



14 September 2023

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

Dear Lisa,

**RE: Unlocking CER benefits through flexible trading (REF ERC0346)  
SSROC Submission on Minor Energy Flow Metering**

Thank you for the opportunity to comment on the future framework for metering services in the National Electricity Market and, in particular, the proposal to adopt a Minor Energy Flow Metering regime.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of twelve local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.7 million, one third of the population of Sydney. SSROC seeks to advocate for the needs of our member councils and bring our regional perspective to the issues raised.

SSROC Street Lighting Improvement (SLI) Program covers a wider footprint than our members. A total of 29 councils in metropolitan Sydney, the Central Coast and Hunter, work closely together to improve the provision of street lighting services for which they are responsible. That service is mainly provided by Ausgrid to the councils. The councils have sought to work together with Ausgrid through the SLI Program for two decades, covering a range of pricing, technology and service-related issues. The councils participating in the program collectively encompass over 230,000 street lights or more than 90% of Ausgrid's lighting and more than 10% of the street lights in the National Electricity Market.

As per our submission in February, SSROC's SLI Program has been closely tracking international developments with smart street lighting controls for more than seven years. SSROC has also worked with Ausgrid in staging initial smart controls trials and in a more recent public tender awarded earlier this year.

Based on this work, SSROC believes that it is strongly in councils' interests that they be able to adopt smart street lighting controls to secure a range of energy savings, GHG abatement, maintenance, service-level improvements, safety and many other benefits that this technology offers. However, we are also aware that dimming street lighting in the off-peak (as is now done widely around the world) and several other benefits available with smart street lighting controls entail variable energy consumption and therefore do not fit well under the existing Type 7 metering approach to unmetered loads.

SSROC and Ausgrid last year agreed on a deployment of smart controls involving at least 62,000 street lights on main roads. The councils served by Ausgrid subsequently accepted a formal Ausgrid proposal and Ausgrid has recently commenced deployment in conjunction with LED upgrades on main roads. The energy savings benefits of smart street lighting controls are a major



contributor to the business case for this smart controls rollout. SSROC has therefore been closely following the AEMO proposal to the AEMC and welcomes the AEMC considering reforms in this area that would allow for energy savings initiatives of customers using these systems to flow through on their bills.

In the context of this review, SSROC has been provided with a copy of the submission by IPWEA on Minor Energy Flow Metering and wishes to fully support their comprehensive submission (and previous submission in response to the Consultation Paper).

SSROC would strongly welcome AEMC Minor Energy Flow Metering reforms that facilitate the widespread rollout of smart street lighting controls. In enacting such reform, we are mindful of IPWEA's key point that any new regime must be both simple and low cost to achieve widespread adoption. We would be pleased to comment on any detailed proposals in this area or provide further information as useful.

Should you have any further enquiries in relation to this letter, please contact me by email [ssroc@ssroc.nsw.gov.au](mailto:ssroc@ssroc.nsw.gov.au).

Yours Sincerely

A handwritten signature in black ink that reads 'H Sloan'.

Helen Sloan  
**CEO**  
**Southern Sydney Regional Organisation of Councils**

cc: *Karthik Venkataraman – GM Customer and Partner Experience, Ausgrid*  
*Shannan Hargreaves – Senior Manager Partner Operations, Ausgrid*  
*Jiri Heider - Council Mgr - Lighting & Smart Solutions, Ausgrid*