

Author name: C. Richardson

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Submission: IPART have detailed on page 30 of the Consultation Paper that they plan to assess the Operating Performance Ratio on the basis that all Councils (except rural councils) must meet the benchmark within 5 years.

It is important to highlight that the Operating Performance Ratio factors in all of the operating expenses including a component for depreciation expense. This component of expenditure is driven by the size of a Council's road network and therefore those Councils including Wagga Wagga with a relatively large rural road network will show a higher number for depreciation expense making it more difficult to achieve the benchmark. Wagga Wagga City Council has a road network in excess of 2,100 km.

Wagga Wagga City Council submits that IPART should change the criteria from "Must meet within 5 years" to "Meet or improve within 5 years".