



14 September 2023

Dear Australian Energy Market Commission (AEMC)

**ASCA support to IPWEA submission for Minor Energy Flow Metering of smart street lighting controls and other similar smart devices in the public domain**

The Australian Smart Communities Association (ASCA) is Australia's only not-for-profit peak body dedicated to advocating on behalf of governments for smart communities in Australia. ASCA works closely with our members across all levels of government to solve problems, enhance policy, capacity, and confidence, and create innovative smart solutions for their communities.

Being at the forefront of smart city deployments, our members have a strong interest in the cost-effective deployment of a wide variety of small energy-consuming devices in the public domain. This includes not just smart street lighting but an array of other smart infrastructure, smart city sensors, CCTV, public Wi-Fi, dynamic signage, autonomous vehicle infrastructure, telecommunications equipment and EV charging infrastructure.

The current metering regime in the National Electricity Market can present high cost and logistical hurdles to deploying these technologies, particularly when separate supply lines and metering cabinets are required.

ASCA's Board strongly endorses the IPWEA's latest submission on Minor Energy Flow Metering that states the following additional benefits

- The acceleration of broader smart streetlight and other city technology deployments
- More accurate inventory and asset management of smart streetlights
- More accurate energy consumption and cost allocation of smart streetlights
- Increased incentives for greater energy efficiency and reduce carbon emissions for streetlights
- Improved smart street lighting reliability and availability, contributing to greater road safety
- Lumin light adjustments to reduce environmental impacts on light sensitive wildlife
- Improved electrical grid performance detection from smart streetlight outage detect and alerts
- Smart energy consumption management of streetlights in high temperatures or to lower baseload energy use

ASCA supports AEMO's proposal to add an additional category of combined Metering Provider accreditation to ensure Metering Providers have the capability and competency specific to the installation and maintenance of MEFM installations.

For the estimated 2.5 million streetlights owned and managed by DNSPs, the DNSPs should also combine the roles of metering coordinator, metering provider and metering data provider to simplify management responsibility and accountability including other smart devices attached to the



pole. Accreditation should equally apply to unmetered non owned DNSP's such as main road authorities and council, or another party should DNSP's not wish to be responsible.

ASCA supports AEMO's proposal to not require remote disconnection, reconnection, on-demand meter reading, scheduled meter reading and meter installation inquiry services from Minor Energy Flow Meters.

ASCA supports very low cost for adopting and complying with a new MEFM regime on a per lighting point basis to encourage take-up and support the opportunity to materially improve metering of these currently unmetered devices and help deliver a wide array of other broader public benefits that smart street lighting controls offer.

ASCA shares IPWEA's concerns on proposed bespoke arrangements to test and inspect existing, new, and emerging metering devices, technologies, and systems, and for these to be assessed for approval to ensure that the integrity of metering data is not compromised. How this will be done in situ needs careful consideration, a preferred model would be to utilise reporting from centralised management platforms instead to keep costs low.

ASCA supports default rated maximum energy load per device for any technologies that are missing, corrupt, defective or unsuitable for some other reason to overcome unpaid consumption concerns and incentivise system availability and up to date asset and inventory management.

Should you have any questions about this submission, please contact ASCA Vice President James Sankar for further information.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Bruce Marshall".

Bruce Marshall  
ASCA President

On behalf of the ASCA Board of Directors.

A handwritten signature in blue ink, appearing to read "James Sankar".

James Sankar  
ASCA Vice President