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16 April 2010

Dr M Keating The Chair Independent Pricing & Regulatory Tribunal PO Box Q2920 QVB Post Office NSW 1230

Dear Dr Keating

Reference is made to IPART's draft determination for bulk water pricing by State Water.

Thank you for the opportunity to put forward this submission.

IPART's draft determination charges to the Upper Hunter Water Alliance are proposed to rise by 4% plus CPI over the three year period.

The table below summarises the impact of the proposed price increases over the three year period based on each individual council's entitlement within the Upper Hunter Water Alliance.

Charges	Upper Hunter Shire Council	Muswellbrook Shire Council	Singleton Shire Council
	Entitlement - 2,000ML	Entitlement - 3800ML	Entitlement - 5,000ML
	(Specific Purpose) and	(Specific Purpose) and	(Specific Purpose) and
	669ML (General Security)	0ML (General Security)	2800 ML (General
	regulated river.	regulated river	Security) regulated river
2008/09	\$89,105	\$91,968	\$109,406
2009/10 (4% increase)	\$92,669	\$103,760	\$113,782
2012/13 (up to 28% increase)	\$118,616	\$132,812	\$145,641
Total increase in charges Over three year period (\$)	\$25,947	\$29,052	\$31,859

The proposed price increase needs to be looked at in context of the current financial and market situations. The alliance needs to substantially increase the treated water charges to its residents in 2010/11 and the subsequent years for the following reasons:

- Energy Australia increase in electricity price by 20% from 1 July 2010.
- The increased cost of capital due to rising interest rates for large scale capital projects.

To meet the above additional expenditures, water charges to residents will need to be increased by approximately 11% in 2010/11. The impact of an additional increase owing to raw water price increase will be significant for the alliance residents.

## A Quality Rural Lifestyle – in a caring and thriving community

The Upper Hunter Water alliance urges IPART to consider the effect of price increase on users and grant an appropriate reduction in the bulk water price increase at the rate pegging level for NSW Councils of 2.6%.

Yours faithfully

For Daryl Dutton

GENERAL MANAGER