

6 August 2021

Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop
Sydney NSW 1240

Thank you for the opportunity to provide our response to the set questions within the Review of the Rate PEG to include Population Growth Draft Report seeking feedback on the following questions -

1. Should our methodology be re-based after the census every five years to reflect actual growth?

- Agree with re-basing the data every 5 (five) years after Census has taken place. It would be preferred the population growth percentage calculation uses data collected on a yearly basis covering the past 12 months making it more relevant than waiting every 5 (five) years to be updated. Information on what category of information (data) will to be included in the calculation is not shared in the draft report. Data used from 12 (twelve) months back from the time the Minister decrees the annual rate PEG, maximum minimum rates, interest on overdue rates, etc would be preferred.

2. In the absence of a true-up, should we impose a materiality threshold to trigger whether an adjustment is needed on a case-by-case basis to reflect actual growth?

- A materiality threshold is a good idea. It will enable Councils to request an adjustment to be included/form part of the yearly estimates to reflect the actual growth in its LGA.

3. Do you have any other comments on our draft methodology or other aspects of this draft report?

- Where an LGA has a reduction in the population growth percentage, the rate peg should accommodate the increase to the cost of service (currently above the reported CPI).

Yours sincerely,



Daryl Jackson
CFO