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Our Ref: HW2020-1244/2

Water Regulation Review
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop, Sydney NSW 1240

Dear Ms Donnelly

WATER REGULATION GUIDANCE

Thank you for the opportunity to provide feedback on IPART's Water Regulation Draft Handbook and draft Information Return.

We understand that the purpose of the handbook is to provide guidance to water businesses in preparing pricing proposals and managing ongoing performance under your new 3Cs framework.

The Draft Handbook is a high-quality document that strikes the right balance between expectations and detail. It is well written, well presented and captures all of the elements of IPART's new regulatory framework.

This response highlights those, relatively few, areas where we are unsure of IPART's intent or expectations. We either ask questions or propose clarifications.

We provide similar feedback on the revised information returns. We would welcome the opportunity to provide further feedback after we submit the 2022-23 AIR.

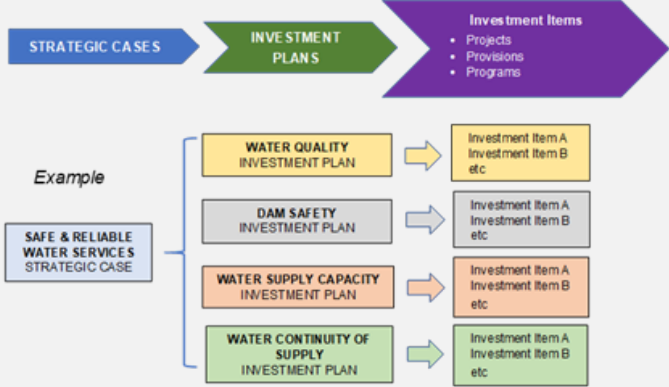
Hunter Water commends IPART for its consultative approach in developing the guidance material. We understand that we can ask the Secretariat further questions on specific details as we progress through the early engagement process.

Should you have any queries on this feedback, please contact Emma Turner [REDACTED]

Yours faithfully

JENNIFER HAYES
Executive Manager Finance and Business Performance

ATTACHMENT 1 – HUNTER WATER COMMENTS ON DRAFT HANDBOOK

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
3 Engagement and long-term planning				
Engaging with customers	3.1	17-25	IPART sets out example principles and uses case studies to highlight or illustrate leading practice	Good work Secretariat – the use of case studies if an effective way of communicating expectations.
Develop long-term investment plans	3.2	26-29	<p>Handbook describes the importance of long-term planning, and contains detailed guidance about the form and matters this planning should address. IPART makes references to a “long-term plan”.</p> <p><i>“Plans need to be continually updated with new information to ensure the business is sufficiently nimble, adaptable to new conditions and is managing risks.”</i></p>	<p>Does IPART expect that a water business should have a single long-term plan that covers everything? This section could be clearer by standardising use of the following terms: e.g. long-term plan(s), business plan, long-term investment plan(s), robust multi-decade plan, long-term strategies.</p> <p>Instead of a single long-term plan, Hunter Water has a number of long-term strategies and plans that cover various asset or outcome areas (e.g. water security (Lower Hunter Water Security Plan), inland wastewater treatment plants (Hunter River Estuary Master Plan), bulk water resilience, carbon strategy). We are developing ~25 Investment Plans, structured by outcome where possible, and informed by these long-term plans and customer insights. The Investment Plans lay out the investment needed to achieve the desired outcomes, including how the plans may need to adapt to future uncertainties.</p>  <pre> graph LR SC[STRATEGIC CASES] --> IP[INVESTMENT PLANS] IP --> II[Investment Items • Projects • Provisions • Programs] subgraph Example SCS[SAFE & RELIABLE WATER SERVICES STRATEGIC CASE] --> WQIP[WATER QUALITY INVESTMENT PLAN] SCS --> DSP[DAM SAFETY INVESTMENT PLAN] SCS --> WSCP[WATER SUPPLY CAPACITY INVESTMENT PLAN] SCS --> WCSI[WATER CONTINUITY OF SUPPLY INVESTMENT PLAN] WQIP --> IIA1[Investment Item A Investment Item B etc] DSP --> IIA2[Investment Item A Investment Item B etc] WSCP --> IIA3[Investment Item A Investment Item B etc] WCSI --> IIA4[Investment Item A Investment Item B etc] end </pre> <p>We question the benefits of combining all services and all aspects of each service into a single long-term plan – the Long-Term Capital and Operating Plan (LTCOP) idea in Sydney Water’s Operating Licence. The biggest downside of a single plan is the difficult of keeping everything up-to-date. Combining studies, data and forecasts from multiple sources means a single plan needs constant revisions.</p> <p>In addition to our 10-year business plan submitting annually to NSW Treasury, we typically consider new information at the project level and evaluate how this does or does not change the broader long-term plan or Investment Plans when making project-level decisions. We continually reconsider and adapt our plans as new information comes to hand, but the long-term plans or Investment Plans are only re-written, or documentation updated, periodically or when warranted based on the materiality of departure from the original plan.</p>

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
4 Elements of a pricing proposal				
Proposal audience and style	4.1	36	<i>"We may also request additional information or evidence from a business to support its assessment of its proposal."</i>	<p>We agree with IPART's guidance on including information and evidence to support its pricing proposal and self-assessment. We are working towards a proposal that is readable and accessible by a wide audience, including customers and other stakeholders. Past proposals have tended to include everything that may be relevant for the IPART review team and expenditure consultants.</p> <p>We are keen to work with the Secretariat to establish expectations about the scope and content of supporting documents, and the best way to reference this information in the proposal. This mainly relates to the evidence base supporting operating and capital expenditure proposals.</p> <p>"Probabilistic cost estimates" is a good example. We have detailed internal cost estimation guidance and business case requirements in our investment gateways. We can talk with the Secretariat about a documentary library that captures this information.</p>
	4.4.2	39	<i>"Relevant supporting information should be made available to IPART on request, such as business cases and probabilistic cost estimates for capital projects"</i>	
Operating expenditure	4.4.2	40	Base-step-trend model	<p>We support the move to the BST framework and welcome IPART's guidance. We have various questions on the practical detail: forecasting digital opex (software as a service), exact definition of recurrent controllable and uncontrollable opex and what's the best way to present major movements in input prices? These questions can be best resolved with the Secretariat using real-life examples.</p>
Form of price control	4.7.3	45	<i>"Businesses would propose the form of price control that is supported by its customers and aligns with the long-term interests of customers."</i>	<p>We envisage that there would be sufficient flexibility for water businesses to:</p> <ul style="list-style-type: none"> propose the method of engagement most appropriate for the topic, along with an appropriate balance between inclusivity, accessibility, representativeness and statistical robustness. seek feedback from the Secretariat or Tribunal on any specific concerns about the proposed engagement, to ensure that we are appropriately adhering to guiderails, as part of the commitment to learn together as we implement the new framework.

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
Price structures	4.7.4	46	<p><i>“We expect businesses to engage with their customers on price structure. A business may propose prices diverging from usage prices based on LRMC, for example to include an uplift to manage drought costs or where there are clear customer preferences for different pricing strategies.</i></p> <p>...</p> <p><i>Businesses can propose alternative pricing approaches that are supported by customers and address potential bill and affordability impacts.”</i></p>	<p>Phase 1 of our customer engagement plan asked customers open questions about matters that concerned them or where we could do better. Other than overall bill smoothing, tariff structures did not feature in the feedback.</p> <p>This implies a need to engage with customers on a specific topic, irrespective of customer interest in the topic and irrespective of the materiality of any changes to price structures. We would prefer more flexibility, for example listing considerations when deciding whether and how to engage on price structures or specifying circumstances under which engagement would be mandatory.</p> <p>We engaged with customers in 2018 on price structures (The CIE survey of residential and non-residential customers). We asked about:</p> <ul style="list-style-type: none"> • The balance between water usage and fixed charges • The large water user price discount • Wastewater price structures for households e.g. sewer usage charges, differential or common service charges for apartments and households <p>The survey found that, generally, participants responded in a way that sought to minimise their own bill. Customers with lower water usage preferred higher water usage prices, and customers with higher usage preferred higher service charges. People living in houses preferred that houses and apartments paid the same wastewater service charge whereas people living in apartments preferred that apartments paid a wastewater service charge lower than houses.</p> <p>We have almost completed the transition to IPART’s preferred price structures, which seek to balance cost reflectivity, customer preferences and customer impacts.</p> <p>Bill movements and affordability has a number of dimensions – average impacts on major customer cohorts and bigger impacts for smaller groups of people with low income levels. We interpret IPART’s guidance as providing the scope to consider and propose measures or prices that address affordability concerns for vulnerable customers, provided we have support from the broader customer base.</p>

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
Grading – estimating customer value	4.8.2	48	<p><i>“Each step change in performance above Standard should reflect an additional, tangible increase of customer value. We have not put a numeric requirement on the ‘value’ delivered because it can be difficult to measure, and we do not want to discourage businesses. A business does, however, need to show they are delivering a genuine improvement, both quantitatively and qualitatively.”</i></p> <p><i>“We would expect businesses to use the same approach to estimating customer value that they would use to justify projects. We anticipate this process will include benefit calculations based on customer willingness to pay or other measures of economic value (e.g. the long run marginal cost of water savings) depending on how they are creating value. “</i></p>	<p>We agree that it is appropriate to describe, and test with customers, the overall value proposition contained in our pricing proposal. We are not aware of any regulated utility in Australia or any water businesses in the UK having quantified the improvement in customer value.</p> <p>The draft Handbook appears to set an expectation that water businesses will conduct an economic willingness to pay survey and CBA covering the whole pricing proposal <i>‘in the round’</i>. As above, we are not aware of any examples of this from any jurisdiction of utility sector. We are familiar with WTP studies of changes in specific service levels, but we are not familiar with techniques to test value across all services and all elements of each service.</p> <p>As this is a new expectation, we encourage IPART to provide case studies and examples in the Handbook.</p> <p>Notwithstanding the conceptual design challenges, the timing of such an exercise would be challenging. Willingness to pay surveys and subsequent CBAs take at least six months to conduct and cost a minimum of \$100,000 in external expert costs. We envisage that the research would need to be conducted well before finalising the entire proposal.</p>
Credibility	4.8.3	49	<p>IPART outlines the Board endorsement requirements covering quality assurance checks and commitments to promoting the long-term interests of customers. The handbook specifically refers to the business’s best customer value proposition and delivering services at the lowest sustainable costs consistent with a Board-approved cost efficiency strategy or equivalent document.</p>	<p>We had expected IPART to link the Board attestation to the business’s 3Cs self-assessment and proposed grade, directly. Customer value proposition and cost efficiency are built into IPART’s 12 principles and grading rubric (Appendix B). We question why IPART is introducing the cost efficiency strategy in the attestation statement, when the 3Cs model sets out detailed guidance on customer value and costs in the Tribunal’s expectations for standard and higher-quality proposals.</p>
5 Addressing the changing revenue needs of water businesses				
Replacement of price determination	5.1.1	57	<p><i>“If businesses wish to promote a custom price path to take effect after a determination has reached the end of its term, this should be considered in full in the price review process and account for all factors that affect prices.”</i></p> <p>IPART lists requirements around engagement and customer acceptance, and promoting customer value.</p>	<p>Hunter Water formally requested an extension of the current period on the basis that the extra year would provide time to fully address and implement the many change to IPART’s regulatory framework, including the design of a customer engagement plan. The extension also allowed IPART an extra year to finalise the framework review.</p> <p>The postponement rule could be as simple as allowing annual CPI pass through, a standard feature of the current model, with a post period true up. We will test this with customers if we propose a change.</p>
Managing revenue risks	5.3	61	<p><i>“If we include a true-up of operating expenditure not reflected in the previous opex allowance in the new opex allowance, this new opex allowance is used in the EBSS calculations for that determination period.”</i></p>	<p>We welcome the detailed guidance on the interplay of expenditure allowance adjustments and the EBSS and CESS mechanisms. We welcome IPART’s guidance on true-ups, namely that they can cover operating expenditure as well as capital costs.</p>

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
6 Using financial incentives to drive performance				
ODI rates	6.3.3	80	<p><i>“The information on customers’ preferences that is used to guide baselines and ODI payments needs to be unbiased, up-to-date and accurate. Methods to estimate customer value should consider, or weight, a range of appropriate estimates, and be verifiable. They will depend on the exact outcome that has been proposed, but could include academic studies, industry benchmarks, willingness to pay studies, or estimates of the ‘opportunity cost’ of a change in performance.”</i></p> <p><i>“In the absence of explicit measures of customer value, businesses should be able to demonstrate that customers are aware of the likely costs of achieving performance outcomes and are happy to accept the likely bill impact associated with that outcome.”</i></p>	<p>We interpret this as meaning that IPART prefers setting ODI reward and penalty rates based on marginal benefits. However, if marginal benefit estimates are not available then it would consider using marginal costs. This approach is consistent with that adopted by Ofwat for the 2024 price reviews for outcome delivery incentives associated with performance commitments (Ofwat, Dec 2022 “<i>Creating tomorrow, together: Our final methodology for PR24, Appendix 8 Outcome delivery incentives</i>”). We support this approach.</p> <p>The method used to estimate customer value should be proportional to the materiality of the outcome incentive. With this in mind, particularly noting the overall cap on financial incentive scheme for the first-round implementation of the 3Cs framework, we envisage benefit transfer will be a useful method. The draft Handbook could more clearly state whether benefit transfer is acceptable. We would welcome additional guidance on the circumstances under which IPART would expect water businesses to conduct primary research (e.g. stated preference surveys).</p> <p>We note that customer research indicating that customers “<i>are happy to accept the likely bill impact associated with [ODIs]</i>” would need to be conducted towards the end of pricing proposal development, so that participants can be provided with overall context about other proposal bill impacts and overall acceptability.</p>
	6.3.3	81	<p><i>“Customers should also be consulted on over/under performance payment rates for each new regulatory cycle based on the business’s current performance.”</i></p>	<p>We note that Ofwat, in collaboration with the Consumer Council for Water UK, has developed “<i>Guidance for water companies: testing customers’ views of the acceptability and affordability of PR24 business plans</i>”, including pro forma survey questionnaires. Elements of this approach would appear appropriate for us to adapt to incorporate over/under performance payment rates.</p>

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
Appendix B Grading rubric				
Customer outcomes Performance measures support outcomes	App B	99	Expectations for a standard grade: <ul style="list-style-type: none"> Propose performance targets for each measure, referencing IPART’s principles, with: – internally consistent short-, medium- and long-term targets 	A well-intentioned water business may find it challenging to propose short, medium and long-term targets in their 2024 submissions. As an example, there may have been insufficient technical and economic investigation to propose a numerical target for say, adoption of digital services by customers, over the next 10 or 20 years. In some instances, the pricing proposal may include funding for activities, such as studies and stage trials, to help determine appropriate long-term targets. It would be reassuring if the handbook clarified that a water business could have some ‘TBA’ targets and a commitment to do the analysis (to enable development of the target) within a reasonable timeframe, particularly for a standard grade.
			Expectations for an advanced grade: <ul style="list-style-type: none"> Targets show a step change improvement to customer value and include adequate protections for individual customers. 	<p>Please explain what is meant by “include adequate protections for individual customers”. We assume that an example of meeting this criterion would be to propose outperforming the dry weather wastewater overflow system performance standard in our operating licence but having Customer Contract rebates for individuals affected or having an investment program to address small pockets of individual customers that are more frequently affected.</p> <p>Another example may be offering an opt-in option to have a digital meter associated access to data and alerts. The protection mechanisms may be a program that assists customers experiencing financial vulnerability to access the benefits at a reduced cost.</p>
Customer outcomes Accountability for customer outcomes	App B	99	Expectations for an advanced grade: <ul style="list-style-type: none"> All outcomes include steps the business will take if not meeting targets, and where appropriate, are supported by outcome delivery incentive (ODI) payments/penalties. 	<p>We assume that this means that water businesses need to:</p> <ul style="list-style-type: none"> Propose ODIs for some outcomes Propose non-financial redress mechanisms for other outcomes. <p>We are seeking clarification whether this interpretation is correct. If so, we would welcome case studies or examples of the latter, and assume some ideas could be drawn from Victorian water businesses.</p>
			Expectations for a leading grade: All important customer outcomes with high customer value supported by ODI payment/penalty rates and targets.	The difference in descriptions between advanced and leading implies that financial ODIs are superior. Please explain why this is the case. Is it realistically achievable for water businesses to propose financial ODIs for all important outcomes for the first iteration of price reviews under the framework? If not, there may be benefits in revising the descriptions for advanced and leading during the transition period to better align with IPART expectations for the 2024-25 price reviews.
Balance risk and long-term performance Manage risks and reprioritise	App B	102	Expectations for an advanced grade: <ul style="list-style-type: none"> Demonstrated it has organisational resilience to absorb cost impacts arising from changes in the operating environment 	This expectation is unclear and subjective. We’re not sure how we would demonstrate organisation resilience to absorb costs. We would welcome further guidance on what this means and the sorts of evidence to support this grade.

Chapter	Section	Page	IPART guidance	Hunter Water questions and comments
Commitment to improve value Cost efficiency strategy	App B	103	Expectations for a standard grade: The business has a management approved and externally published cost efficiency strategy that includes: an annual 'efficiency factor' across opex and capex <ul style="list-style-type: none"> productivity improvements achieved and proposed, which highlight that the business is adopting innovations how it has performed against current period targets. <i>(emphasis added by HWC)</i>	We are not aware of any price regulated utility in Australia, or public company in a competitive market having a stand-alone externally published cost efficiency strategy. Most price regulated utilities incorporate this information into their business plans or price submissions e.g. UK submissions to Ofwat PR19. Given this is a new expectation for a standard proposal, it would be useful if the Handbook provided case studies or links to examples. This would provide clarity to regulated water businesses on an indicative level of detail in the document without being overly prescriptive about how the requirement is met.
			Expectations for an advanced grade: Provides modelling to show that proposed prices: <ul style="list-style-type: none"> are sustainable over time, and would avoid large future bill impacts 	What does " <i>sustainable over time</i> " in mean in this context? Is it referring to price level stability within and between regulatory periods?
			Expectations for an advanced grade: Provides modelling to show that proposed prices: <ul style="list-style-type: none"> Have been informed by LRMC model estimates 	It's not clear how this differs from the second point under the expectations for standard "Proposed cost-reflective maximum prices for customers, with: a balance of fixed and usage charges that takes into account the LRMC of providing services"
Equitable and efficient cost recovery Propose cost-reflective prices	App B	103	Expectations for an advanced grade: Provides modelling to show that proposed prices: <ul style="list-style-type: none"> Consider the impact of climate change on the level and structure of prices addressed 	The expectation is unclear. Does this relate to demand volatility, given increased frequency off droughts and floods under climate change projections? It would be useful if the handbook provided some examples of how IPART envisages this consideration could be achieved in practice.


ATTACHMENT 2 – HUNTER WATER COMMENTS ON DRAFT INFORMATION RETURN

Worksheet	Table	Heading	Row label or reference	Hunter Water questions/comments
General				<p>We understand that it is useful to protect the template, so that formulae are not inadvertently changed or formatting changes inadvertently affect automated data export into other models.</p> <p>It would be useful if IPART could leave unlocked several columns (say, 6) to the right of data tables. This would enable water businesses to clarify responsibilities for data input across a large number of internal contributors. It could also be used for internal quality assurance processes.</p>
Non-financial	<p>Table 1.1 Customer Profile - Water</p> <p>Table 1.3 Customer Profile - Wastewater</p> <p>Table 1.3 Customer Profile - Stormwater</p>			<ul style="list-style-type: none"> Hunter Water recently reviewed non-financial tables 1.1 to 1.3 in consultation with IPART. This review ensured that customer data reported in the AIR is consistent with how we bill and includes all the information IPART needs to calculate our prices. We would like the property types in these tables to remain as per our current AIR (or for enough blue input cells to be available that we can input our property types). This relates to all three services. In relation to the water and wastewater customer profiles: <ul style="list-style-type: none"> Water businesses were previously required to report residential customers by meter size. IPART removed this requirement in the latest version of the AIR as it does not reflect the current price structures and billing arrangements (residential customers are all deemed 20mm meters), therefore the data is not needed by IPART to calculate prices. Following the above logic, is it necessary for water businesses to report non-residential customers by property type? As non-residential customers are billed by meter size, rather than property type, it would appear that this data requirement could be removed. We do not report these numbers for any other purpose. IPART has removed a section under wastewater – 'non-residential wastewater billable connections 20mm meter equivalents at 100% DF'. This section was recently added in consultation with IPART to calculate the exact numbers that IPART uses to derive charges – including the adjustment for minimum sewer service charge. Is it necessary to delete this reporting item?
Non-financial	Table 1.5 – Wastewater Collection and Treatment	Billable sewage volumes (i.e. volumes on which a usage charge is levied excluding 'discharge allowance')	Residential	We note that this is zero for residential customers, as all of the billable wastewater volume is billed as a deemed allowance. We assume that this row has been retained from the Essential Services Commission information return for Victorian water businesses for ease of comparison (as some of those businesses have explicit wastewater usage charges for residential customers).

Worksheet	Table	Heading	Row label or reference	Hunter Water questions/comments
Non-financial	Table 1.6 – Operating Statistics	Wastewater	Total treatment capacity	<p>Does this refer to the design treatment capacity of plants rather than the flow that is treated each year? Does it include or exclude ‘wet weather bypasses’? These are circumstances where some of the flow during heavy rain goes through some processes at the start of the treatment plant and some at the end (e.g. disinfection) but is allowed to bypass the middle processes.</p> <p>We would be able to provide more input as to an appropriate definition if IPART is able to clarify how it intends to use the information.</p>
			Total licensed capacity	<p>Does this refer to permitted volumes for each discharge point on each of Hunter Water’s Environmental Protection Licences in total? Not all discharge points have a discharge volume specified. Does it include or exclude provisions in the EPLs for ‘wet weather bypasses’?</p> <p>We would be able to provide more input as to an appropriate definition if IPART is able to clarify how it intends to use the information.</p>
Non-financial	Table 1.6 – Operating Statistics	Water	Total operating storage capacity	<p>We assume this bulk raw water storage capacity only and does not include the water within the network, such as in reservoirs (large storage tanks). We could provide advice on an appropriate definition or interpretation if IPART is able to clarify how it intends to use the information.</p> <p>In the absence of further clarification, we would provide data consistent with that already reported publicly in our annual Compliance and Performance report (a requirement of Hunter Water’s 2022-2027 Operating Licence) and website. An example is provided below.</p>

Table 1 - Capacity of Hunter Water's water storages

Water Source	Maximum Capacity (ML)
Chichester Dam	18,356
Grahamstown Dam	182,305
Tomago Sandbeds	54,000
Anna Bay Sandbeds	14,537
Total storage	269,198

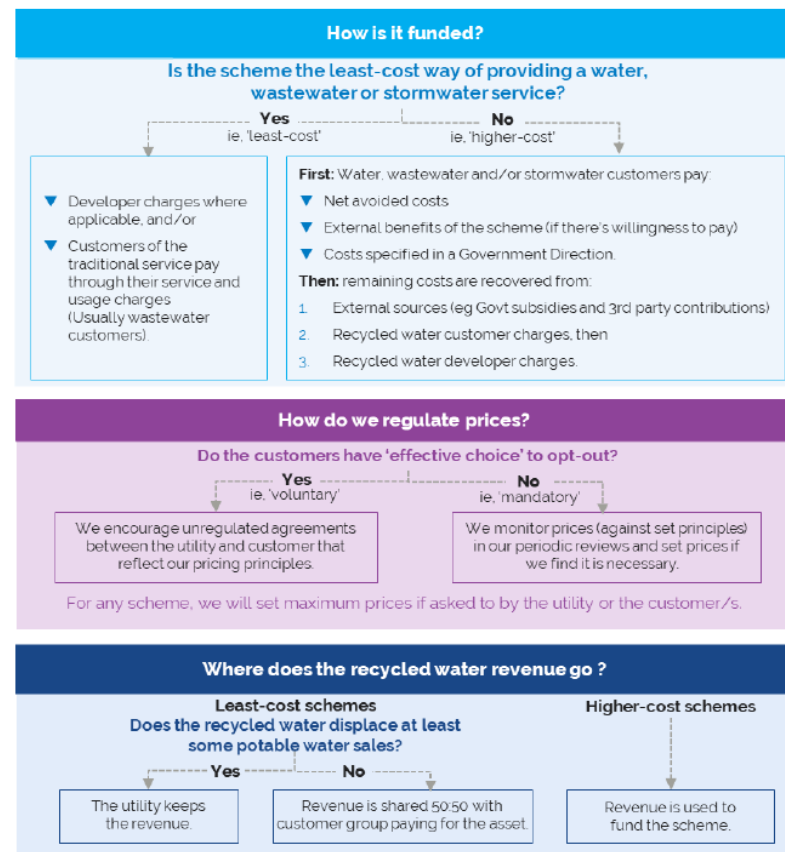
Worksheet	Table	Heading	Row label or reference	Hunter Water questions/comments
Non-financial	Table 1.6 – Operating Statistics	Water	Storage level % at year end	<p>We assume this refer to the total bulk water storage percentage, across all bulk water storages (dams and aquifers), as shown on our website at https://waterstorage.hunterwater.com.au/. See example below.</p> <p>We assume that 'year end' refers to 30 June. Whilst this may appear obvious, a different reporting year term is used for some regulatory reporting purposes. We would be able to provide more input as to an appropriate date if IPART is able to clarify how it intends to use the information.</p>
				
			Maximum day's demand	<p>Does this refer to <i>actual</i> maximum daily demand within the reporting year rather than the theoretical based on multiple reporting years? E.g. The maximum daily demand recorded over many years would be the peak day demand.</p> <p>We would be able to provide more input as to an appropriate definition if IPART is able to clarify how it intends to use the information.</p>
			Average day's demand	<p>Does this refer to <i>actual</i> average daily demand within the reporting year or theoretical based on longer term averages across multiple years?</p>

Worksheet	Table	Heading	Row label or reference	Hunter Water questions/comments
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Recycled water & RH
 Table 8.1 Recycled Water Expenditure and Revenue

It may be useful to clarify whether this includes 'least cost' and 'higher cost' schemes (in below extract from IPART's final report for Hunter Water 2020, Figure 12.1, p 138).

Figure 12.1 Key elements of IPART pricing arrangements for recycled water



Source: Based on IPART, *Review of pricing arrangements for recycled water and related services*, 1 July 2019.

Worksheet	Table	Heading	Row label or reference	Hunter Water questions/comments
Recycled water & RH	Table 8.1 Recycled Water Expenditure and Revenue	Revenue		During the 2019-20 price review, IPART asked for information on which recycled water schemes (and revenues) displace at least some potable water sales, so that it could apply the revenue sharing rules shown above. Would it be useful for IPART for water businesses to split the revenue into the three different components shown at the bottom of the diagram above?
	Table 8.2 Recycled Water Non-Financial Data (excluding 16A related)			We assume that IPART only wants to collect this data for higher cost, mandatory schemes.
SIR Capex 2b SIR Capex 2c				<p>Hunter Water understands, from the discussion at the workshop on 30 January 2023, that IPART unintentionally used similar terminology for the “Capex Major” worksheet (for discreet major projects that enter the RAB once commissioned) and ‘major projects’ in the SIR. That is, ‘major projects’ in the SIR is intended to record information on a different (larger) set of projects.</p> <p>Does IPART have a preferred threshold to be used by utilities to classify projects as ‘major’? Is the adoption of the use of NSW Treasury’s definition of ‘major project’ (>\$50M) appropriate?</p>