



Your ref **ERC0346**
Enquiries Noel Peters

Department of
Transport and Main Roads

16 February 2023

ATTN: Jessica Curtis – Project Leader
Australian Energy Markets Commission
Level 15 – 60 Castlereagh Street
Sydney NSW 2000

Dear Ms Curtis,

**Unlocking CER benefits through flexible trading
IPWEA Submission on Minor Energy Flow Metering**

This submission is made on behalf of the Queensland Government's Department of Transport and Main Roads (TMR). The Department plans, manages and delivers Queensland's integrated transport environment for road, rail, air and sea.

In the Department's role as the main road authority for Queensland, it is responsible for a network of more than 34,000 km of National, State Strategic, Regional and District roads. In this role, we have jurisdictional responsibility for both the efficient movement of vehicles and for road safety.

As with all road authorities, road lighting is an important road safety measure for the Department. It is in this context that I am writing to confirm the Department's support for the IPWEA submission on Minor Energy Flow Metering. I also note the Department's previous submission on this topic of October 2021 which remains relevant and valid.

We agree with IPWEA that there is a compelling case for reform of the metering regime in the National Electricity Market that would recognise the metering capabilities of devices such as smart road lighting controls (e.g., under a Minor Energy Flow Metering regime).

I note that the Department both directly owns and manages some 35,000 unmetered street lights (e.g., Rate 3) and pays Energy Queensland for a further 30,000 unmetered street lights (e.g., Rate 1 and Rate 2) that they own and manage on behalf of the Department. Reform in this area therefore needs to accommodate a range of ownership scenarios including both DNSP-owned and customer-owned lighting. As IPWEA has noted, reforms also need to be simple and cost-effective so as to encourage widespread adoption.

The Department is in the midst of major smart road lighting controls deployment across its Rate 3 assets and, in conjunction with our supplier, I would be pleased to offer both the AEMC and AEMO an online demonstration of the road lighting management system that we are using to manage these lights.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NP', written in a cursive style.

Noel Peters
A/Deputy Chief Engineer (Traffic Engineering Technology and Systems)