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Submission: 1. The criteria for "Scale and Capacity" are very subjective. To allow Councils to put reasonable cases, please ensure that IPART's final methodology paper quantitates these criteria to the extent that is possible and/or explains what factors IPART will be taking into account in making an assessment against these criteria.

2. Similarly, please ensure that IPART's final methodology paper explains what factors IPART will be taking into account in making an assessment against the additional criteria for "social and community context".

3. The timeline between release of IPART's final methodology ("early" June 2015) and response by Councils (30 June 2015) is far too short. Councils need the opportunity to perform any extra detailed work to respond to any refinements of methodology (particularly the explanatory material about "scale and capacity" criteria). **MOST IMPORTANTLY**, Councils need the opportunity to consult with their communities so that their submissions genuinely reflect the community view. Please negotiate an extension of time for Council responses to the final methodology paper.