

20 March 2009

Our Ref: 05-001-03-0014 – RB/ID  
Your Ref:

Mr P Kelly  
Electricity Code Consultative Committee Chairman  
Economic Regulation Authority  
Level 6, Governor Stirling Tower  
197 St Georges Terrace  
PERTH WA 6000

Dear Paul

**Re: Code of Conduct for the Supply of Electricity to Small Use Customers, 2008**

I refer to the preliminary findings from the statutory review of the Code of Conduct for the Supply of Electricity to Small Customers, 2008 (Code).

The WA Local Government Association, on behalf of Local Governments and their communities wishes to make a submission to the Electricity Code Consultative Committee regarding the Code obligations relating to the provision of street lighting.

Retail licensees (Synergy, Horizon Power) and distribution licensees (Western Power, Horizon Power) are all involved in the provision of street lighting services to the community.

The Code of Conduct for the Supply of Electricity to Small Use Customers, 2008 places an obligation on electricity distributors to keep records regarding the timely repair of faulty street lighting. Specifically, under Division 3, Section 13.9 there are two applicable sub-clauses:

1. A distributor must keep a record of –
  - (a) the number of street lights reported faulty each month;
  - (b) the number of street lights not repaired before the agreed date;
  - (c) the total number of street lights; and
  - (d) the average number of days to repair faulty street lights.
2. For the purpose of subclause (1), the number of days taken to repair a street light is counted from the date of notification.

The requirement to keep records does not of itself provide any protection for consumers of street lighting services. Furthermore, the details required to be recorded provides an incomplete view of the level of service being provided and does not relate to the performance standards required under the electricity distribution licences. The “agreed date” referred to in sub-clause 1(b) is likely to be ambiguous for most reported faults and provides no effective measure of the level of street lighting service being delivered.

The Western Power Standard Performance Reference Service A9 “Street Lighting Exit Service” targets fault repair service targets in the metropolitan and rural / remote areas. The target performance level for the repair of reported faulty street lights is five days in the metropolitan area and major regional towns and nine days in rural and remote areas.

The WA Local Government Association strongly supports the amendments proposed in the February 2009 Draft Review Report of the Code that will align the record keeping requirements of the Licence and the Code.

We also note that under the current Code there are no Service Standard Payments applying when a distributor fails to meet the targeted fault rectification performance standard. This contrasts with the approach adopted in some other Australian jurisdictions where Service Standard Payments can be claimed by those reporting street lighting faults, if these are not repaired within the target time-frames.

Western Power no longer inspects street lights for faults, relying instead on preventative maintenance (bulk globe replacement program) and reporting of faulty street lights by individuals and Local Governments. The provision of a Service Standard Payment when faults are not repaired would provide positive incentives for both the reporting of faulty street lights and their repair. The Association urges the Committee to review the effectiveness of Service Standard Payments for street lighting services in other States.

Should you have any questions or matters to follow up regarding this submission, please contact Ian Duncan on 9213 2040 ([iduncan@walga.asn.au](mailto:iduncan@walga.asn.au)).

Yours sincerely

Ricky Burges  
Chief Executive Officer