenhouse Alliances and contacts

- Barwon South-West Climate Alliance (BSWCA), Sue Phillips, Executive Officer, sue.phillips@bswca.org
 - o City of Greater Geelong
 - o Golden Plains Shire
 - o Surf Coast Shire
 - o Borough of Queenscliffe
 - o Colac Otway Shire
 - o Warrnambool City Council
- Central Victorian Greenhouse Alliance (CVGA), Annika Kearton, Chief Executive Officer, ceo@cvga.org.au
 - o Ararat Rural City Council
 - o Ballarat City Council
 - o Buloke Shire Council
 - o Central Goldfields Shire Council
 - o Gannawarra Shire Council
 - o Greater Bendigo City Council
 - o Hepburn Shire Council
 - o Loddon Shire Council
 - o Macedon Ranges Shire Council
 - o Mildura Rural City Council
 - o Mount Alexander Shire Council
 - o Pyrenees Shire Council
 - o Swan Hill Rural City Council
- Eastern Alliance for Greenhouse Action (EAGA), Scott McKenry, Executive Officer, scott.mckenry@maroondah.vic.gov.au
 - o City of Boroondara
 - o Glen Eira City Council
 - o City of Knox
 - o Maroondah City Council
 - o Monash City Council
 - o Stonnington City Council
 - o Whitehorse City Council
 - o Yarra Ranges Council
- Gippsland Alliance for Climate Action (GACA), Tiffany Harrison, Coordinator, tiffany.harrison@gccn.org.au



- o Baw Baw Shire Council
 - o East Gippsland Shire Council
 - o Latrobe City Council
 - o South Gippsland Shire Council
 - o Wellington Shire Council
- Goulburn Murray Climate Alliance (GMCA), Carole Hammond, Executive Officer, eo@gmca.org.au
 - o Alpine Shire Council
 - o Benalla Rural City Council
 - o Campaspe Shire Council
 - o Greater Shepparton City Council
 - o Indigo Shire Council
 - o Mansfield Shire Council
 - o Mitchell Shire Council
 - o Moira Shire Council
 - o Murrindindi Shire Council
 - o Towong Shire Council
 - o Strathbogie Shire Council
 - o Wangaratta Rural City Council
 - o Wodonga City Council
 - o Alpine Resorts Victoria
 - o Goulburn Broken Catchment Management Authority
 - o North East Catchment Management Authority
 - Northern Alliance for Greenhouse Action (NAGA), Dean Thompson, Executive Officer, dean@naga.org.au
 - o Banyule City Council
 - o City of Darebin
 - o Hume City Council
 - o Manningham City Council
 - o City of Melbourne
 - o Merri-bek City Council
 - o Nillumbik Shire Council
 - o City of Whittlesea
 - o City of Yarra
 - South East Councils Climate Change Alliance (SECCCA), Helen Steel, Chief Executive Officer, hsteel@seccca.org.au
 - o Bass Coast Shire Council
 - o Bayside City Council
 - o Cardinia Shire Council
 - o City of Casey
 - o Greater Dandenong City Council
 - o Mornington Peninsula Shire Council
 - o City of Kingston
 - o City of Port Phillip
 - Western Alliance for Greenhouse Action (WAGA) Fran MacDonald, Executive Officer, franm@brimbank.vic.gov.au
 - o Brimbank City Council
 - o Maribyrnong City Council
 - o Hobsons Bay City Council
 - o Melton City Council
 - o Moonee Valley City Council



- o Moorabool Shire Council
- o Wyndham City Council

This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.

