16th February 2023

ATTN: Jessica Curtis – Project Leader
Australian Energy Markets Commission
Level 15 – 60 Castlereagh Street
Sydney NSW 2000

Dear Ms Curtis,

RE: Support of the IPWEA submission on Minor Energy Flow Metering (REF ERC0346)

Schreder is one of the largest outdoor lighting companies worldwide headquartered in Brussels, Belgium. With 2,600 employees and offices in 70 countries, including 7 R&D centres in strategic global locations, Schreder has been a leader in its industry with innovative outdoor lighting products and controls solutions for many decades.

Schreder's local subsidiary Schreder Australia Pty Ltd is the largest street lighting solutions provider in Australia with a majority market share. We count most Australian DNSPs and Main Road Authorities as our customers, as well as many local councils. Many of our products and solutions are developed, delivered, and supported locally with a team of over 100 experts. Schreder Australia's headquarter is in Sydney with local offices and representatives in all major cities around the country.

Street lighting is an important road safety measure. As with many industries, the street lighting industry is undergoing a significant transformation with the emergence of new technologies. Firstly, new LED technology in luminaires enables significant energy savings in comparison to conventional technologies. Secondly, smart street lighting controls systems enable remote asset monitoring, including revenue-grade energy metering, and controls of luminaires.

The street lighting industry has come a long way standardizing the controller interface on luminaires for smart lighting systems with a so called 7-PIN NEMA receptacle, which is based on the global standard ANSI C136.10. As such, the 7-PIN NEMA receptacle has become an integral part of international and Australian street lighting standards and is included in the luminaire specifications of all Australian DNSPs and Main Road Authorities. This means that almost every new streetlight that is installed in Australia is smart-enabled and has the capability to have a controller device attached to connect it to a smart lighting system, which, amongst a range of other things, can meter and report on a luminaire's energy consumption.

Currently, energy consumption for most streetlights is billed as deemed loads under the NEM's type 7 metering approach for unmetered loads. While this approach may have been appropriate in the past for older technology, it does not suit the current technical capabilities of luminaires and smart lighting systems, which include dimming and switching operations that can generate significant energy savings. Adding to this, luminaires and light poles are increasingly locations of interest to deploy smart city sensors and other devices, which in turn can be monitored and the energy consumption can be accounted for by smart lighting systems.

Considering all of this, many of our customers are requesting that the energy metering capability of our smart lighting systems are recognised, and our organization supports the IPWEA submission on Minor Energy Flow Metering, to which we have significantly contributed. We agree that there is a strong case to make changes to the

metering regime in the National Electricity Market that would recognize the metering data being produced by devices such as smart street lighting controls. We encourage both the AEMC and AEMO to make changes in this area that would introduce a straightforward and cost-effective approach to the metering of street lighting and other similar devices in the public domain.

We would welcome the opportunity to discuss IPWEA's submission on Minor Energy Flow Metering in more detail with the AEMC and other relevant parties and to clarify any questions that may arise. In the first instance please contact:

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Yours sincerely,

Kaushal Kapadia

CEO – Australia & New Zealand

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