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Date of submission: Thursday, 24 September 2015

Submission: The only issue we see is the access to user split recommended in the report. DPI Water under its best practice guidelines make Councils charge with a 75:25 split between user charges and fixed charges. Under this issues paper, DPI Water suggest that droughts cost have similar operating charges to time with ample water and require 100% fixed charges to operate.

Councils also experience droughts and Goulburn Mulwaree Council have experienced significant periods of drought. The cost of operating during the drought was as high, possibly higher, than non drought times. In saying this, if Councils are expected to operate under a 75:25 split, so should DPI water (as the regulator that expects this from Councils).