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8 July 2005

Independent Pricing and Regulatory Tribunal
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Dear Members of the Tribunal

ENERGYAUSTRALIA'S PROPOSAL TO INCREASE PUBLIC LIGHTING PRICES

Thank you for the opportunity for Council to comment on EnergyAustralia's proposal to increase public lighting charges by 27.3% over thirty six months starting on 1 July 2005.

There are many areas of concern in the proposal and these have been covered by the Street Lighting Improvement Program's submission. Council is a member of Street Lighting Improvement Program and endorses its submission. The proposal, particularly with the foreshadowed additional increases, appears to be a restating of EnergyAustralia's proposal for an increase of 70% on which Council provided a submission in January 2005.

Newcastle City Council would like to emphasise once again our major area of concern. It is that EnergyAustralia's pricing proposal relates to the public lighting services for the 13,000 lights owned by EnergyAustralia in the Newcastle Local Government Area. The service EnergyAustralia provides in relation to these lights is a monopoly and Council has no choice with regard to their maintenance, modification or removal. Council is responsible for the provision of lighting but has no influence on what is already in place and how it is maintained.

There is no opportunity for Council to initiate improved practices, be innovative or have an impact on the substantial cost of this service. If the service was open to competition, either by Council or another supplier, the increase would not be as great and may even be reduced.

Yours sincerely

Janet Dore
GENERAL MANAGER