

Ausgrid Comments

See below feedback from Ausgrid regarding the three main questions you have raised in the consultation paper. Both Endeavour and Essential also support these views.

1. The role of Customers in the selection of lights for the standard luminaire list

Ausgrid's position as the asset owner of public lighting infrastructure is that DNSP's bare the commercial and technical risk of this infrastructure. As such, DNSP's should be able to make the final decision as to whom we engage to supply materials that we ultimately own and operate. Supplier's responsibilities do not stop when the materials are delivered, technical support and the commercial backing to warrant products over their economic lives play a significant role in the selection process which may not be of relevance to the public lighting customer.

That said Ausgrid agrees that the technical specification should be consulted and agreed with public lighting customers and sourcing strategies consulted before tender processes are begun. Beyond that, the DNSP's procurement process should determine the products and suppliers whom the DNSP's procure from.

Therefore Ausgrid supports option B in the consultation paper. This would alleviate all of the issues that have been brought up in the feedback from customers as well as those mentioned during consultation.

2. Setting amended minimum service standards for the repair of light faults

NSW DNSP's had agreed that an 8 day average to repair street lights was appropriate except where there are site specific or underground issues in which case a 40 day average was being proposed. Ausgrid was unaware that maximum days were a consideration of councils as this has never been discussed in any previous consultation.

If a maximum target is being proposed and that target is less than the current average as well as being linked to licence conditions then this increases the risk associated with a breach considerably. In order to minimise the risk of a breach Ausgrid will need to increase resources that repair public lighting assets. This may or may not result in an increase in performance levels, but it will certainly increase the cost associated with the service and Ausgrid will factor this into pricing proposals. This would not be a good outcome for any party.

Ausgrid's distribution business is subject to feeder reliability standards. These standards are set by IPART and that document is attached to this submission for reference. There are two main metrics, overall feeder reliability and individual feeder reliability, with individual performance measures being greater than the overall. These are somewhat analogous to average and maximum days for street lighting repairs.

Ausgrid proposes that a variant of the feeder reliability and performance metrics be applied to street lighting repairs. Average days would be used for overall repair performance measures and these would be set at the initially proposed 8 and 40 day average timeframes. These would be reportable per council each financial year and abiding by these time frames would be a hard limit in terms of code breaches. These could also be used as the metric that determines penalties payable to individual councils which is currently proposed as 0.25% of the individual councils annual maintenance charges.

Maximum days for individual repairs would also be used and set at 12 and 60 days. Any repairs that exceed these targets would need to be reported to IPART on a quarterly basis with actions on what steps are to be taken to reduce these time frames. This metric would be used to determine the penalty that is payable to residents, similar to how the current code operates.

Ausgrid acknowledges that only having an average day target does not adequately address faults that exist for extended periods of time. This proposal will call out those problem areas and make them reportable to IPART. This proposal will also have little or no impact on current annual maintenance charges.

3. Determining the compensation for a service providers failure to meet the minimum service standards for the repair of light faults

Ausgrid does not support the idea that penalties should only be payable to councils. SSROC proposed that residents no longer receive a payment for street lights being out for longer than the agreed repair times and that instead council would receive these payments, however Ausgrid's position is that residents being the end user of the service and who ultimately pay for the service are entitled to receive a payment if the service is not received. Ausgrid's position is that if a councils overall reliability standards are not met within a financial year then this will incur a penalty of 0.25% of that council's annual maintenance charge. Residents who report faults and are adjacent to the reported light will be entitled to \$25 if the individual (maximum) target is not met.

This code being linked to licence conditions and enforced by IPART is a considerable incentive for DNSP's to comply and a considerable step forward from the existing PLC. This should be taken into consideration by the department in their final draft.