



Draft charges for Fire and Rescue
NSW's automatic fire alarm
management services

Information Paper

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The Independent Pricing and Regulatory Tribunal (IPART) is reviewing Fire and Rescue NSW's (FRNSW) fees and charges. Our review will recommend which of FRNSW's services should have user charges; and how FRNSW should recover the costs of providing those services. Our recommendations will inform a review of the *Fire Brigades Regulation 2014* (FB Regulation), and any new charges should apply from 1 September 2022.

This information paper sets out our draft recommendations on automatic fire alarm (AFA) management charges and is structured as follows:

- Section 1 summarises our draft recommendations on AFA management charges
- Section 2 provides an overview of FRNSW's arrangements with Automatic Fire Alarm Service Providers (AFASPs) and current management service charges
- Section 3 explains our approach in making our draft recommendations
- Sections 4 to 6 provide our analysis of user charges for AFA management services, the efficient costs of AFA management services, and our recommended charges
- Section 7 discusses the impact of our draft recommendations.

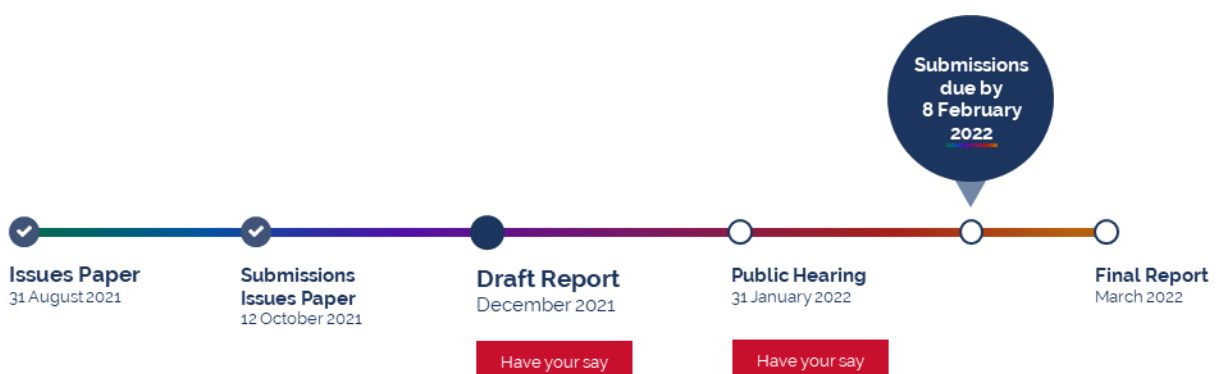
This Information Paper is supported by our [Draft Report](#). Separate Information Papers contain our analysis and draft recommendations on [charging for false alarm call outs](#), [hazmat services](#), [fire safety activities in the built environment](#) and [FRNSW's other services](#).

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Timeline for this review



1 Summary of our draft recommendations

This paper sets out our draft recommended charges for AFA management services. In recommending draft AFA management charges, we have simplified the charge structure. Currently, separate charges apply to first connections and second and subsequent connections at a premises – we are recommending a single charge for all connections. Similarly, we are recommending a single charge for ongoing monitoring for all alarms and a single charge for all transfers.

The level of our recommended charges differs substantially from the current charges for some services. In particular,

- The recommended connection fee is 3 to 6 times higher than the current level.
- The recommended monitoring fee is about 50 to 75% lower than the current level.

Table 1.1 Draft recommended charges for AFA management (\$2022-23, ex-GST)

Fee	Unit	Proposed charge
Alarm installation and monitoring		
Connection	Per event	\$755
Ongoing monitoring fee	Per AFA per month	\$14.45
Transfer	Per event	\$160
New AFASP application		
Application Fee	Per application	At reasonable cost
Maintenance		
Maintenance fee	Per AFA per month	85 cents

2 FRNSW's charges for automatic fire alarm management services

FRNSW enters into arrangements with AFASPs for the installation and maintenance of fire alarm links between fire brigade premises and other premises. These arrangements are known as AFA network service arrangements. FRNSW charges AFASPs for connection, monitoring and system maintenance it provides under these arrangements. There are 3 approved AFASPs that are contracted to FRNSW. FRNSW invoices the AFASP, which in turn invoices its customers, typically building owners or managers.

2.1 Current charges in automatic fire alarm network service arrangements

Unlike user charges for other FRNSW services that are set in the FB Regulation, the AFA management service charges are set in the AFA network service arrangements, consistent with the requirements of the *Fire and Rescue Act 1989*. Table 2.1 below outlines the schedule of fees which are currently charged to AFASPs under the AFA system agreement.

Ongoing fees charged to AFASPs include the monitoring of alarms after installation (per alarm and per month) and fixed quarterly maintenance fees for each AFASP after the first year's upfront payment. There is no adjustment for this maintenance fee based on the number of alarms connected to each AFASP.

Charges per event include initial alarm connection fees, fees for the transfer of AFAs between AFASPs and fees to conduct additional alarm tests. These fees are lower when there is more than one alarm for the same premises or AFASP.

A one-off application fee is charged to new AFASPs to enter the market, however this is very infrequent with only 3 current AFASPs contracted to FRNSW.

Table 2.1 Schedule of AFASP fees and charges in 2021-22

	Charge value	Frequency	Description
Alarm connection installation fee			
First connection	\$256	Per event	To cover the administrative and operational processes to activate a new alarm
Second and subsequent connections	\$128	Per event	
Alarm installation monitoring fee			
Ongoing monitoring fee for first installation	\$57.50	Monthly	To cover the cost of ongoing reporting and management of the AFA system
Ongoing monitoring fee for second and subsequent installations	\$28.75	Monthly	
Alarm installation transfer fee			
Transfer first installation between AFASPs	\$128	Per event	To cover the administrative process to transfer between providers on the IT system
Transfer second and subsequent installations between AFASPs	\$64	Per event	

	Charge value	Frequency	Description
Maintenance fee			
First year	\$51,716	Annual	To cover the cost to commission an IT platform to operate the AFA network
Second and subsequent years	\$12,929	Quarterly	
Testing fee			
Additional service fee	\$84	Per event	Charge for testing AFA equipment – not applied in practice
Retesting fee (third and subsequent tests)	\$1,549	Per event	

Source: Fire and Rescue NSW, Automatic Fire Alarm System Agreement, Attachment B, [Schedule of AFASP Fees and Charges](#).

AFA network service arrangements also include a charge for responding to an automatic fire alarm that is subsequently deemed to be a false alarm. We have reviewed costs associated with responding to an automatic fire alarm and provide our recommended charges for false alarms in a separate Information Paper.

FRNSW levies all of these charges on the AFASPs, which then recover the costs from their customers through separate arrangements.

2.2 Charges for automatic fire alarm management services in other jurisdictions

The arrangements between fire agencies across Australia and the AFASPs operating in each jurisdiction varies. This variation reflects differences in the number of automatic fire alarms in each jurisdiction or size of the relevant market. There are three types of arrangements across Australia:

1. **A number of private companies (AFASPs) monitor automatic fire alarms** under arrangements with the relevant fire agency. This type of arrangement is in place in NSW, Victoria and the ACT.
2. **Fire agency engages one private company to monitor automatic fire alarms.** This type of arrangement is in place in Queensland and Western Australia.
3. **Fire agency monitors automatic fire alarms.** This type of arrangement is in place in South Australia, Tasmania and the Northern Territory.

Table 2.2 provides summary of AFA management and system charges in other jurisdictions.

Table 2.2 2021-22 AFA management and system charges in other jurisdictions

Fee or charge	ACT	NT	Tas
Connection/ registration	\$259 per alarm (first alarm) \$129 per alarm (subsequent alarms)	\$449.90 per alarm	\$841 ^a per alarm
Monitoring	\$56 per month (first alarm) \$28 per month (subsequent alarms)	\$2,618 per annum (pro-rata for part year)	\$714 per alarm (first alarm) \$575 per alarm (subsequent alarms)
Transfer	\$129 per alarm (first alarm) \$62 per alarm (subsequent alarms)	NA	NA
Application	\$59,207 per application	NA	NA
Maintenance	\$13,142 per quarter		
Testing	\$1,572 per series of tests		

a. We have classified Tasmania Fire Service's network fee as alarm connection fee.

Sources: Australian Capital Territory, *Emergencies (Fees) Determination 2021*, Schedule 1, Northern Territory Fire and Rescue Service, *Schedule of Fees*, Tasmania Fire Service, *Fees & Charges – 2021/2022*,

3 How we made our draft recommendations

We took the following steps in making our draft recommendations on AFA management charges:

1. Assessed whether FRNSW's AFA management services should have user charges and whether those charges should be set out in the FB Regulation based on the principles outlined in Box 3.1
2. Estimated the efficient cost of FRNSW's arrangements with AFASPs using a cost build up approach Box 3.2
3. Determined the most appropriate charging structure for FRNSW having regard to 7 pricing principles outlined in Box 3.3
4. Considered the impact of our recommendations on FRNSW and its stakeholders.

This approach is broadly in line with our overall approach for the review and ensures we consider all matters required by our Terms of Reference (see our Draft Report).

In Sections 4 to 7 below, we describe how we have implemented these steps to reach our draft recommendations and findings and present the impact of our recommended charges on FRNSW.

Box 3.1 Principles for assessing user charges and having charges set out in regulation

Principles for assessing which of FRNSW's services should have user charges

We identified whether AFA monitoring and system services should be subject to charges based on the following principles:

- Equity – Where identifiable individuals create specific demand for FRNSW's services, they should pay for them. This includes FRNSW's regulatory activities.
- Efficiency – Where charging for a service ensures scarce resources are better allocated, FRNSW should charge for it.
- Risk mitigation – Where charging for a service provides an incentive for individuals to mitigate risk, FRNSW should charge for it; and where FRNSW undertakes activities that better mitigate risk, FRNSW should charge for them.

Principle for assessing if those charges should be set out in regulation

Once we determined AFA monitoring and system services should have user charges, then we decided whether its charges should be set out in regulations based on whether it is a monopoly service.

Box 3.2 Cost build up approach and capital allowance

We used a 'cost build-up' approach to estimate total efficient costs. Under this approach, we assess efficient operating, maintenance and depreciation costs. We then add an appropriate capital allowance to compensate FRNSW for committing capital investment to arrive at the total efficient costs.

To estimate the efficient operating, maintenance and depreciation costs:

- We analysed information provided by FRNSW on its historical and projected operating costs and activities.
- We engaged consultants, the Centre for International Economics (the CIE), to review information provided by FRNSW and provide expert advice on efficient operating costs of providing hazmat services.

We then added a capital allowance of 10% to account for a share of the cost of purchasing capital items such as buildings and equipment.

Our estimated capital allowance is based on the average Earnings Before Interest and Taxes (EBIT) margin for selected proxy industries, which are comparable to FRNSW in terms of its chargeable activities. These industries included fire and security alarm installation services, investigation and security services, fire protection services and hazardous waste hauling services. The Draft Report provides our analysis of capital allowance in more detail.

Box 3.3 Principles for recommending charges

In recommending charges for attending hazmat incidents, we assessed various options against the following pricing principles:

- Transparent – Key information about the charges should be readily available, such as the authority to charge, charging rates, and, where relevant, the basis of the charges.
- Cost-reflective – Charges should reflect the efficient cost of providing the service
- Equitable – Charges should be equitable and affordable.
- Create positive incentives – Where relevant, charges should incentivise risk mitigation.
- Simple – Charges should be straightforward, practical, easy to understand and collect.

Box 3.3 Principles for recommending charges

- Flexible – Charges should be easily applicable to any new activities that FRNSW undertakes in future.
- Consistent – Charges should be consistent between similar activities conducted by FRNSW and consistent with charges for similar activities conducted by other NSW agencies, where relevant.

4 User charges for automatic fire alarm management services

The first step in our approach for recommending FRNSW's fees and charges is to identify which FRNSW's services should have user charges and have charges set out in the FB Regulation.

The key principles we have applied are:

- Whether there is an identifiable impactor who creates the need for the service in question. Our view is that the impactor or risk creator should pay the costs associated with providing the service.
- Whether the service in question is a monopoly service to decide whether it should have charges set out in the Regulation. If FRNSW is not the monopoly provider of the service in question, customers can choose to engage FRNSW or other services providers in the market. In this case, charges for the service do not need to be set out in the FB Regulation.

We have assessed that AFA management services should have user charges because there is an identifiable impactor.

However, unlike user charges for other FRNSW services that are set in the FB Regulation, the AFA management charges are set out in the AFA network service arrangements,¹ consistent with the requirements of the *Fire and Rescue NSW Act 1989*.

We consider that AFA management fees should also be set in the FB Regulation as FRNSW is the monopoly provider of AFA management services. Therefore, we recommend that the FRNSW Act be amended to provide for charges to be set in the FB Regulation. However, even without changes to the Act, our recommendations on AFA management fees could be implemented via the existing framework. Further discussion on this is provided in the Draft Report in section 4.5.

5 Efficient costs of automatic fire alarm management services

As Section 3 discussed, to make our draft recommendations on charges for AFA management services, we estimated the efficient costs associated with connection, transfer, maintenance, monitoring and testing of AFAs. We did this using a cost build up approach.

5.1 Overview of our draft findings

Overall, we found that the current AFA management charges do not reflect the efficient costs of providing the services. For connection and transfer of AFAs, the current charges are lower than the efficient costs, while those for ongoing maintenance and new AFASP application, the current charges are higher (or likely to be higher) than the efficient costs.

Ongoing monitoring fees showed the biggest difference between the current charges and the efficient costs. This is likely driven by improved economies of scale and significant efficiency gains due to technological advances, leading to cost reduction.

AFA management charges were set many years ago based on the upfront cost and the number of AFA connections at the time. Since then the number of connections has increased substantially due to increased density of both residential and commercial properties which require AFAs. This implies a lower average cost per connection, which is the basis for the charge.

Also, since the fees were initially set, there is likely to have been significant efficiency gains to the AFA system, including far less manual intervention in the maintenance process, or the ability to undertake some of the work remotely.

Table 5.1 provides a comparison of the current AFA management charges and the estimated efficient cost.

Table 5.1 Comparison of current AFA management charges and costs (\$2021-22)

	Unit	Charge	Costs
Alarm installation and monitoring			
First Connection	Per event	\$256	\$665
Second and Subsequent Connections	Per event	\$128	\$665
Ongoing monitoring fee for first installation	Yearly	\$690	\$72
Ongoing monitoring fee for second and subsequent installations	Yearly	\$345	\$72
Transfer first installation between AFASPs	Per event	\$128	\$143
Transfer second and subsequent installation between AFASPs	Per event	\$64	\$143
New AFASP application			
Application Fee	Initial	\$58,239	
Maintenance			
First Year	Annual	\$51,716	\$50,000
Second and Subsequent Years	Quarterly	\$12,929	\$12,500
Testing			
Additional Service Fee	Per event	\$84	
Retesting Fee	Third and subsequent tests	\$1,549	

Sources: Fire and Rescue NSW, Automatic Fire Alarm System Agreement, Attachment B, [Schedule of AFASP Fees and Charges](#), The CIE, Efficient operating costs of providing Fire and Rescue NSW's services, Draft Report, 14 December 2021, p 2

5.2 Our approach to estimating efficient costs

We invited FRNSW to provide information on their costs associate with AFA management and system services. We commissioned the CIE to review this information and provide advice on efficient operating costs.

The CIE found that AFA management fees make on average \$10.3 million a year in revenue for FRNSW, the second largest proportion of their revenue. This has risen in the past 5 years and is expected to continue with the increasing density of premises requiring AFAs.² The CIE analysed costs associated with each of the following AFA management and system services:

- AFA connection
- Ongoing monitoring
- Transfer of AFAs (to a different AFASP)
- Maintenance
- Testing
- Application assessment for a new AFASP

The sections below provide key findings for AFA management services.

5.2.1 AFA connection

A \$256 connection fee is charged for the first AFA connection, then half the fee is charged for the second and subsequent AFA connections at the same premises.

This charge is to recover the administration costs of establishing a new AFA connection and to recover the costs of a fire brigade crew attending the premises to conduct a "Brigade Exercise". The CIE estimates that the total cost to connect an AFA is \$665, comprising:

- the average administration costs of \$143 per AFA: To connect and activate a new alarm, FRNSW first assesses the application and set up the relevant systems for operation. This is estimated to take an average of 90 minutes for an administrative staff member, costing FRNSW \$143 per initial connection.
- the average costs of a "Brigade Exercise" of \$522: Once administration work is done, an operational team is then required to travel to the premises, arrange access and conduct a safety risk assessment. This is generally undertaken by a 4-person crew in a standard pumper and can take an average of 60 minutes, costing FRNSW around \$522 per connection.

The CIE found that the process for FRNSW is identical whether it is an initial, second or subsequent connection and hence estimated the same costs for all connection types.³

5.2.2 Ongoing monitoring of the AFA systems

FRNSW charges a monthly monitoring fee for every connected AFA. The fee for the first AFA is \$57.50 per month and a fee of \$28.75 is charged for the second and subsequent installations.

The monthly monitoring fees recover the costs for FRNSW to operate the AFA system, such as ongoing reporting and logistics, and managing the AFA System Agreement.

FRNSW incurs ongoing costs to operate the AFA system, reporting and logistics. Managing the AFA network service agreement may also contribute to these costs though this activity is infrequent.

The CIE found that there are two main teams, each comprising of 4 key staff members, who undertake all the administration and monitoring activities required for ongoing operation of the AFA systems. The total staff cost of these two teams, including on-costs, is estimated at \$1,231,267 per annum. With 17,055 AFAs in the system (i.e. in 2021), the cost per AFA is \$72 per year.⁴

5.2.3 Transfer of AFAs between providers

FRNSW charges transfer fees when a premises owner changes its AFASP. The transfer fee for the first connection is \$128 and second and subsequent connections for the same premises have a transfer fee of \$64.

To estimate the costs of transferring AFAs between AFASPs, the CIE have considered similar activities to the initial connection, minus the need for premises inspections and risk assessments (unless a reassessment is needed under certain circumstances). Therefore, with administration costs alone, a transfer has been estimated to cost \$143 each.

The CIE found no difference in the process for FRNSW whether it is an initial, second or subsequent alarm and hence estimated the same costs for all alarms.⁵

5.2.4 Maintenance costs

AFASPs are required to pay ongoing maintenance fees, which cover the cost of the IT platform that facilitates the AFA system.

FRNSW charges a quarterly fee of \$12,929 for existing AFASPs. A new AFASP would be charged \$51,716 for the first full year, and then move to quarterly charges.

The CIE identified that the only cost driver of the charged quarterly maintenance fee is the underlying IT platform used to operate the AFA network system. This platform is also shared with hazmat services and building fire safety operations which make it difficult to determine relative costs specific to AFA management.

However, the CIE concluded the current quarterly fee is likely to reflect the cost of IT platform needed to operate the AFA system, which is estimated to be \$150,000 per year.⁶

5.2.5 Testing

FRNSW can charge for testing AFA equipment. The charges in the agreement are an additional service fee of \$83.90 per testing per hour (plus expenses) and \$1,549 per testing for third and subsequent tests.

The CIE did not estimate the costs associated with testing AFAs. It noted that the current testing charges are outdated and are not applied in practice. FRNSW does not perform testing of a physical alarm and is more likely to test the connection to the AFA IT platform, which can be done remotely. There is no information about the number of actual tests being performed.⁷

5.2.6 Application fee

There are 3 approved AFASPs that are contracted to FRNSW. Anyone can apply to become an AFASP, and currently FRNSW would charge a fee of \$58,239 per application; however FRNSW has advised that there has only been 1 application in recent years, and it was rejected and most of the fee refunded.

The CIE found that applications for new AFASPs are very rare and the administrative process was difficult to assess. Therefore, it was unable to determine if the \$58,239 application fee was reflective of FRNSW's costs.⁸

6 Recommended charges for automatic fire alarm management services

The third step in our approach for recommending AFA management charges is to decide on the appropriate charging structure and level, having regard to 7 pricing principles outlined in Box 3.3.

Recommendations

- ✓ 24. Automatic fire alarm management charges be set for 2022-23 as set out in Table 6.1

Table 6.1 compares the current charges with our recommended charges. Overall, we recommend:

- a substantial reduction to the ongoing monitoring charge
- an increase to the connection charge
- little change to the transfer charge
- little change to the total annual charge for maintenance.

Table 6.1 Comparison of current and recommended charges (ex-GST)

	Current (\$2021-22)	Recommended (\$2022-23)
Alarm installation and monitoring		
First Connection	\$256 per event	
Second and Subsequent Connections	\$128 per event	
All connections		\$755 per event
Ongoing monitoring fee for first installation	\$57.50 per month	
Ongoing monitoring fee for second and subsequent installations	\$28.75 per month	
Ongoing monitoring for all AFAs		\$14.45 per AFA per month
Transfer first installation between AFASPs	\$128 per event	
Transfer second and subsequent installation between AFASPs	\$64 per event	
Transfer of all AFAs between AFASPs		\$160 per event
Maintenance		
First Year	\$51,716 per annum	-
Second and Subsequent Years	\$12,929 per quarter	-
Ongoing maintenance fee	-	85 cents per AFA per month
Testing		
Additional Service Fee	\$83.90 per hour (plus expenses)	-
Retesting Fee	\$1,549 per event for third and subsequent tests	-

We considered the CIE's analysis of the efficient costs associated with AFA management and recommend several changes to the current charges.

We recommend a single charge for connection, transfer and ongoing monitoring

For connection, transfer and ongoing monitoring, FRNSW currently charges different fees depending on whether it is an initial service or second and subsequent services with second and subsequent services being charged at half the initial fee. However, as discussed above, the CIE found that the process is the same for all alarms and hence the costs are the same between initial, and second and subsequent services. Therefore, we recommend a single charge for connection, transfer and ongoing monitoring.

We recommend lowering the current ongoing monitoring fee

FRNSW currently charges \$690 per annum for the ongoing monitoring fee for a first installation with the second and subsequent installations being charged at half the initial fee. The ongoing monitoring fee represents the biggest portion of FRNSW's revenue from AFA management.

Our review of FRNSW's costs associated with ongoing monitoring shows that FRNSW's current charge (\$690 per AFA per annum for initial installation or \$345 per AFA per annum for second and subsequent installations) is higher than the estimated efficient cost (\$72 per AFA per annum). Therefore, we recommend reducing the current monitoring fee to reflect the efficient cost.

Our recommended ongoing monitoring fee includes the costs of waived false alarms

Our recommended monitoring fee includes \$7.61 per AFA to account for the costs of waived false alarms.

FRNSW levies separate charges when it attends false alarms from AFA systems (these are discussed in a separate Information Paper).⁹ It has a policy to waive the false alarm charges if the alarm owner undertakes certain activity to reduce the occurrence of the false alarms. In most cases, it refunds 75% of the charge, in some cases it refunds the full charge. FRNSW waived an average of 1,024 charges over the last 3 years.

Based on our recommended false alarm charge of \$1,975¹⁰ and the average number of waived false alarm charges, we estimate that \$1.6 million of revenue will be forgone due to the waivers policy. We consider this should be recovered through the monitoring charges.

We recommend an application fee be charged at a reasonable cost

As discussed above, the CIE was not able to establish a reasonable cost base for the application fee. FRNSW noted that it received only 1 application in the last 10 years and there was no standard assessment and administrative process. FRNSW refunded most of the application fee except costs incurred (the application was rejected).

While we were not able to estimate the efficient costs of assessing an application, we consider the current fee of \$58,239 is likely to be too high, is unlikely to reflect FRNSW's costs and act as a barrier to entry to the market for new AFASPs. For example, we administer operating licences for 3 public water utilities and also licence and manage audits and compliance for alternative water utilities in NSW under the *Water Industry Competition (WIC) Act 2006*.¹¹ Our application fee for a WICA licence is currently \$2,500.¹²

Given that we do not have a reasonable cost base to recommend cost reflective charges, we recommend FRNSW charge for assessing an application at a reasonable cost.

We recommend an ongoing maintenance fee of 85 cents per AFA per month

Currently, FRNSW charges all 3 AFASPs an equal quarterly maintenance fee. While the total amount of the charge is consistent with the CIE's estimate of FRNSW's efficient costs, we consider an equal fee for each AFASP does not reflect the relative maintenance cost across each of the providers. Also, the current maintenance fee \$51,716 for new AFASPs the first full year is likely to act as barriers to market entry.

We recommend changing the fee structure to a monthly charge per AFA.

- Per AFA charge ensures an AFASPs with more connections pay higher maintenance charges.
- The same charging basis of per AFA per month for maintenance fee and ongoing monitoring fee leads to a simpler billing and administration process.

The CIE estimated that the total maintenance cost is currently \$150,000 per year for 17,055 AFAs. We have converted this into a cost per AFA per month, and applied a capital allowance and inflation to arrive at the recommended charge of 85 cents per AFA per month.

We consider our recommended charge is more equitable for AFASPs with a different market share and would also help to reduce barriers to market entry.

We recommend testing be removed from AFA management charges

As discussed above, the number of actual tests being performed is not known and testing charges have not been applied in practice. Given that FRNSW has not been charging for testing, we consider the incremental cost is likely to be low, and we recommend testing charges be removed from AFA management charges.

7 Impact of our draft recommendations

Table 7.1 shows the impact of our recommended charges on FRNSW. Our recommended draft charges result in a material reduction in FRNSW's revenue from AFA management and system service from \$12 million to around \$3.7 million. This is a net effect of:

- A substantial reduction in the recommended ongoing monitoring charge
- An increase in the recommended connection charge
- Little change in the recommended transfer charge
- Little change to the total annual charge for maintenance.

Table 7.1 Estimated revenue: current charges vs recommended charges (\$2022-23, ex-GST)

	Current	Recommended	% change
Connection	\$175	\$535	205%
Ongoing monitoring fee	\$11,466	\$2,950	-74%
Transfer	\$20	\$25	27%
Maintenance	\$158	\$174	10%
Total	\$11,819	\$3,684	-69%

We note that this is a substantial reduction in one source of revenue for FRNSW. This revenue, while not required to cover the efficient costs of AFA management services, has been effectively applied to the costs of other FRNSW activities. In future, some of those costs could be recovered:

- directly by introducing charges for those activities specifically (for example the contestable services described in the "other services" information paper), or
- where the revenue is supporting core uncharged service activities such as fire-fighting or rescue services, by an increase in the Emergency Services Levy.

¹ FRNSW Act, s42(1A).

² The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, p 50.

³ The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, pp 51-52.

⁴ The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, p 53.

⁵ The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, p 53.

⁶ The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, pp 53-54.

⁷ The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, p 54.

⁸ The CIE, *Efficient operating costs of providing Fire and Rescue NSW's services*, Draft Report, 14 December 2021, p 53.

⁹ IPART, Draft charges for false fire alarms, Information paper, December 2021.

¹⁰ IPART, Draft charges for false fire alarms, Information paper, December 2021, p 2.

¹¹ IPART, 'Licensing', accessed 15 December 2021.

¹² IPART, 'What are the fees and costs associated with obtaining and holding a licence?' under 'Frequently Asked Questions - WICA', accessed 15 December 2021.