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Date of submission: Wednesday, 15 April 2020

Submission: From: Douglas McCloskey [REDACTED]

Sent: Wednesday, 15 April 2020 3:29 PM

To: Sheridan Rapmund

Subject: Re: Submission to Hunter Water Draft Report

Hi Sheridan,

Thank you again for assisting in accommodating our submission. Please find attached our submission in PDF form, with a previous letter to IPART (referred to in the submission) attached as an appendix.

Please regard the submission as fit for publication.

If there are any issues or any need for clarification or further follow up, please do not hesitate to contact me at any time.

Many thanks again.

Kind regards

Douglas McCloskey
Policy Officer | Public Interest Advocacy Centre

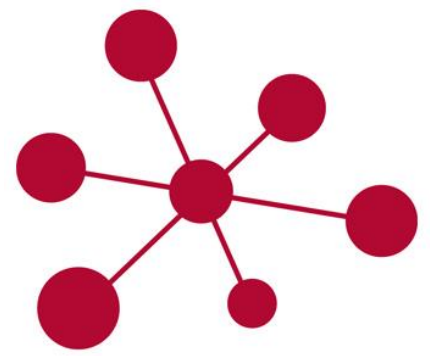
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public interest
ADVOCACY CENTRE

Submission to IPART's Draft Report Review of Prices for Hunter Water Corporation from July 2020

15 April 2020

About the Public Interest Advocacy Centre

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in Sydney.

Established in 1982, PIAC tackles barriers to justice and fairness experienced by people who are vulnerable or facing disadvantage. We ensure basic rights are enjoyed across the community through legal assistance and strategic litigation, public policy development, communication and training.

Energy and Water Consumers' Advocacy Program

The Energy and Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in New South Wales. The program develops policy and advocates in the interests of low-income and other residential consumers in the NSW energy and water markets. PIAC receives input from a community-based reference group whose members include:

- NSW Council of Social Service;
- Combined Pensioners and Superannuants Association of NSW;
- Ethnic Communities Council NSW;
- Salvation Army;
- Physical Disability Council NSW;
- Anglicare;
- Good Shepherd Microfinance;
- Financial Rights Legal Centre;
- Affiliated Residential Park Residents Association NSW;
- Tenants Union;
- The Sydney Alliance; and
- Mission Australia.

Contact

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Public Interest Advocacy Centre



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The Public Interest Advocacy Centre office is located on the land of the Gadigal of the Eora Nation.

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1. Introduction

The Public Interest Advocacy Centre (PIAC) welcomes the opportunity to respond to the Independent Pricing and Regulatory Tribunal's (IPART's) *Review of prices for Hunter Water Corporation from July 2020* Draft Determination, and is broadly supportive of the positions adopted.

We support the ongoing transition to pricing based on volumetric household water usage, which reflects the preference for greater control of their own costs that is consistently expressed by consumers. Significant scope exists to progress this transition further, particularly in relation to charges for wastewater. While the rebalance to water usage charges is a welcome recognition of community preferences, we do not believe that retaining a flat-tariff structure fully reflects the need to balance economic efficiency, equity and fairness with an incentive to conserve. PIAC reiterates our recommendation that more comprehensive reform of pricing is needed. As an important part of this, a two-part inclining block tariff structure would provide a more equitable and effective means of recovering costs in a way that gives a clear incentive for conservation and efficiency.

In the remainder of this submission we detail these specific elements of the draft determination and other relevant issues.

2. General principles

PIAC reiterates our support for a two-part tariff structure for urban water utilities. Climate change, as well as recent intense and prolonged drought, highlights the increasing unreliability of water resources. Storages deplete much more rapidly than predicted, and long-term average inflows and yields cannot be relied upon. Projected population growth in the Hunter will increase the burden upon existing water sources, and multiply the risk that the changing climate will result in scarcity, and negatively impact access to water essential for the community. We recommend initiating a comprehensive review of pricing principles and structures for all water services at the completion of this regulatory determination.

2.1 Two-part tariffs.

PIAC recommends the reimplementing of a two-part tariff structure for Hunter Water. We note this structure was previously applied to Sydney Water, and was previously recognised by IPART as the most appropriate means of balancing pricing efficiency with the wider roles that water pricing must fulfil. Indeed, in its own review into price structures intended to reduce demand in 2004, IPART¹ found two-part tariffs:

- send a strong signal about the need to conserve water that particularly targets high water users, by targeting the 'discretionary' proportion of consumption that is more responsive to price
- can be set at a level that minimises the number of customers who are required to pay the higher Tier 2 usage charge for efficient or non-discretionary (essential) water use
- have considerable potential to reduce demand

¹ IPART. ['Investigation into price structures to reduce the demand for water in the Sydney Basin – final report'](#) July 2004

- minimise impact on vulnerable customers
- are easy to understand, implement and administer.

In addition, we highlight two-part tariffs more strongly align with the consistently expressed consumer preferences that basic essential water needs are affordable for all in the community, and those with higher usage pay higher costs.

Well-designed two-part tariffs also provide a consistent, long-term price signal that households can respond to, for instance, by making investments that improve efficiency of their usage, or by changing their behaviours in ways that lower usage while maintaining household health and well-being.

PIAC strongly supports the consistent implementation of two-part tariffs across the regulated water utilities. Appendix A provides previous correspondence with IPART in support of the implementation of a two-part tariff structure by Sydney Water. We consider these principles to be applicable to Hunter Water.

2.2 Community preferences

PIAC has consistently and strongly supported the need for meaningful ongoing engagement with the community to be integrated into business investment, planning and pricing decision making.

We acknowledge the improved performance of Hunter Water in seeking to identify its community stakeholders. The processes undertaken as part of this regulatory proposal sought direct input on community preferences regarding potential 'discretionary' projects, and the willingness of the community to bear the costs of these projects. PIAC agrees that, in the context of this proposal, and the nature and materiality of the projects in question, the engagement undertaken is a reasonable basis for proceeding with the projects at this time.

However, we note that the consultant's report by Gillespies raised a number of issues with the willingness to pay (WTP) processes undertaken by Hunter Water, and whether they meet the standards set by IPART in its guidelines for engagement. While PIAC agrees that the identified projects can be approved on the basis of the engagement undertaken, we highlight the significant room for ongoing improvement in the rigour and depth of consultation.

Beyond the issues identified by the Gillespies report, PIAC contends that the process and structure of engagement is crucial, and that surveys and more limited traditional focus-groups sessions are not sufficient or appropriate for determining consumer preferences with respect to complicated subject matter and change.

Business decisions about investment, pricing structure, pricing levels, and discretionary projects that impact upon them, should be grounded in comprehensive, face-to-face deliberative processes that build consumers' capacity to provide genuinely informed indications of their preferences.

2.3 Rebates consistency

The extreme circumstances arising from the response to the COVID-19 pandemic highlights the need to address the inconsistency and potential inadequacy of water rebates and assistance

measures. Assistance to support access to water services essential for household health and wellbeing is crucial.

Households in NSW, regardless where they live or who provides their essential energy services, can rely upon consistent support and assistance through:

- a range of NSW rebates that are applied consistently to all eligible households
- a range of minimum retailer-provided payment assistance measures that are defined and available to all households experiencing payment difficulty
- access to Emergency Account Payment Assistance (EAPA) for when they are unable to pay bills

While Sydney and Hunter Water each have measures to address the needs of their customers, there is no equivalent consistent framework of assistance for NSW households to support their affordable access to essential water services.

PIAC considers it timely to commence a review of assistance and support measures, with a view to recommending reforms that provide more consistent and effective support to all NSW households, and harmonise the structure and quantum of supports with potential pricing reforms that support efficiency and conservation of water use.

Recommendation

PIAC recommends IPART commence a review of the water rebates, supports and assistance measures available to NSW households.

3. Pricing

3.1 Water usage

PIAC accepts the proposal that the water usage charge remains flat and will rise with inflation. However, as outlined previously, we strongly recommend the implementation of a two-part block tariff structure.

3.2 Wastewater

PIAC supports the continued transition of wastewater service charges to a single consistent charge across houses and apartments. However, we highlight that in engagement with Hunter Water, the community has expressed a strong preference for their bills to be based upon their actual usage, to maximise their control of costs. With the reduction in water service charges, wastewater service charges now represent the most significant fixed costs for Hunter Water customers.

This represents an opportunity to empower Hunter Water customers by transitioning recovery of wastewater related costs from fixed charges to usage-based charges. To this end, PIAC reiterates our recommendation that IPART consider reforms to wastewater charging, including:

- Commencing a transition to the recovery of wastewater service costs primarily through usage-based costs.
- Transitioning wastewater usage costs for all customers (residential and non-residential) to a percent discharge factor of their metered water usage. This discharge factor should recognise the different circumstances of apartments and houses.

Recommendation

PIAC recommends wastewater charging structures be consistently applied across all regulated water businesses, with costs recovered primarily through usage charges based on a percentage discharge factor of metered water usage.

3.3 Discretionary spending

PIAC agrees with IPART's decision to approve the discretionary project expenditure proposed by Hunter Water. While there is significant room for Hunter Water to improve its ongoing community engagement, Hunter Water demonstrated consistent community support for the proposed projects and a willingness by consumers to pay the proposed costs. However, PIAC has two concerns with the detail of the cost recovery proposed in the draft determination. Specifically:

- PIAC contends the nature of the customer base for Hunter Water should be considered in context, with non-residential customers included in the recovery of costs related to the approved projects. Hunter Water undertook a process of engagement with the community, focusing on residential customers where a representative and statistically significant group of community members was possible.

PIAC accepts Hunter Water's perspective that a statistically significant and representative consultation of non-residential customers was attempted, but not possible. While PIAC contends this issue can and should be addressed in the future, we do not agree that the absence of specific consultation of non-residential consumers on the issue of discretionary projects and recovery of their costs is a reasonable basis for excluding them from cost recovery. In PIAC's view a representative and statistically significant group of residential consumers should serve as a reasonable proxy for the Hunter Water customer base in this case, given the nature of the projects in question, and the materiality of the charges involved.

- PIAC strongly disagrees with the levying of a separate, fixed 'discretionary' charge as the mechanism for recovery of the costs related to the approved discretionary projects. Where the expenditure is allowed, the projects should be treated as any other approved projects, with their costs rolled into the total recovered through usage prices. We reiterate our concern that a separate charge adds to potential customer confusion regarding its purpose, particularly if it is described as a 'discretionary spending charge' without the context and understanding of the nature of that discretion. Further, where there is no ability to avoid or mitigate this charge, highlighting its source and purpose does not serve any consumer information purpose. Information regarding the nature, make-up and cost recovery of discretionary projects is important, but is more effectively and appropriately reported in annual reports or other specific processes.

While we understand developing a draft framework for the assessment of discretionary expenditure was necessary to consider the proposed projects, PIAC considers it appropriate that this draft framework should be further developed and implemented subject to a dedicated process of stakeholder engagement.

We strongly recommend that IPART initiate a review of the framework and guidelines for discretionary expenditure at the completion of this determination process, to ensure that the process is robust and able to address the needs and concerns of the community and businesses. PIAC would be happy to work with IPART to develop an appropriate process for this.

Recommendation

PIAC recommends costs related to approved discretionary projects be recovered from the entire Hunter Water customer base.

Recommendation

PIAC recommends charges related to approved discretionary spending be treated as any other approved project-related costs, and recovered through usage charges.

Recommendation

PIAC recommends IPART initiate a review of the framework and guidelines for discretionary expenditure at the completion of this determination process.

3.4 Location-based charging

PIAC strongly supports the removal of location-based charging arrangements. We understand, however, that for individual entities it is possible that the cost increase will be substantial. In order to implement the changes fairly, and mitigate any potential impacts on individual entities, we support a transition that results in the full phase-out of location-based charges by 2024-25.

4. Issues IPART is seeking comment on

4.1 Should Hunter Water include a share of wastewater capital costs in trade waste prices?

Where trade waste services are provided utilising the same infrastructure as those for wastewater service provision, they have a direct impact upon the need for maintenance, replacement and augmentation of that infrastructure. PIAC supports a principle of beneficiary or impactor pays, where, if an entity benefits from a service or piece of infrastructure, or impacts upon the costs of its provision, they should contribute to the payment of those costs. Accordingly, we consider it appropriate that trade waste prices should include an appropriate contribution to wastewater capital costs, proportionate to their impact upon it.

4.2 Would setting differential prices between wastewater catchments, based on the LRMC of supply, be a more appropriate basis for setting high strength prices than the current approach, which is based on operating costs only?

While the economic efficiency and accuracy of cost recovery should be an important consideration in the setting of prices, in the delivery of essential water services, consistency and fairness across the community is also vital. Community engagement consistently finds a preference for prices for the same water and wastewater services to be the same across the community, to the greatest degree possible.

We agree that there is merit in wastewater usage charges that incorporate Long Run Marginal Cost (LRMC), however, we do not consider that it is in line with the community expectation for the resulting usage charge to vary according to location. While the LRMC is likely to vary significantly across the different waste water catchments, it may be possible to formulate an average LRMC across the catchments, to derive a single wastewater usage price similar to that for water usage. We accept that this does not provide a completely accurate cost for discharge of each additional unit of wastewater in each catchment, however it does provide a strong price signal that more closely reflects the cost to Hunter Water of wastewater discharge, and so provides a better basis for assessing and implementing the efficiency of recycling and other diversion alternatives.

While IPART should encourage further examination of this for future determinations, it is unlikely to be practical in the timeframes required for this period. PIAC recommends that implementation of this change be considered as part of the comprehensive review of regulatory and pricing structures for all regulated water utilities.

4.3 Should any trade waste price increases be transitioned to avoid negative effects?

PIAC agrees that, where trade waste prices will increase to more fairly include the impact of trade waste upon waste water infrastructure costs, it may be reasonable to smooth the transition to mitigate any negative impacts.

10 December 2019

Dr Paul Paterson
Chair
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop, Sydney NSW 1240



Dear Paul,

Review of Prices for Sydney Water Corporation from July 2020

As you know, the Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage, and ensure basic rights are enjoyed across the community. PIAC's Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

Following Sydney Water's amended revenue proposal and public hearing, recent discussions with IPART staff regarding pricing and our earlier conversation about implementing consumer preferences in regulatory decisions, we write to express the need for a broader review of water pricing for Sydney Water and request that the Tribunal gives full consideration to reinstating inclining block water tariffs.

A need to transition tariffs

In PIAC's view, a comprehensive review of Sydney Water's pricing, focussing on the integration of pricing with long-term planning and management (beyond the limited scope of 5-year regulatory periods), is required to secure the most efficient and sustainable supply of water.

Principles of allocative, productive, dynamic and social efficiency support water pricing that:

- is cost-reflective, in a beneficiary- or causer-pays sense, based on the long-term costs of building and managing water assets rather than the marginal or year-to-year cost of doing business for Sydney Water. This applies equally to assets on the supply side (including desalination and dams) and the demand side (including signals for investment in water-using appliances, rainwater tanks, gardens, swimming pools and commercial processes),
- reflects community and consumer preferences, particularly those expressed during SW's stakeholder engagement processes, and
- places risk, particularly the risk of water scarcity, with those best placed to manage it. In the case of residential water users, those with a higher demand for discretionary water applications (particularly avoidable and substitutable applications such as gardens and swimming pools) are best place to manage risk.

Affordable access to water is essential for people's health and well-being. PIAC has observed, including in Sydney Water's own community engagement forums, that while individual consumers have a range of views, overall the community expects the following of water pricing:

- Costs related to access to water will be shared fairly within the community.
- Those who are larger users for discretionary purposes (such as gardens and pools) should pay the reasonable costs related to this use and the long-

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term impact it has on the community's sustainable access to the resource. More specifically, the community does not see it as appropriate to socialise the costs of 'luxury' personal water uses, such as pools and large gardens, especially among

- the disadvantaged and vulnerable in the community who have little or no access to these uses,
 - people in apartments who have little or no access to these uses, and
 - people who have undertaken measures to use less water from the water system.
- The burden of the risk of shortages should not be placed on consumers by relying on short-term price spikes that act as punitive imposts.
 - It should promote sustainable use and supply of water to the community by providing clear, ongoing signals of the uncertainty of supply and the risk and costs involved in behaviour that impacts upon the security and sustainability of that supply.
 - It should incentivise supply and re-use solutions that are environmentally sustainable, resource efficient and minimise system costs.

PIAC contends that alongside the initiation of a comprehensive review (undertaken co-operatively with IPART, community stakeholders, urban water businesses, WaterNSW and the NSW Government), there are measures which can, and should, be commenced immediately.

These include

- re-implementing an enduring inclining block tariff, reflecting the above-noted community and consumer preferences and that consistent, transparent pricing signals are needed to support conservation and efficient, informed decisions by consumers,
- ensuring that the fixed charges are not increased, and that any additional charges approved for inclusion during this regulatory period are recovered through usage charges (preferably through the higher second block), and
- moving wastewater cost recovery to a usage basis, with the charge being a deemed proportion of water usage, according to housing type.

Inclining Block tariff (IBT)

IPART's own prior analysis recognises demand is responsive to price. This is particularly the case over the long term, as time is required for price signals to be understood and acted on by consumers¹. IBTs have an established role in providing the basis for such long-term signals to consumers.

PIAC recommends the reimplementation of an IBT structure previously applied to Sydney Water, and previously recognised by IPART as the most appropriate means of balancing pricing efficiency with the wider roles that water pricing must fulfil, by

- sending a price signal aligned with the higher unit cost to supply higher water through the step design (in both the quantity of usage and the value of tariff step),
- supporting the equitable and affordable access to essential water needs of all consumers, with the goal that the costs of supplying 'essential' (not-avoidable and non-substitutable) needs are generally recovered in the first block,
- helping to reduce demand to meet the long-term supply and demand imbalance³. Importantly, the second block provides a clear price signal incentive for people to use less drinking-quality water for water intensive discretionary uses, such as pool and gardens,

¹ IPART 'water scarcity: does it exist and can price help solve the problem' Water – working paper January 2008. P.10-12

³ Prior to the current extreme circumstances, WaterNSW latest update of water system yield for Greater Sydney involved a downward adjustment that, particularly when viewed in conjunction with new connection growth, meant that long term secure supply without desalination would be less

- a price signal in support of the choice to conserve, or pay the full cost of, water intensive discretionary use in the second block.
- helping minimise the exposure of vulnerable customers to higher prices.

Most of these factors were previously recognised by the tribunal in implementing an IBT⁴. Additionally, PIAC strongly recommends IBTs as the most appropriate price structure as

- they are employed by the majority of urban water businesses in Australia, including those with circumstances that are comparable with those faced by Sydney Water,
- they reflect the strong and consistent consumer and community preference, identified by Sydney Water, Hunter Water and IPART, that there be price signals related to higher water use to encourage and support conservation,
- they allow price increases to be limited to a smaller number of consumers, who will generally have a higher capacity to pay and/or reduce their consumption, rather than the whole community. This is both fairer and more politically viable.
- They provide more effective guidance to target assistance to any households unable to address their higher usage and minimising the cohort of consumers unfairly impacted by price increases, such as through family/household rebates, efficiency investment support and rebates for medical use requirements.

Importantly, we do not consider it necessary for Sydney Water to have explicitly expressed support for IBTs to be applied, and view Sydney Water's lack of support for IBTs as a significant failure to reflect preferences expressed to them in their own community and stakeholder engagement.

IPART considers IBTs to be 'less efficient' than the two-part tariff currently employed. In PIAC's view, this appears to represent a narrow view of efficiency, based on a limited interpretation of Long Run Marginal Cost (LRMC), rather than the more appropriate wider application of principles of allocative, productive, dynamic and social efficiency that are appropriate for urban water pricing. The cited limitations in the efficiency of IBTs can be attributed to the poor setting of block quantities and block tariff levels, and are not inherent to an inclining block structure itself, and can be addressed both in the design of the IBT and the supporting framework of policies with which they could ultimately be integrated.

PIAC recommends implementation of a two-tier IBT based loosely on the structure previously implemented by IPART to set in place a pricing foundation that can be built on over coming regulatory periods.

IBT Structure

Considerations

In detailing the assumptions used in its calculation of LRMC of the bulk water component, Sydney Water highlights supply yield has the most impact upon the LRMC, and its variability is a key future risk in a changed climate.

According to its own proposal, however, Sydney Water's LRMC and pricing intends to identify costs that are driven by water use, and exclude costs that are driven by new connections⁶. This approach is focussed on potential costs related to demand changes. That appears to be, at

than required to meet long term demand, notwithstanding extreme circumstances such as those currently being experienced.

⁴ IPART 'water scarcity: does it exist and can price help solve the problem' Water – working paper January 2008. P.6

⁶ Sydney Water price proposal 2020-24 appendix 4C: LRMC p 4

least in part, predicated on assumptions of static supply yield that are, increasingly, inappropriate. In PIAC's view, this needs to better incorporate risks and costs related to:

- Scenarios where demand is static but supply/yield is lower than assumed, and
- Scenarios where demand increases and supply/yield is lower than assumed.

The unreliability and unpredictability of supply yield is increasingly clear in the current drought, as reserves are depleting more rapidly than historic averages (or even other droughts). A permanent pricing signal needs to incorporate this variability and unpredictability, and provide consumers who have high discretionary water use with a choice; to respond by paying for the higher cost to supply them, or use less.

PIAC considers an inclining block, taking into account the long term variability of system yield, is an appropriate basis for incorporating long term scarcity and insecurity of supply into efficient pricing.

- The first block would use a 'base value' system yield assumption, without desalination, to determine a long-run marginal cost-based price. This is likely to be close to (but lower than) the currently determined single tariff LRMC, without costs related to desalination or any drought related costs,
- The 'non-bulk' component of the LRMC could be incorporated into either block (or both), depending upon the relative level of those blocks and the relative usage at which those blocks are triggered. PIAC considers it should be incorporated into the second block, to improve the consistency of the price signal while maintaining the equitable access and fairness supported through the first block.
- The second block would apply system yield assumptions based upon forward looking risk scenarios. This treats the second block as a proxy for a short-term scarcity price that is signalled in advance, so that consumers may see the impact of usage behaviour on the system costs where yield is variable and insecure. In signalling costs in advance, this more clearly links behaviour to costs in a way that can influence behaviour and investment.
- The entire levelised cost of water from Sydney Desalination Plant (SDP) should be recovered via the second block. This reflects that, generally, consumers whose use exceeds that of the first block have a disproportionately high (and, to some extent, avoidable) impact on water storage levels, and provides them a price signal that is permanent, clear and in advance, giving them the best opportunity to make informed decisions, and
- The second block would then be set at less than the full levelised cost of desalination plus the non-bulk' component of the LRMC, at a level dependent on the relative volumes of water from storage and from desalination in the system-wide consumption recovered from this block.

Transition

Re-introduction of the 2-tiered IBT could be approached in a staged manner, to minimise perceived impact while a more comprehensive review and integration of pricing with long-term planning is undertaken. A conservative approach to understanding the distinction between essential and discretionary use could be taken such that it would have limited impact upon households bills in the near term.

The review should seek to better understand an appropriate determination of 'essential' usage which should be set at an affordable price that meets the community's expectations, and understand what use inside the home essential and what is avoidable (for example, where larger households' usage is not intrinsic to their household size, but due to leaks or unexamined usage behaviours which are able to be addressed without unreasonable cost or behaviour change).

The review should also consider the range of supporting measures, programs and investments that would be needed to transition the price structure fully, and address potential equity concerns.

Thank you for taking the time to consider this matter. PIAC would welcome the opportunity to meet with the Tribunal and other stakeholders to discuss these issues in more depth.

Yours sincerely,

Craig Memery
Policy Team Leader, Energy and Water
Public Interest Advocacy Centre



Douglas McCloskey
Policy Officer, Energy and Water
Public Interest Advocacy Centre

