

**Australian Energy Market Commission
Level 15
60 Castlereagh Street
Sydney NSW 2000**

Re ERC0346 Unlocking CER benefits through flexible trading

To whom it may concern,

Ironbark Sustainability broadly supports the IPWEA submission on Minor Energy Flow Metering (separate attachment). We agree that there is a strong case to make changes to the metering regime in the National Electricity Market that would recognise the metering data being produced by devices such as smart street lighting controls. We encourage both the AEMC and AEMO to make changes in this area that would introduce a straightforward and cost-effective approach to the metering of street lighting and other similar devices in the public domain.

In addition to the IPWEA submission we would like to provide the following feedback on the proposed change:

- The IPWEA submission makes reference to 30% additional energy savings arising from the implementation of dimming, trimming and constant light output. Based on actual smart street lighting projects completed in Australia that have implemented/designed dimming, trimming and constant light output, we would expect an average of 40% additional energy savings (additional to that achieved by the basic switch to LED lighting).
- The IPWEA submission does not provide an estimate for savings associated with improved road safety benefits of smart street lighting. Our calculations indicate a 20 year benefit per light of between \$1,000 and \$4,000 in relation to improved road safety outcomes (as a result of improved maintenance and reduced traffic accidents).



- The IPWEA submission has, for modelling purposes, assumed “a common regime of dimming by 50% for 50% of the night hours” when estimating the cost benefits of dimming. We understand that this is modelling - but this approach would not meet Australian Standards and is likely to lead to increased road safety issues - impacting on the benefits identified elsewhere in the submission. Dimming is a real option to reduce energy consumption, but should be implemented in accordance with road safety design. When implemented in accordance with road safety design, our practical experience suggests 10-20% energy savings from dimming, 8-10% energy savings from constant light output, and 10-20% energy savings from trimming.
- The IPWEA submission refers to the following types of street furniture to which Minor Energy Flow Metering may apply:
 - Bus shelters
 - Cameras (and increasingly other types of smart city devices)
 - Traffic signals and illuminated signage
 - Public barbecues
 - Various telecommunications devices

The following street furniture should also be considered:

- Waste bins
- Car parking terminals/sensors

Kind regards
Ross McKirdy
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