Ballina Byron Lismore Richmond Valley

Rous Watery

Regional Water Supply



The Manager. Independent Pricing and Regulatory Tribunal PO Box Q290 QVB Post Office NSW 1230.

Attention: Kumar Rasrih

Dear Sir,

Re: Department of Land and Water Conservation Submission on Bulk Water Pricing 200 1/02-2003/04.

I refer to the submission by the *Department of Land and Water Conservation* on Bulk Water Pricing and concerns Council has with the proposal's implementation.

Rous Water is a water supply authority supplying potable water to four constituent Councils on the Far North Coast. Council has one main water supply dam, a smaller auxiliary dam and several groundwater supply bores. In total Council has two unregulated water license and eight groundwater licenses with State Water.

Council's concern with the DLWC submission is that the maximum price increase of 20% per year for three years, as stated throughout the document, is not correct. State Water's current volumetric charge for Council's main water storage is \$0.91/ML plus a \$100 base charge. This dam supplies approximately 12,000 ML per annum. The current license fee for this dam for the 2000-01 period will be approximately \$10,920.00. Under the two-part tariff proposed for unregulated rivers by the DLWC the charge will increase 285% to \$3 1,080.00 (Table 5.3,pp30).

The following figures show the impact the submission has on the license fee for Council's main water supply source based on an annual usage of 12,000ML per annum:

199940\$0.61/ML	\$7,320.00
2000-01 \$0.91/ML (up 49%)	\$10,920.00
introduction of proposed water pricing structure 2001-02 \$1.09/ML plus \$1.50/ML (up 285%) 2002-03 \$1.31/ML plus \$1.80/ML (up 20%) 2003-04 \$1.57/ML plus \$2.16/ML (up 20%)	\$31,080.00 \$37,320.00 \$44,760.00

These figures show that for the initial change to the proposed pricing structure price increases will be far greater than the 20% increase stated in the submission. Therefore, the *Department of Land and Water Conservation* should confirm that the proposed pricing structure does not increase the current license fees by more than 20%.

Should you require any further information regarding this matter it is suggested you contact Mr. David Patch on 662128055.

Yours faithfully,

Wayne Franklin

Operational Services Manager