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23 April 2020

Mrs Rowan McKeown  
Essential Services Commission of South Australia  
GPO Box 2605  
ADELAIDE SA 5001

**Submitted Online:** <https://www.escosa.sa.gov.au/>

Dear Mrs McKeown,

### **SA Power Networks 2020 Reliability Standards Review**

The Local Government Association of South Australian (LGA) welcomes the opportunity to make a submission in relation to the SA Power Networks (SAPN) 2020 Reliability Standards Review. This response has been developed in conjunction with street lighting experts Ironbark Sustainability and informed by discussions from the local government representatives of the Public Lighting Working Group (PLWG).

This submission focuses on the street light fault repair GSL payment. This is not a comprehensive review of all elements of the review. Lack of comment on other elements of the proposed reforms does not imply LGA support for those elements. LGA member councils may also have made their own submissions, which should be considered separately and in addition to this response.

### **The Local Government Association of South Australia (LGA)**

The LGA is recognised as the peak representative body for local government in this State and prides itself on being the voice of local government. The LGA provides leadership to councils and representation outwards to State and Federal governments and other key stakeholders.

The LGA is federated nationally with interstate and territory associations in the Australian Local Government Association (ALGA). The LGA is also supported by the Parliament of South Australia in Schedule 1 to the Local Government Act 1999.

The mission of the LGA is to provide leadership to councils for the benefit of the South Australian community. To achieve this mission the Association has set itself three key initiatives areas:

- Leadership and advocacy: Achieving greater influence for local government in matters affecting councils and communities.
- Capacity building and sustainability: Working with member councils to build capacity and increase.
- Best practice and continuous improvement: Facilitating continuous improvement in councils and the LGA.

## Questions for Stakeholders: GSL Payments

The following question has been proposed for stakeholders:

*What is your view on whether SA Power Networks' Public Lighting Service Framework changes the importance of the street light fault repair GSL payment? Do you support the Commission's position to retain the street light fault repair GSL payment?*

Since late 2018, the LGA has led a Public Lighting Working Group (PLWG), formed to facilitate a practical and representative interface between SA Power Networks 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 PLWG is comprised of several South Australian metropolitan and regional local government councils including the City of Charles Sturt, City of Holdfast Bay, City of Mitcham, Mount Barker District Council, City of Mount Gambier, City of Norwood Payneham and St Peters, City of Onkaparinga, City of Port Lincoln, City of Prospect and City of West Torrens, the SA Government's Department of Planning Transport and Infrastructure (DPTI) and expert consultants from Ironbark Sustainability. It is coordinated and chaired by the LGA.

The introduction of the PLWG has resulted in a marked improvement in the relationship and level of communication between SA Power Networks and the local government sector. The information provided through the PLWG has enabled councils to have a broader understanding of public lighting services and the ability to provide input into future processes.

The PLWG have been actively involved in the development of SA Power Networks' Public Lighting Service Framework (available at [https://www.talkingpower.com.au/public-lighting/news\\_feed/public-lighting-service-framework](https://www.talkingpower.com.au/public-lighting/news_feed/public-lighting-service-framework)), outlining the levels of service SA Power Networks aims to deliver to public lighting customers and detailing the responsibilities of SA Power Networks and public lighting customers in the delivery of public lighting services.

The Public Lighting Service Framework details the target levels of service to be delivered by SA Power Networks, this includes repairing 98% of public lighting faults within 5 business days (metro) or 10 business days (regional areas). This service level will be supported by the provision of operational reports, detailing fault performance, which will be provided to public lighting customers on a quarterly basis. This performance reporting provides a greater level of transparency around street light faults and repair times for public lighting customers, with the expectation that this will be reviewed regularly by the PLWG. This enables the direct conversations between PLWG members and SA Power Networks, to ensure that SA Power Networks is taking the necessary steps to deliver the service standards expected by public lighting customers.

Public lighting services have been classified as Alternative Control Services from 1 July 2020. As an alternative control service, public lighting customers will fund the provision of these services, including the reasonable provision of GSL payments.

The LGA are supportive of an amendment to South Australia's GSL scheme to reduce the incentive for individuals to report high volumes of street light faults, which results in higher costs for public lighting customers.

We note that there are GSL schemes in place for public lighting in other jurisdictions, where these schemes appear to operate effectively to maintain public lighting services without resulting in a financial burden on public lighting customers.

Thank you for the opportunity to make this submission. Further enquiries can be forwarded to myself or Alexi Lynch (Business Manager, Ironbark Sustainability) at [alexi@realaction.com.au](mailto:alexi@realaction.com.au)

Yours sincerely



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