



Independent Pricing and Regulation Tribunal
PO BOX K35
Haymarket Post Shop NSW 1240

Sent via email to: ipart@ipart.nsw.gov.au

Cc: [REDACTED]

12 October 2015

Dear Sir/Madam

RE: REVIEW OF PRICES FOR SYDNEY WATER FROM 1 JULY 2016

Thank you for the opportunity to provide comment on the review of prices for Sydney Water from 1 July 2016. The GBCA works with industry and all levels of government to encourage best practice, leadership and innovation and supports policies that encourage more sustainable outcomes for buildings, communities and cities.

The GBCA was established in 2002 to accelerate the transformation of Australia's built environment into one that is healthy, liveable, productive, resilient and sustainable. In 2003, the GBCA released its first Green Star rating tool. Since then, the Green Star rating system has been embraced by industry and government as a method for benchmarking and measuring best practice, as well as a way of recognising and rewarding leadership and innovation in both buildings and precinct and community-scale developments.

Almost 1000 projects have now achieved Green Star certification and amongst these are hundreds of examples of innovation that have led to steady improvements in the 'standard practice' both of industry and government. Many projects have delivered world-leading outcomes in spite of sometimes complicated and contradictory regulations. The GBCA is committed to working with industry and government to identify barriers and accelerate market transformation through ensuring a regulatory and policy environment that encourages innovative solutions and sustainable outcomes.

The GBCA commends the NSW Government's establishment of a competitive water market to encourage the uptake of recycled water innovation and deliver more sustainable water outcomes for businesses and communities. The Metropolitan Water Plan also aims to 'support liveable and resilient urban communities' through a range of measures including encouraging water recycling and efficiency.

The *Water Industry Competition Act 2006 (WICA)* and *Water Competition Amendment (Review) Act 2014*, enable best practice recycled and drinking water schemes, such as those at Central Park, Barangaroo and Green Square, as well as driving infrastructure investment and alleviating capacity constraints on the network.

However, continued investment in designing and implementing innovative solutions relies on a consistent and coordinated approach from all agencies to ensure an acceptable level of certainty and risk for such projects. The GBCA notes that the recent Sydney Water Corporation pricing proposal and the Independent Pricing and Regulatory Tribunal (IPART) position that WICA retailers should be treated as access seekers rather than non-residential customers, will directly impact GBCA members and endanger the viability of existing and proposed projects.

The GBCA urges IPART to consider the implications of both the decision to change the status of non-residential customers to access seekers under the WICA access regime, as well as the proposal that wholesale pricing on retail minus avoidable costs basis be applied until access agreements are established.

The GBCA welcomes the opportunity to work with IPART over the coming months and years to support and accelerate innovative energy and water solutions for buildings, precincts and communities. Please do not hesitate to contact me [REDACTED] should you require any further information regarding the points discussed above.

Yours sincerely

[REDACTED]

Katy Dean
Director – Advocacy