3 July 2017

Robert Fuller
Chief Executive Officer
Institute of Public Works Engineers Australasia
32 Walker Street
NORTH SYDNEY NSW 2060

Energy Networks Australia Response to Street Lighting and Smart Controls (SLSC) Draft Model Specifications for LED Street Lighting and Public Lighting Controls

Dear Mr Fuller,

I am writing to you in response to your email addressed to Energy Networks Australia, dated June 21st 2017, regarding the draft SLSC Roadmap Model Lighting Controls Specification.

Energy Networks Australia values being a part of the SLSC Council and welcomes the opportunity to provide feedback on the two draft specifications so far developed by IPWEA on behalf of the SLSC Council:

- Model Specification - Lighting (Draft); and
- Model Specification - Lighting Controls (Draft).

As you know, Energy Networks Australia is the national industry association representing the businesses operating Australia's electricity transmission and distribution and gas distribution networks. Our member businesses provide energy to virtually every household and business in Australia.

Energy Networks Australia and our members support the objectives of the Australian Government and the Council of Australian Governments (COAG), Energy Council's Equipment Energy Efficiency (E3) Program, in supporting the aims of the SLSC Programme. As a key stakeholder, we remain committed to providing strategic, technical and policy guidance into this programme.

Energy Networks Australia recognises the potential energy efficiency benefits including longer asset lifecycles, maintenance efficiencies and environmental benefits available in utilising LED street lighting over older traditional technologies. Introduction of such technologies is typically occurring where benefits outweigh whole of asset life cost or where required quality of services can no longer be achieved using traditional means. As LED and smart control technologies mature, and as consumers needs change, greater and faster uptake is likely to occur.

Requirement for flexibility of approach

While Energy Networks Australia supports the efficient and timely deployment of new street lighting and smart control technology and the opportunities that the technology could provide for energy networks and consumers, we also remain committed to ensuring value for network customers through achieving efficient cost outcomes. Consequently, some flexibility is required for product or service specifications when considering and establishing investments in street lighting and controls on a case-by-case basis to prevent over capitalisation.

Energy Networks Australia recommends that IPWEA ensure that it is made clear within the model specifications that they are: non-binding; designed to be adapted to meet each user's needs; and

should be used to better inform stakeholders involved in procurement of LED lighting and control systems.

Feedback on model specifications

Feedback received from distribution network service providers (DNSPs) described both of the model specifications as being informative and provide a great starting point to share learnings from the collective wisdom of suppliers regarding details of readily available technological features and listing relevant standards. However, none of the DNSPs considered it appropriate to adopt the model specifications to replace their existing specifications.

The majority of DNSPs have existing mature LED lighting specifications, and in the case of New South Wales and Victoria, DNSPs share the same specifications within each jurisdiction to improve consistency of approach. These state-based specifications were developed over time in consultation with product suppliers and public lighting stakeholders and are aimed at delivering customers the value they seek in terms of safety, performance, and cost.

The public lighting controls market is considered by Energy Networks Australia members to be in its infancy, with technological capabilities rapidly evolving and costs falling. As such, there are concerns held by some DNSPs that an overly prescriptive technical specification applied at this time during a period of fast evolving technology and markets could result in poor financial outcomes for networks and their customers.

DNSP specifications typically separate commercial requirements from technical requirements, with the technical requirements based on establishing set parameters within the requisites outlined in current Australian Standards. This is done to clearly define and set the “fit for purpose” requirements.

Energy Networks DNSP members also identified that consideration should also be given to ensuring alignment of the model specifications with applicable regulations and standards. For example, a number of the features listed within the controls specification, such as dimming and more accurate monitoring of energy usage for billing purposes, are not currently permitted under the current standards. Furthermore, requirements listed within the LED lighting specification for colour temperatures also appear to differ from current Australian Standards.

A successful endeavour

While Energy Networks Australia members consider that the SLSC model specifications would most appropriately be applied as guidance or a basic template, DNSPs are committed to utilising the content of the model specifications once finalised to aid in any update of their current specifications, plus use them to assist in determining the best options for new brownfield and greenfield applications.

Energy Networks Australia considers that if the above feedback provided by member DNSPs in regard to the need for flexibility in how these model specifications are utilised, and that care is taken to ensure compliance with existing Australian Standards, then the purpose of these documents, as set out by the SLSC Council will be achieved.

Should you have any queries, please contact Stuart Johnston, Executive Director – Assets & Network Transformation on (02) 6272 1513 or sjohnston@energynetworks.com.au.

Yours sincerely,

John Bradley
Chief Executive Officer