



Submitted via IPART portal

10 May 2019

IPART
Level 15, 2-24 Rawson Place
SYDNEY NSW 2000

Dear Sir/Madam

Re: Invitation to comment on the draft NSW Public Lighting Code reporting manual

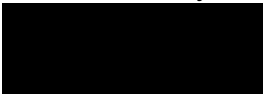
SSROC thanks you for the opportunity to review IPART's draft *Electricity networks reporting manual - NSW Public Lighting Code compliance reporting* document.

1. **COUNCILS WILL STRONGLY WELCOME BETTER REPORTING UNDER THE CODE -**
SSROC supports the requirements of the Service providers to comply with the NSW Public Lighting Code including by producing Annual Performance Reports, Quarterly Reports and an Implementation Report. Public lighting is a vital community service with significant public safety and security implications. Councils, as the road authority for most roads and as the local authority, have exclusive powers to decide whether to light, to what level and in what manner to light roads and other public spaces. Having this power, they therefore have a duty of care to ensure it is exercised responsibly. Without good reporting from the service provider, councils cannot reasonably ensure that their duty of care is being properly met.
2. **SUMMARY INFORMATION ESSENTIAL -** Based on consistent feedback from councils, SSROC suggests that both the Annual and Quarterly reports should be presented in a standardised template, restricted in length (preferably to a single page) and cover only a high level summary of compliance/non-compliance figures for both the council and for the network as a whole. Longer reporting formats are highly unlikely to be a useful tool to help councils manage the service. Any areas highlighted in reports that cause concern can be further investigated by councils directly with the Service Provider at the council's discretion.
3. **ACCOMMODATE REPORTING LIMITATIONS –** SSROC is aware that the current reporting capabilities of the IT systems used by the Service Providers may not readily allow for useful near-term reporting on two specific items in the Code:
 - a. the calculation and reporting on the status of Specific Faults (e.g. more complex repairs) at different phases of the repair (Schedule 1 item 1). This is due to the requirement of calculating the repair period excluding the time taken to obtain a site specific Road Occupancy Licence or other specific authority for road occupancy where the Service Provider has taken all reasonable steps to obtain the Licence or authority as soon as practicable (Schedule 1 item 1, b, ii); and,
 - b. the notification of faults relating to lighting at pedestrian crossings or groups of three or more consecutive lights on a 'Category V road' (Schedule 1 item 2).

SSROC notes that both these items relate to relatively few repairs per year. In the case of the most challenging repairs requiring a specific Road Occupancy Licence application, the Traffic Management Centre informed RMS and SSROC during Code deliberations that broad MOUs with each DNSP cover almost all repairs and fewer than a dozen specific Road Occupancy Licence applications per year per utility are typically received. Given this, SSROC suggests that Service Providers be given an opportunity to detail timeframes under which reporting mechanisms can be implemented and that consideration be given to manual or semi-manual interim reporting approaches in response to these two issues. SSROC and its member councils would not wish to see significant amounts of money spent on short term IT fixes for these items as such costs would ultimately be passed on to the councils by ways of future increased costs. In the case of Ausgrid, SSROC understands that a forthcoming IT upgrade will likely supplant their current maintenance management system completely within 24 months. Provided that there is a plan in place to move to full reporting over a reasonable timeframe and that reasonable interim reporting measures are put in place, councils would almost certainly wish to agree to minor Code variances rather than have large amounts of money spent on short-term IT changes.

Again, thank you for the opportunity to comment and we are happy to contribute to any further discussions.

Yours faithfully

A black rectangular box redacting the signature of Namoi Dougall.

Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils