



Submission in response to

**DIRECTIONS PAPER
NATIONAL ELECTRICITY AMENDMENT
(UNLOCKING CER BENEFITS
THROUGH FLEXIBLE TRADING) RULE
2023
Australian Energy Market Commission**

September 2023

Lighting Council Australia submission in response to the *National Electricity Amendment (Unlocking CER Benefits through Flexible Trading) Rule 2023 Directions Paper published by the Australian Energy Market Commission*

Lighting Council Australia welcomes the opportunity to comment on the National Electricity Amendment (Unlocking CER Benefits through Flexible Trading) Directions Paper published by the Australian Energy Market Commission.

As highlighted in our previous submission dated to 16 February 2023, Lighting Council Australia continues to recommend that smart street lighting systems be facilitated through the adoption of rules for non-traditional metering in the form of minor energy flow metering.

For more information about smart street lighting please click [HERE](#) to view our previous submission.

Lighting Council Australia is appreciative that the AEMC has taken on board the feedback provided in our previous submission and wish to convey our support for the published directions paper.

Question 10: OPPORTUNITIES AND BENEFITS OF IMPROVING EXISTING ARRANGEMENTS

Do stakeholders consider there are other matters that the Commission should consider in terms of the opportunities, benefits, and costs for improving existing arrangements for the measurement of street lighting and public furniture?

No further comment. All matters Lighting Council Australia wish for the Commission to consider are addressed in the previous submission.

We'd like to further emphasise that the current metering rules are preventing the uptake of smart LED street lighting due to requirements such as the need for a metering display that is impractical for typical street lighting installed above roadways.

Current regulations do not accommodate new smart street lighting technology and Lighting Council Australia further requests that regulators develop the rules required to enable development and industry growth within this market.

Lighting Council Australia estimates that the ability to implement smart street lighting systems will provide:

- Significant benefits for consumers.
- Improvements around street lighting safety, security and reliability.
- A platform for increased innovation and flexibility.
- Reduced costs around street lighting commissioning and maintenance.
- The Australian Government with greater access to technologies that work towards decarbonisation.
- Environmental benefits for various species of flora and fauna.
- Long term benefits for consumers.

Question 12: Technical Requirements

- **Do stakeholders have views on the removal or amendment of minimum service specifications for minor energy flow meters?**

Refer to previous submission.

- **Do stakeholders have views on inspection and testing requirements for minor energy flow meters?**

Refer to previous submission.

About Lighting Council Australia

Lighting Council Australia (LCA) is the peak body for the lighting industry in Australia, representing 100 of Australia's leading manufacturers and suppliers. The lighting industry represents approximately 5,000 manufacturing jobs across Australia, and many thousands more in related product development and research, engineering, distribution, sales, and installation.