

19 June 2018

Department of Environment, Land, Water and Planning
PO Box 500
EAST MELBOURNE VIC 8002

Dear Sir/Madam

Re: VICTORIAN ENERGY EFFICIENCY TARGET REGULATIONS 2018 - REGULATORY IMPACT STATEMENT

United Energy welcomes the opportunity to respond to the Department of Environment, Land, Water and Planning (**DELWP**) regulatory impact statement on the draft *Victorian Energy Efficiency Target Regulations 2018 (the Regulations)*.

We are responsible for the maintenance, repair and replacement of public lighting in the United Energy network. While we maintain, repair and replace efficient public lights, the cost of bulk upgrades from non-efficient to efficient lights is the responsibility of the local councils and road authorities. Efficient lights can create savings over time, however, the cost of a bulk upgrade can act as a financial burden that defers installations.

We therefore support the proposed changes to the Regulations that prescribe an upgrade of public lighting as an eligible activity for the Victorian Energy Upgrades program. Providing local councils and road authorities with a financial incentive for an upgrade of public lighting is likely to lead to a faster roll-out of efficient lights across minor and major roads.

We also support the proposal to use the Australian Energy Market Operator (**AEMO**) National Electricity Market (**NEM**) Load Table for Unmetered Connection Points as the source for approved public lighting, removing the need to register the lights separately with the Essential Service Commission (**ESC**). This will ease the administrative burden of introducing new efficient light types into the market.

Should you have any queries about this letter please do not hesitate to contact Sonja Lekovic on (03) 9683 4784 or slekovic@powercor.com.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Brent Cleeve".

Brent Cleeve
Head of Regulation, United Energy