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WAMC public hearing responses

How are WAMC agencies delivering services efficiently and prioritising?

Efficiencies 2021-25

- We implemented the Roles and Responsibilities Agreement (RRA) which sets out how the department, WaterNSW and NRAR work together to efficiently and effectively deliver WAMC services, and to ensure no duplication of services.
- As identified in IPART’s final report for its 2021 determination, we undertook a review of licensing functions to avoid duplication and inefficiencies.
 - WAMC transferred all NRAR’s licensing functions to the department, reducing the number of WAMC agencies involved in licensing processes and avoiding the risk of conflicts of interest for NRAR in its compliance activities.
 - WAMC implemented the \$14.7 million Water Licensing and Improvement Program with processing efficiencies for specific transactions realised by the department.
- NRAR has taken a risk-based and outcomes-focused approach to regulation ensuring resources are used efficiently and have the greatest impact.
- Over the past 2 years WaterNSW has permanently removed \$19.7 million of operational expenditure from the entire business. Of this, \$17.8 million was specifically against core

(regulated operating expenditure) activities. This reduction was against a baseline target set in 2022 of \$21.6 million.

Efficiency strategy 2025-30

- The WAMC Efficiency Strategy sets out efficiency improvements to be delivered over the 2025 determination period. The strategy includes joint initiatives across the 3 agencies as well as initiatives to be delivered within each agency.
- The strategy will result in WAMC's average annual costs over the price determination period being \$32.8 million lower than the expenditure in 2023-24.
- WAMC proposes to invest in a technology roadmap that will result in \$20 million in financial savings over 10 years and \$119 million in economic benefits.
- Refer to [Attachment H – WAMC Efficiency Strategy](#) for more information.

Prioritising WAMC services

- WAMC will focus on delivering core statutory requirements in the 2026-30 period and propose recovering these costs through WAMC prices. This includes reviewing, replacing, amending or extending water sharing plans and floodplain management plans to meet statutory deadlines.
- While WAMC must deliver its statutory obligations, during our engagement on WAMC's pricing proposal, we sought to understand customer priorities for water management. These directly informed the long-term outcomes we aim to deliver and report on over the pricing period.
- Customer preferences for investing in 9 discretionary projects were most clearly reflected in the WAMC proposal. Our proposal reflects customer preferences expressed during the engagement to 'do nothing', 'do something' or 'do a lot' to implement these activities.
- For 2 of the 9 programs of work, we propose to invest more than customers indicated based on criteria in our decision-making framework, which we communicated during the engagement (given that the projects would not be fit for purpose at preferred investment levels).

How are costs shared between water users and Government?

- IPART uses the impactor pays principle to determine who and how much customers and Government should pay of WAMC's water management costs. This is in line with the [National Water Initiative pricing principles](#). Impactor pays means whoever creates the need to incur the costs should pay for it. Without extractive water use, we would not need to incur most water management costs.
- Under the current 2.5% per year price cap, water licence holders paid 53% of WAMC costs on average per year and Government paid 47%. (This is not including additional State and Commonwealth WAMC funding. If that additional funding is included, then water licence holders paid 32% of WAMC costs on average).
- The amount water users and Government pay in the next determination period will depend on IPART's determination of WAMC's efficient costs and maximum prices.

- We will need to operate within the envelope IPART decides as we do not anticipate there will be additional Government funding available to subsidise customers – but there is a commitment that users would pay 42% of proposed costs over the period.

Explain the overall price increases, especially the operating increases.

Including WAMC's Efficiency Strategy, the total revenue required to recover WAMC's costs across the 2025 determination period is **\$176.6 million**. This is significantly higher than the revenue allowed in IPART's current determination. However, on average, operating expenditure over the 2025 determination period is forecast to be about 15% less than WAMC's actual operating expenditure in 2023-24 (including MDBA and BRC).

Our proposal reflects increased costs of water management to meet WAMC's statutory obligations, stakeholder expectations and to deliver on the NSW Government's commitments and reforms, including the need to:

- review, replace, amend or extend more water sharing plans and floodplain management plans to meet statutory deadlines.
 - Over the 2025 determination period, we will be required to replace 40 plans, amend 39 plans, extend 21 plans, review 37 plans and audit 18 plans. This is more than 5 times the number of planning activities covered by the previous price proposal.
 - The scope and complexity of plans will also be greater as we incorporate climate change impacts and respond to external reviews
- review and improve the water sharing plan implementation program and establish the floodplain management plan implementation program
- develop and maintain data products to enable a risk-based approach to water management that takes into account the condition and ecological value of rivers, floodplains and wetlands, meeting the expectations of the Natural Resources Commission (NRC) and other stakeholders for evidence-based water management decision making
- expand the groundwater quality monitoring program across NSW, to allow sustainable management of groundwater resources and ensure compliance with the Water Management Act 2000 (the Act) and the NSW Groundwater Strategy
- implement the non-urban metering program, including ensuring systems and processes for metering and floodplain measurement remain fit for purpose
- improve data collection and analysis to comprehensively evaluate water plan performance in meeting their environmental, social and economic objectives, as required by the Act

- implement water strategies and policies and respond to recommendations of the NRC.
- better reflect the operating and maintenance costs of water management works and assets, including for surface and groundwater monitoring
- improve the management of environmental water, including addressing the recommendations of a range of reviews; addressing ongoing implementation and adaptive management requirements for environmental water as part of the Northern Basin Toolkit program; operating and implementing the Sustainable Diversion Limits Adjustment Mechanism (SDLAM) Acceleration Projects; reviewing and implementing active management rules; and reviewing and improving water accounting arrangements
- undertake more compliance education, outreach and visible ‘on-the-ground’ activity, in response to the needs of the community and new rules and regulation (e.g. the need to monitor and enforce compliance with the non-urban metering policy)

We are also proposing to invest \$47.7 million (direct WAMC costs) in a sector-wide technology roadmap that will accurate data and information to support efficient deployment of limited compliance and deliver 4 digital business improvement strategies that build on and leverage investments in the current period. The roadmap will result in \$20 million in financial savings over 10 years and \$119 million in economic benefits.

Is WAMC proposing any changes to price control?

- We propose managing the transition to full cost recovery over time because water management prices are currently below full cost recovery.
- The proposed price increases that strike a reasonable balance between the key considerations of customers and the constraints of the state budget, mitigating impacts on customers (managing price shocks).
- The decision to maintain the 2.5% per year price cap (before inflation) on water management prices for small customers (paying the minimum annual charge) was based on customer preferences and the need to protect small customers given that the smallest 50% of licenses hold 1% of entitlements.
- We consider that a 15% per year, plus inflation, cap on WAMC’s water management charges is reasonable for users with larger entitlements because our analysis indicates these businesses generally have greater tolerance for price increases and can therefore transition at a faster pace to cost-reflective prices.
- Over the current determination period, there have been consistently high levels of water availability and strong profitability across key industry sectors, as described in Chapter 10.

- Immediately increasing prices to recover the full customer share of WAMC's costs could cause price shocks to customers **as bills would need to rise by between 81% and 857% in a short period of time.**

What are the drivers for valley price increases?

To determine prices that reflect the costs of water management, IPART allocates costs and determines prices based on water source type (regulated rivers, unregulated rivers and groundwater) and location (valley or area).

WAMC allocates costs between valleys using cost drivers. Cost drivers are designed to distribute the cost across water sources and valleys based on the drivers of those costs or where the costs are incurred. Some costs are directly attributed to some valleys (like MDBA and BRC costs), however WAMC's water management costs are split between all valleys. This means that most increases in WAMC costs are shared amongst all valleys using cost drivers, unless they can be attributed to specific valleys. Examples of cost drivers that indicate the water management effort needed include: number of licences, volume of entitlement, amount of water taken and number of monitoring stations in a valley.

What are the drivers of the Murray valley costs?

WAMC's costs are shared amongst all valleys based on the cost driver (e.g. number of licences, volume of entitlement, etc.) for each activity. The Murray valley has historically paid a larger proportion of WAMC costs due to the large number of entitlements and customers. As WAMC costs increase the Murray Valley prices will also increase in line with the cost drivers (as will all other valleys). However, the Murray Valley also pays a large proportion of MDBA costs that are recovered through WAMC. These have also increased since the last IPART determination in 2021.

Water users overwhelmingly do the right thing and are compliant

NRAR agrees that customers are compliant and it's the complex rules that make it difficult to comply.

NRAR is a risk-based regulator that has optimised how it gathers leads through intelligence and public reporting. Whilst we recognise that most water users are trying to do the right thing, we still find non-compliance wherever we look:

- In the North, East, South, and West; inland and on the coast,
- In regulated and unregulated systems, as well as in groundwater and surface water systems.

Outputs such as formal warnings, official cautions, directions, enforceable undertakings, and advisory letters in 2024 are the highest recorded. It is also important to consider the significant percentage of the community who believe water theft occurs and that more needs to be done.

Among those who describe themselves as 'aware' in our 2024 community survey, we see:

- 81% believe water theft is still ongoing in NSW,
- 88% believe that more needs to be done to address the issue

How has NRAR shared costs between government and users?

A healthy compliance regime benefits everyone and ensures the integrity of production supply chains.

It is for the Government and IPART to comment on the appropriateness of customers' views and willingness to pay for services. IPART reviewed this matter in 2019 and confirmed that compliance management should be 100% funded by water users, consistent with the NWI's impactor pays principle.

NRAR's 2024 business case seeks to recover only the costs associated with WAMC activities and has excluded compliance costs where WAMC customers are not the identifiable impactors. These excluded activities include costs for enforcing controlled activity approvals on waterfront land and costs for activities utilised for identifying unlicensed water take.

Note that, while the compliance cost share is intended to be 100% impactor pays, currently, customers contribute only around 12%, with the remainder funded by Treasury on behalf of taxpayers.

Why are metering costs increasing?

The 2021 determination assumed compliance with the non-urban metering framework by deadlines in 2024. This has not been realised. One of the main obstacles to water users becoming compliant has been a shortage of duly qualified persons (DQPs) to install and validate metering equipment.

In June 2023 the Minister for Water announced a review of the metering rules because compliance levels were insufficient and implementation was proceeding at a rate that meant full compliance would not be achieved until after 2040.

The non-urban metering review has been completed and WAMC is implementing the review recommendations. The recommended changes result in achieving an acceptable level of compliance faster with the reform objectives, lower costs of metering for small users and creation of a simpler overall system, relative to the previous policy setting. The changes to the metering framework aim to ensure 95% of licensed water take in NSW is measured, recorded and reported by December 2026, if not sooner.

To implement the non-urban metering recommendations by the 2026 deadline, costs will have to increase. Some costs to WaterNSW will be recovered via metering charges. The Department will also incur costs with implementing the new policy and NRAR will incur costs for compliance activities.

What is the analysis that shows larger water users can pay 15%?

Our analysis indicates that farm profits are generally positively correlated to farm size, which suggests that larger customers generally have a greater capacity to pay than smaller customers.

For example:

- the largest 60% of farm businesses in Australia produced a profit

- the largest decile of Australian farms generated an average \$1.6 million in profit, which is more than 3 times the amount the next-largest decile generated, of just under \$500,000
- while the largest 6 deciles made a profit, the smallest 4 deciles generated losses.

It should be noted that this relationship is enduring. Over the last 10 years the largest quintile of NSW cropping farms has outperformed the smallest significantly. While the 2021–22 business profit survey data is accessible in 10 groupings, deciles, the time-series of the cropping farm business profit in NSW is only available in 5 groupings, quintiles. These quintiles are the smallest 20% (quintile 1) through to the largest 20% (quintile 5) of cropping farms.

Refer to Chapter 10 of the [WAMC pricing proposal](#) for more information.

Why is the Government share dropping from 31% to 22%?

In combination, our proposal would mean that NSW Government pays for 58% of WAMC's forecast efficient costs over the 2025 determination period.

Applying the impactor pays principle to our proposal, the proposed NSW Government's notional share of WAMC's forecast efficient costs for the 2025 determination period is 21%. However, due to our proposal to cap price increases below cost-reflective levels, the actual level of the NSW Government's share of WAMC's forecast efficient costs over the 2025 determination period would be significantly higher than this, at 58%.

This means that if IPART accepts WAMC's proposal then customers' actual share of WAMC's costs is expected to be 42%, assuming that the NSW Government fully funds the difference between customers' notional share of WAMC's costs (79%) and customers' actual share of WAMC's costs recovered from prices under our proposal (42%).

The NSW Government's actual share of WAMC's costs over the current period has also been higher than envisaged in IPART's 2021 determination of WAMC's prices because WAMC's actual expenditure has been higher than IPART's assumed expenditure allowances over the current period and this difference has been funded by the NSW Government. The NSW Government's actual contribution to WAMC's costs is borne by NSW taxpayers.

Why should users pay for climate change?

Our proposal is that the NSW Government should pay for an increasing share of costs to mitigate climate change.

Our proposal is to increase the NSW Government share of the costs reflective of the additional work being undertaken to mitigate the consequences of climate change, which we argue should be borne by Government on behalf of the broader community. The proposal is for the customer share of these costs to decline from 60% to 50%.

Climate change represents an intergenerational issue for all NSW residents (current and future) and management of its effects needs to take place regardless of consumptive water use. The impactors

(those who created the need to understand and address the impacts of climate change) are broader than water users and therefore these costs should be funded by Government.

What are costs of water market reforms in the WAMC proposal?

The Commonwealth reform agenda, including the water market reforms are covered by a Federation Funding Agreement. WaterNSW are in the process of quantifying costs to deliver on the Key Performance Indicators (KPIs) associated with the reforms and have provided initial estimates to NSW DCCEEW as part of this process.

Yet to be undertaken is a discussion between NSW DCCEEW, WaterNSW and other involved agencies on consolidating total NSW costs and then providing those to the Commonwealth for discussion. As such, final available funding is uncertain at this point.

WaterNSW understands the total funding available to be \$24m. However, costs are likely to be greater than available funding. Therefore, a further round of negotiation on final KPIs, work required and associated funding will be required over the coming months.

Are we expecting same rates of compliance moving forward?

The incidence of alleged widespread theft no longer occurs.

However, more work needs to be done to lift the compliance rate in a range of areas including non-compliant works taking water or unauthorised flood works that have existed for decades.

As a modern regulator, NRAR adopts best practices to fulfil its statutory obligations and maintain community confidence in the enforcement of laws. Through direct engagement and community surveys, NRAR consistently hears a public expectation for a higher level of compliance.

How has engagement informed the proposal and prioritised work?

WAMC agencies have engaged extensively with stakeholders over the last 18 months, which helped us identify and test priorities for water management, possible price caps, and service levels and investment for some activities. This valuable feedback helped shape the pricing submission, which proposes the most cost-effective ways to deliver those key services.

We used what we heard through the engagement to inform our pricing proposal – outcomes, price caps and investment in some key programs. Priorities identified and tested through engagement informed the outcomes and objectives WAMC will aim to achieve and will report publicly each year on performance.

Engagement with customers and the community directly influenced investments in some programs to improve service quality for the 2025 determination period. In the October 2023 customer working group meetings, the recommended level of expenditure in 9 WAMC investment proposals was tested and feedback sought, as reflected in the table below. Across the 9 areas, participants mainly supported a ‘do something’ level of expenditure. However, there was also a proportion of participants who supported the investment level option to ‘make all’ improvements.

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WAMC reported back on the proposed online customer service improvements and described to participants the approach that WAMC agencies would apply to arrive at final decisions about what would be included in the final proposal to IPART. The customer working groups discussed the decision-making approach that WAMC would apply, including the need to consider the following issues:

- What we are required to do by law (e.g. safety, some environmental initiatives, security)
- What customers have told us
- What level of risk do we adopt?
- What is affordable to customers?
- The timeliness of works – what must we do now and what can we reasonably do later?
- Balancing customer benefit with community benefit – delivering on both
- Planning for the future – including emerging risks we must address (e.g. cyber security)
- The activity or program needs to do its job – be fit for purpose
- The working group’s feedback on these proposals

As illustrated in **Table 1** below, the level of investment included in the WAMC proposal broadly aligns with the expressed preferences of customers ‘to do something’, with two exceptions. WAMC’s reasons for proposing a higher level of investment were explained to participants in the Working Groups and this level of investment above the level that was most supported by customers applied the criteria for decision-making that was shared with participants.

Table 1: Customers’ preference for level of investment compared with proposed WAMC investment cost

Relevant WAMC service or activity	Proposed investment tested in engagement	Customers’ preference for level of investment	Proposed WAMC investment cost	What WAMC proposal’s investment will deliver
Water monitoring (WaterNSW)	Specialised equipment to improve safety: Continued investment in specialised equipment and remote sensing devices to improve workforce safety and deliver operational efficiency.	We do something - \$1 million (capital expenditure)	We do something - \$1 million (capital expenditure)	Capturing water data involves extensive travel and working in hazardous conditions for staff. This investment will support reduced staff travel, including in potentially hazardous conditions, whilst also supporting improved availability of water data.
Water monitoring	Protection of our equipment during flood	We do something -	We do something -	Access to water data (availability and quantity) at

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Relevant WAMC service or activity	Proposed investment tested in engagement	Customers' preference for level of investment	Proposed WAMC investment cost	What WAMC proposal's investment will deliver
(WaterNSW)	or fire: Improvements to high priority water monitoring infrastructure.	\$5 million (capital expenditure)	\$5 million (capital expenditure)	certain times can be critical. This investment means infrastructure can remain in extreme flood or fire events, maintaining access to water data when needed most.
Water monitoring (WaterNSW)	Increasing the extent of our water monitoring network: Ongoing operational funding to ensure maintenance of additional monitoring sites funded by Water Group, and to increase the capability of existing monitoring sites.	We do something at no extra cost	Maintain new, additional sites - \$5.75 million (operational expenditure)	Capital funding was provided by the department for extra monitoring sites and increased capability of existing sites across rural NSW. This operational funding will support the maintenance of these sites.
Water monitoring (WaterNSW)	New water storage information: Develop and deliver a program of works to undertake surveys on priority unregulated weirs in far Western NSW to improve water storage information.	We do something - \$300,000	We do something - \$375,000	Surveys of unregulated weirs that support supply of critical town water needs in the State's far west will ensure we have updated water storage information for water security and drought planning.

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Relevant WAMC service or activity	Proposed investment tested in engagement	Customers' preference for level of investment	Proposed WAMC investment cost	What WAMC proposal's investment will deliver
Water metering and data management (WaterNSW)	Improving water metering and data management: Improvements to how we manage and process water meter data.	We do something - \$5 million (capital expenditure)	We do something - \$7 million	This investment will align multiple systems, improve data quality, improve functionality for customers and meter installers, and ensure system capabilities support customers to meet their obligations.
Groundwater management (WaterNSW)	Managing groundwater boreholes: Refurbishment of the highest priority groundwater bores of the total 4,500 managed in NSW.	We do something - \$12.5 million	We do something - \$12 million (capital expenditure)	Groundwater monitoring is delivered by WaterNSW for the department. WaterNSW's condition assessment has identified the highest priority bores to be refurbished through this investment.
Customer service (WaterNSW)	Improving our online customer experience: Improvement of online customer experience through Water Market Systems (Customer Portal) enhancements.	Do something - \$15 million	We do a lot - \$22.9 million (consistent with the method for decisions that was shared in engagement, this was reported back to customers in the engagement process)	This investment will support continued, easier online customer experiences and will provide more customer transactions online, faster processing, increase customer insights into water account balances and use, and provide 'anytime' customer access.
Data management (Department)	Improving how we store and manage data (one platform instead of three)	We do something \$4 million over 5 years	We do a lot \$15.3 million over 5 years (consistent with the method for decisions that was	This investment will support a coordinated effort to bring together data platforms such as licensing, usage and data. It improves customer experience

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Relevant WAMC service or activity	Proposed investment tested in engagement	Customers' preference for level of investment	Proposed WAMC investment cost	What WAMC proposal's investment will deliver
			shared in engagement, this was reported back to customers in the engagement process)	for WAVE and Water licensing customers.
Engagement on water management plans and strategies (Department)	Customer engagement on water management and planning: Engagement with customers, stakeholders, and community to shape the water management plans we must deliver, in a cost effective, efficient way that delivers long term value.	Do something - Around \$7.5 million over 5 years or \$1.5 million per year, based on 30 water management strategies	We do a lot *\$10.4m over 5 years	Given the proposed caps on WAMC price increases, only around 30% of this cost would be paid by customers. This investment will support efficient, targeted local engagement on the more than 30 water management plans to be delivered in the next determination period, including through a mix of online and in-person engagement activities, regional media advertising to ensure local participation, and research activities to ensure voices of the wider community are also reached.

WAMC is proposing levels of expenditure above the level preferred by participants for two digital business improvement strategies: 'improving way we store and manage data (one data platform across the agencies instead of three)' and 'improve our online customer experience (using a new portal)'. This is because, when the decision-making approach was applied, WAMC agencies realised we could not provide fit-for-service activities at the 'do something' level of investment.

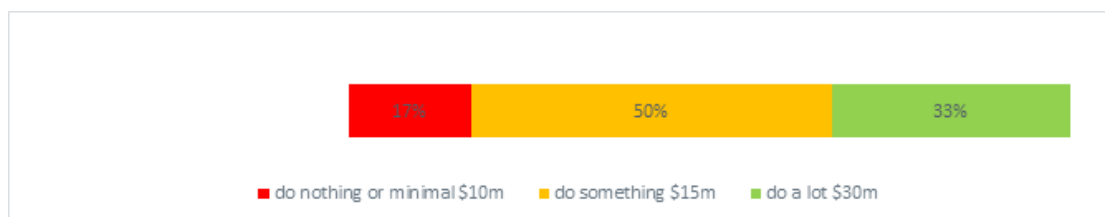
Key factors were drawn out for participants as WAMC's reasons for proposing a higher level of investment:

- The proposed level of 'improve our online customer experience' was put in the context of the level of investments required to deliver customer benefits that were already made over the 2020–2025 period. This was to illustrate that the lower level would not realise customers' service

expectations – namely, that WaterNSW had already invested around \$25 million in 2020–2025 and the NSW Government had also invested \$14.7 million.

- The proposed level of investment was put in the context of a more detailed picture of the different levels of investment supported by customers. Specifically, while 50% of participants had supported the ‘do something’ level of investment, 33% of participants had supported the ‘do a lot’ level in the water working group.

Figure 1: Final customer choice for ‘improve our online customer experience’ investment



- Sharing of the conclusion about the detailed efforts by WAMC teams to respond to the customers’ challenge that the lower level of investment would result in higher ongoing costs for legacy systems, and hence was not a good investment. In reporting back to participants, WAMC agencies reported on findings of our review of:
 - timeliness of works, specifically the challenge of what we can reasonably defer to the next period 2030–2035, with the finding that a deferral was likely to be counterproductive
 - the scope of the program, specifically the challenge of what was the minimum level needed to do its job, with the finding that on review it was determined that the minimum costs to comply with regulatory and legislative requirements (cyber security, critical infrastructure legislation, data management and privacy) were not \$4m over the 5 year regulatory period but \$15.3m
 - the initial accuracy of cost estimates. It was reported back to customers that an investment of \$4m would in fact be a reduction on the current performance and that \$15.3m was the minimum viable cost to maintain current outcomes.

We communicated to customers that we appreciate that this is a considerable investment, however, it would deliver significant value to customers who would see and feel the benefits of these improvements every day. At the time of reporting back to customers, the investment was \$27.5 million to improve our online customer experience. Through further efforts to contain costs, the proposal submitted to IPART has reduced this to \$22.9 million. Refer to [Attachment D – WAMC Customer Engagement Outcomes Report](#) for more information.

Why should customers pay for the implementation of policy?

Costs are allocated to customers based on the impactor pays principle, those who create the need for the service pay for the cost of the service. Activities that WAMC charges for are based on the [National Water Initiative pricing principles](#). These principles set out what water management activities WAMC charges to customers.

Customers do not pay for the development of water management policies, however when they are implemented the impactors pay this cost because they created the need for Government intervention.

How much are customers paying for corporate services?

Proposed corporate services as a proportion of the total WAMC Notional Revenue Requirement (NRR) are slightly lower than in the current 2021 WAMC determination (i.e. 16% of total NRR, versus 18%).

This 16% level is consistent with actual levels of overhead expenditure (15% of total NRR). It is also relatively close to comparable efficiency benchmarks, noting the analysis conducted by IPART's expenditure consultant during the 2016 IPART WAMC price review. At that time, Synergies benchmarked WAMC's overheads, then around 20% of total costs (using a PwC report on federal and state government agencies) in comparison with 7% to 14% for its peer group.

Refer to [Attachment G – WAMC overheads](#) for more information.