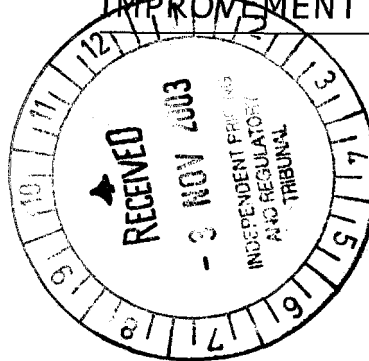


STREET LIGHTING IMPROVEMENT PROGRAM

31 October 2003

Dr. T. Parry, Chairman
Independent Pricing and Regulatory Tribunal
PO Box Q290
QVB Post Office NSW 1230



Dear Dr. Parry,

RE: Review into Guaranteed Customer Service Standards and Operating Statistics - Draft Recommendations

Thank you for the opportunity to comment on the draft GCSS recommendations. The Street Lighting Improvement Program welcomes this opportunity to provide further input on behalf of the twenty three participating councils, particularly with reference to the treatment of street lighting services supplied by EnergyAustralia. Participating councils represent approximately 165,000 street lights (about 1/3 of all those in NSW).

Our comments on the Draft Recommendations are as follows:

- 1) **Councils Would Welcome a Maximum Repair Time of 5 Days or Less** – Councils will welcome a maximum repair time for outages at 5 days or less for the general population of street lights (Section 4.1.5). However, as noted in the Draft Recommendations, situations creating heightened public safety hazards warrant a more stringent requirement. This should be no more than 1-2 days, given the community safety issues involved. These situations include:
 - outages involving blocks of contiguous lights; and
 - outages involving pedestrian crossings.
- 2) **Main Roads Need Separate GCSS Mechanism** – While councils will welcome a strengthening of the GCSS mechanism pertaining to maximum repair time, we note that the mechanism proposed would only be effective in dealing with outages on residential roads.

Simply put, there are no residents on most main roads who would have a self-interest in reporting outages. The surveys conducted by the Street Lighting Improvement Program in 2002 and again in 2003 support this position. These surveys suggest that the highest levels of outages are to be found on main roads and in many areas, these are at or exceed the maximum permissible levels of 5% suggested by the relevant Australian Standard (AS1158).

would be to extend the GCSS payment to councils reporting outages. The council, as the street lighting customer, should be able report an outage and be compensated if not repaired within a reasonable time.

More broadly, we note that the abutting resident is NOT the street lighting customer whether on main roads or residential roads. Street lighting is designed to provide lighting to through traffic while NOT unduly intruding on abutting resident's properties. Indeed, we note the recent strengthening of the relevant Australian Standard to keep obtrusive light off abutting properties whenever possible.

The council is the street lighting customer on behalf of the community using those streets. Given that they have been entrusted with the responsibility to provide street lighting in NSW, councils should be given tools to ensure that it is provided to a reasonable minimum standard.

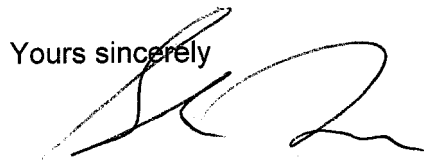
- 3) **NSW Public Lighting Code Essential** - In our previous submissions, the Program noted the critical need for a NSW Public Lighting Code because street lighting is an essential service for the community with important safety, security and amenity aspects. Street lighting needs to be provided and maintained to a reasonable standard and with appropriate levels of public accountability.

NSW councils will welcome IPART's proposal to tighten repair times on outages under a GCSS mechanism, but this is but one narrow aspect of managing these essential community assets. Lights that are not appropriately selected, installed and maintained can be just as ineffective and dangerous as an outage. The evidence collected by the Program strongly suggests that a broader set of minimum service standards is required to redress current deficiencies.

I hope that the issues raised in this submission provide useful input to the current process and more broadly to the upcoming deliberations on the 2004 Electricity Distribution Determination. We would be delighted to work together with IPART to this end, and look forward to doing so.

I would be pleased to answer any questions you have related to the matters raised in this submission.

Yours sincerely



Graham Mawer
Program Manager

Cc: Warren Taylor – Local Government Association of NSW