16 October 2023

ATTN: Suba Ananth
EL-041 Committee SEC
Standards Australia
20 Bridge Street, Sydney NSW 2000

Dear Suba,

RE: IPWEA Street Lighting & Smart Controls Program support for direct text adoption of IEC 62386 parts 150, 250, 251, 252 and 253

IPWEA is the peak association in Australia and New Zealand for infrastructure asset managers and professionals who deliver public works and engineering services. Our members, as the road authorities and as the local government authorities, have primary responsibility for decisions about most Australian public lighting including whether to light, to what level to light to and in what manner to light roads and other public spaces.

With our members' interest in mind, IPWEA's Street Lighting & Smart Controls (SLSC) Program (www.slsc.org.au) was founded in 2016 to accelerate the efficient adoption of modern street lighting and smart controls technologies and best practices throughout Australia and New Zealand.

The SLSC Program is supported by major road lighting and smart controls manufacturers and 3,000 people now regularly receive the SLSC Spotlight eNewsletter. A high percentage of the medium-large councils, main road authorities, utilities and consultants receive SLSC Spotlight, have downloaded key SLSC publications or participated in SLSC events.

IPWEA strongly supports the direct text adoption of AS/NZS IEC 62386 parts 150, 250, 251, 252 and 253 on the basis that this will substantially enhance the asset management of Australian and New Zealand public lighting. We make the following additional comments on specific parts of this family of standards:

- **Part 251 Memory Bank 1 Extension** – Discussions with international suppliers and customers have substantiated the case for being able to automatically download robust manufacturer data directly from outdoor luminaires power supplies using a standard format as envisioned under Part 251 (as well as parts 252 and 253). The early evidence is that this is speeding up luminaire deployment, leading to dramatically higher public lighting inventory accuracy levels and delivering a range of other asset management benefits.

  Beyond our SLSC Program, IPWEA has a particularly strong interest in good asset management for our members and is therefore particularly supportive of this enhancement to standards. Adoption will send a clear signal to both suppliers and

our members about these enhanced asset management capabilities and that they can have confidence that there is a robust, internationally accepted and supplier-neutral approach to follow that allows for true interoperability of luminaires and smart controls.

- **Part 252 Energy Reporting** – The use of smart street lighting controls to dim, brighten, trim and enable constant light output controls will progressively move public lighting away from constant loads to variable energy loads (and corresponding GHG emissions). Part 252 will allow our members to both optimise their use of public lighting and credibly meet their mandatory and voluntary emissions reporting obligations.

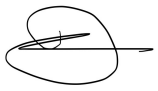
  The SLSC notes the inter-related electricity market reform process underway where the Australian Energy Markets Commission is currently considering recognizing the metering capabilities of smart street lighting controls. This reform, which parallels similar reforms already adopted in New Zealand and other markets, is vital to customers benefiting financially from energy savings measures that they take using smart street lighting controls. Such reforms have been a key enabler of significant uptake of smart street lighting controls in other markets. The SLSC Program expects that adoption by the AEMC of the proposed electricity market reforms will see a dramatic increase in smart street lighting controls adoption in Australia. It is therefore timely that EL-041 is considering the energy reporting aspects of IEC 62386 under Part 252.

- **Part 253 Diagnostics and Maintenance** – The use of smart street lighting controls for the diagnostics and maintenance of public lighting has the potential to:
  a) Optimise maintenance by minimising unnecessary truck rolls, minimising duplicate site visits, allowing for the more efficient scheduling of maintenance routes and helping dispatchers more accurately provision what replacement equipment and parts are carried on maintenance trucks.
  b) Allow asset managers to monitor and report far more accurately on brand and model reliability and performance levels as well as more efficiently administer warranty claims.
  c) Monitor, report on and minimise carbon emissions from maintenance truck diesel fuel use.

If these standards are adopted, IPWEA's SLSC Program would welcome the opportunity to publicise this in the SLSC Spotlight eNewsletter and welcomes hearing from the Committee about any such developments.

Should you have any questions about this matter, please feel free to contact me.

Yours sincerely,



David Jenkins
Chief Executive Officer at IPWEA Australasia