



13 May 2022

Stephen Procter
Strategic Delivery Manager
Sustainability Programs
Energy, Climate Change and Sustainability
Office of Energy and Climate Change

Via email: sustainability@environment.nsw.gov.au

Dear Mr Procter

Peak Demand Reduction Scheme: Consultation Paper for Rule 1

Thank you for the opportunity to comment on the consultation paper and draft rule.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of eleven local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of over 1.8 million, one third of the population of Sydney.

SSROC supports the NSW Government Net Zero target, and our member Councils have their own similar targets. Councils are working to ensure that they reach these targets: in particular, from 1 July 2022 all member councils will have 100% renewable electricity for their own facilities and sites. Most have completed energy efficiency reviews and installed rooftop solar wherever feasible, and taken other measures towards achieving zero carbon emissions. Member councils also have a range of initiatives aimed at helping residents to improve their own energy efficiency and install rooftop solar.

The ability access financial incentives for reducing peak electricity demand will enable councils and their communities to justify further energy efficiency measures, by specifically targeting consumption reduction at peak times. SSROC therefore supports the implementation of the scheme. SSROC also supports the three sub-objectives of improving reliability, affordability and sustainability, all of which align with the organisation's objectives of advocating for regional priorities and advancing regional interests.

Consultation Paper Questions:

Part 1: SSROC does not directly use ESS processes or systems, however the organisation does access relevant information through consultants and other services to develop business cases for member councils considering investment in initiatives such as LED upgrades to street lighting. We therefore support

improvements to processes, and support an open API, since these would make it easier for councils, residents and others to assess the viability of changes to enable control of peak consumption.

Part 4: SSROC would be interested to better understand the scheme as it continues to develop, and to contribute where appropriate. We would be interested in research to identify root problems blocking the uptake of demand response. Of particular interest would be:

- areas where councils might be able to make cost-savings (or off-set the costs of upgrades) by means of peak demand reductions at their own facilities, such as aquatic centres, community centres, depots and other sites.
- opportunities for councils to promote energy efficiency measures to residents where peak demand reductions might be eligible for financial incentives.

In order for this submission to be made before the deadline, it has not been possible for it to be reviewed or endorsed at a formal meeting of SSROC. I will contact you should any issues arise as a result.

If you have any further enquiries in relation to this submission, please contact me by email ssroc@ssroc.nsw.gov.au or phone 02 8396 3800.

I look forward for contributing further to the development of the scheme.

Yours sincerely

A handwritten signature in black ink that reads "H Sloan".

Helen Sloan
Chief Executive Officer,
Southern Sydney Regional Organisation of Councils