



# CANTERBURY CITY COUNCIL

*City of Cultural Diversity*

Our Reference:

S-81-4



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Fiona Towers  
Director, Energy  
Independent Pricing and Regulatory Tribunal  
PO Box Q290  
QVB POST OFFICE NSW 1230

Attention: Emma Kelso

Dear Ms Towers

**Subject: EnergyAustralia Proposal to Increase Public Lighting Prices**

Thank you for your letter dated 15 June 2005 advising of the revised EnergyAustralia public lighting price proposal to IPART and invitation to stakeholders to provide comment on the proposal to the Independent Pricing and Regulatory Tribunal (the Tribunal).

I again provide this submission to IPART, on behalf of Canterbury City Council, objecting to the revised proposal.

- EnergyAustralia have advised in June 2005 that they now propose a price path increase of 10% plus CPI for 2005/06, followed by 5% plus CPI for the subsequent three years to 2008/09. This equates to a 27% real price increase + CPI over the next 37 months. We believe this would significantly overcharge the service provided to our Council by EnergyAustralia. We have now set our 2005/06 Budget for street lighting and funds are not allocated to meet any additional costs proposed.
- We continue to encounter operational difficulties with the service provided by EnergyAustralia which questions whether the increase in pricing would improve the efficiency of the current service. As the service is not contestable we do not have confidence in the accountability of the current charges and what benefit we would in fact receive from the increased charges.
- The proposed price increase covers upgrading of obsolete infrastructure which was not adequately maintained by EnergyAustralia in the past and attempts to transfer the costs of these inefficiencies to councils.
- Council at its meeting of 14 April 2005 resolved to endorse the Southern Sydney Regional Organisation of Councils' (SSROC) opposition to EnergyAustralia's proposed cost increases for public lighting services to public lighting customers. It

also resolved to oppose further attempts by EnergyAustralia to increase costs for public lighting services and make any necessary submission to IPART. Again we fully support SSROC's representative, the Street Lighting Improvement Program, in their submission to IPART.

I trust you will convey our concerns to the Tribunal and thank you for consideration of this submission.

Should you require further information please contact **Mike McGowan** on **9789 9477**.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lara Kirchner', written in a cursive style.

Lara Kirchner  
ACTING GENERAL MANAGER

8 July 2005