

**Our Ref:** KMM/gym-50/10/6

30 June 2005



The Independent Pricing & Regulatory Tribunal of NSW  
PO Box Q290  
QVB Post Office NSW 1230

Dear Sir/Madam

**RE: Second Submission Concerning Increases to Public Lighting Charges as Proposed by Energy Australia**

Council put forward a submission in February this year objecting to Energy Australia's first proposal to increase electricity charges for street lighting. Council is advised of Energy Australia's second submission to IPART seeking an increase in street lighting charges by 27.3% in real terms over a 37 month period commencing on 1 July, in this regard Council's objections raised in February remain the same and the following points are reinforced:

- Council has already experienced a 9.8% increase as a result of the 2004/05 review, which took effect from 1 December 2004. This amounted to an increase of nearly \$4,000, which was not provided for in Council's Management Plan;
- Council is limited in its ability to raise revenue by rate pegging legislation, which is in the vicinity of 3% per annum. Obviously Council does not have the capacity to absorb such significant increases;
- Energy Australia's pricing proposal appears to be inconsistent with the National Electricity Code, which recently approved prices in Victoria and with the Council's own detailed analysis of costs and pricing which suggests that a price decrease of approximately 12% would be in order.

Having regard to the impact on our Council, it would be appreciated if the Tribunal could examine the obligations under Clause 2.3 or Rule 2004/1 relating to the impact on customers.

Once again your consideration of the issues raised herein would be appreciated.

Yours faithfully

**Ken Murphy**  
General Manager