

E10/1130

The following is an index associated with the information on the history of the Sewer Access Charge since 2002 as implemented by Bathurst Regional Council.

On the pages noted are items that back our claims of corrupt conduct in regard to this matter.

The numbering for this index is at the bottom right hand corner.

2004

Page 9. Estimates used for non-residential properties

At the time of the presentation details of the non-residential group of properties were not available and consequently the figures provided were only estimates. Council needed to collect Sewerage Discharge Factors (SDFs) before more accurate modeling could be completed. This has now been completed.

Page 14. **Lower bills** for residential and non-residential with low water use

This change in pricing will impact to varying degrees on sewerage customers.

Typically:

- Lower bills will be experienced by residential customers and non-residential customers with a standard 20 mm service connection and low water usage.*
- Non-residential customers with a large service connection(s) (25 mm or larger) are likely to receive higher bills*
- Customers with high water usage are also likely to receive an increase".*



DEPARTMENT OF ENERGY,
UTILITIES AND SUSTAINABILITY
NEW SOUTH WALES GOVERNMENT

Leadership in energy and water sustainability
for New South Wales

DEUS Ref: 04/1380

Ms Kath Knowles
Administrator
Bathurst Regional Council
PMB 17
Bathurst NSW 2795

Dear Ms Knowles

I am writing to you regarding the implementation of the proposed sewerage tariff for Bathurst in 2004/05. Whilst I welcome Council's initiative in moving to introduce best-practice sewerage pricing, I am very concerned at the structure of proposed access charges and the impacts these may have on non-residential customers with large water supply connections for fire flow purposes.

The proposed tariff structure includes among other factors, an access charge based on the size of the water supply connection; as such, customers with large water supply connections will pay relatively more for their services. However, I understand that no allowance has been made for customers who have a large water supply connection for fire flow purposes only. Under such a tariff, customers who may have very low water usage (and hence sewer discharge) may face unwarranted large increases in their bills.

As outlined in *Circular – LWU 3* which was issued to all LWUs in February 2004 (Section 8.3):

The pricing guidelines...are not prescriptive regarding the access charge to be applied where a larger connection size is required for fire fighting purposes. For such a connection, a reasonable approach would be to apply a charge based on the connection size required for water supply and to allow nil or a moderate increase over this charge for provision of the fire fighting capacity.

I strongly recommend that Council amend its proposed sewerage tariff on this basis.

I recognise that that Bathurst Council has been proactive in implementing both water supply and sewerage pricing reform and I commend Council for its commitment to best-practice pricing. Thank you for your commitment to those principles. If you have any queries regarding this issue, please contact Sam Samra on 8281-7435.

Yours sincerely

David Nemtsov
Director General

Page 23. Fair pricing **appropriate pricing signals** – i.e. stop flushing ?

- “Best practice pricing is fundamental to sound management of a sewerage business as it provides:*
- fair pricing to equitably share the cost of service provision and remove significant cross subsidies.*
 - appropriate pricing signals which enable customers to balance the benefits and costs of using the service, thereby promoting efficient use and reduced wastage.*
 - appropriate cost recovery.”*


Page 26. Customers with high water use likely to receive increase. Assumption, low water use - no increase

- This change in pricing will impact to varying degrees on sewerage customers. Typically:*
- Lower bills will be experienced by residential customers and non-residential customers with a standard 20 mm service connection and low water usage.*
 - Non-residential customers with a large service connection(s) (25 mm or larger) are likely to receive higher bills*
 - Customers with high water usage are also likely to receive an increase”.*

Page 28. Common use of using hose reels furry introduced

- (e) That nominal sizing of meters is not used for calculating access charges due to the common practice of using fire hose reels;

Page 29. The Administrator has concerns over "political implications". Administrators ambitions are well known in the community.

 David Sherley
13/05/2004 08:00 AM

To: Bob Roach/BathurstCC@BathurstCC
cc: /BathurstCC@BathurstCC


Subject: Re: user-pays sewer

Thanks.

Have we gone & visited businesses yet or sent letters advising of possible ramifications?

David Sherley
Acting General Manager
Bathurst City Council
158 Russell Street Bathurst NSW 2795
Phone: 02 6333 6206
Fax: 02 6331 7211
Web: www.bathurst.nsw.gov.au

Forwarded by David Sherley/BathurstCC on 13/05/2004 08:00 AM

 12/05/2004 04:00 PM


To: David Sherley/BathurstCC@BathurstCC
cc:

Subject: Re: user-pays sewer

response from Bob (I have printed out copy for you)

GM's Assistant/Public Officer
Bathurst City Council
158 Russell Street Bathurst NSW 2795
Phone: 02 6333 6201
Fax: 02 6331 7211
Web: www.bathurst.nsw.gov.au

Forwarded by Wendy MacDougall/BathurstCC on 12/05/2004 04:01 PM

 Bob Roach
12/05/2004 03:59 PM

To: /BathurstCC@BathurstCC
cc:

Subject: Re: user-pays sewer

for David

The feedback is as follows:

Bob
David wanted to know this info.

No a time management has meant plan place
IND - real job is sewer
Use Pipes
Bob

To DCS

Bob can you do brief timetable & list of actions so we can let Mayor know.

Kath has asked about process to be followed due to political implications

Page 38. 78c/Kilolitre (very low) Note BRC still working on SC in July i.e. after it was supposed to have been introduced. This no doubt was a deliberate strategy in order that BRC Staff had greater influence during the Administration period.

Sewer Usage Charge
That the charge for non-residential and multiple residential properties be 78 cents per kilolitre of filtered water supplied multiplied by a sewerage discharge factor.

Page 39. 16 written submissions

A summary of the 16 written submissions are:

	Objections	Possible Solution under proposed policy
1	Review of SDF requested and category	Confirm residential status - uniform annual charge would then apply
2	Access charges based on meter sizes where there is a requirement for hose reels - small/medium sized industrial penalized. A review of SDF requested.	Review SDF. No proposed policy on nominal meter sizes. Option to provide expert report on ET equivalent.
3	Access charge based on meter sizes where there is nominal water use (range 0-92 kl/quarter), only reason for large meter is	No proposed policy on nominal meter sizes or nominal SDF. Option to provide expert report

	fire hose reel. Claims that if fire hose reel used it would not be discharged into the sewer. Customer feels nominal size meter or nominal SDF is the solution	on ET equivalent.
4	Review of SDF and downsize request - customer points out that meter is larger than similar development recently approved	Review SDF. Hydraulic Engineers Report to confirm downsize request. Cost of downsize worn by customer and fees adjusted accordingly. Option to provide expert report on ET equivalent.
5	Substantial impact on pre-set budget - large increase. SDF review. Council needs to reconsider to better reflect a 'user pay' system	Review SDF. 3 year agreement to phase in charges is assessed as significant and causing hardship. No proposed community service obligation reduction

6	Will place extreme pressure on management which is principally for the benefit of the wider community. Review of SDF requested.	Review SDF. No proposed community service obligation reduction.
7	Unfair to charge by meter size. Almost all of the charge is access. (Property 1 -Charges \$1875.87 , only \$51.87 usage) (Property 2 - Charges \$747.65 , no usage)	Hydraulic Engineer to analyse if meter size is appropriate. Cost of downsize worn by customer and fees adjusted accordingly. Option to provide expert report on ET equivalent.
8	Review of SDF requested. Request to be implement over two years	Review SDF. 3 year agreement to phase in charges is assessed as significant and causing hardship.
9	Downsize request or use of nominal meter	Hydraulic Engineers Report to confirm downsize request. Cost of downsize worn by customer and fees adjusted accordingly
10	Explanation sought on SDF calculation	Site visit by Engineer to explain and review SDF. Option to provide expert report on ET equivalent.
11	Large meter for fire-fighting maybe. Non-profit and large increase	Hydraulic Engineers Report determines if meter can be downsized. Cost of downsize worn by customer and fees adjusted accordingly. 3 year agreement to phase in charges

		is assessed as significant and causing hardship. No proposed community service obligation reduction
12	Substantial impact on pre-set budget large increase. SDF review.	Review SDF. 3 year agreement to phase in charges is assessed as significant and causing hardship. No proposed community service obligation reduction
13	Already paying a volumetric charge in trade waste fees. Review of SDF. Request to remove redundant meter	Review SDF. Hydraulic Engineers Report determines if meter can be removed. Provide a full report for review of current Policy for discharge of Liquid Trade Waste to the Wastewater system.
14	40 mm meter only required for fire fighting	Review SDF. No proposed community service obligation reduction

		Liquid Trade waste to the Wastewater system.
14	40 mm meter only required for fire fighting and feels charge unfair based on this. Request for a SDF review.	Review SDF. No proposed policy on nominal meter sizes. Option to provide expert report on ET equivalent.
15	Request to remove water hydrant at property.	Hydraulic Engineers Report determines if meter can be removed.
16	Feels no relationship between the diameter of the meter and the amount of water used or discharged into sewer. Objects to the term "user-pay" when there is an access charge. Feels system as unfair as charges based on land value. Mentions nominal sizing of meters.	Explain that the new system is termed "Best-Practice" by the state government. Policy direction determined for implementation of sewer charges. Each property may require individual assessment (SDF review, option to provide expert report on ET equivalent and hydraulic engineers assessment for downsizing and rationalisation of meters.

Page 39-41. Option to use ET stated 7 times

Possible Solution under proposed policy
Confirm residential status – uniform annual charge would then apply
Review SDF. No proposed policy on nominal meter sizes. Option to provide expert report on ET equivalent.
No proposed policy on nominal meter sizes.

Page 47. ET's available before meter size method can be used, Reasonable approach and where meter sized for fire nil or moderate increase. All ignored.

- Base sewerage access charges on the peak load the discharger places on the sewerage system. Such dischargers should therefore have the option of providing for Council's consideration, an expert report to establish the peak load (in equivalent tenements (ETs)) their operations place on the sewerage system. In the absence of such a report, the Council can determine the access charge on the basis of the square of the service connection size times the discharge factor. This is the method adopted by Council.
- Assist large water users to use water and sewerage services more efficiently and reduce their demands
 - Adopt appropriate measures to deal with any hardship cases
 - Where a large connection size is required for fire fighting purposes a reasonable approach would be to apply a charge based on the connection size required for water supply and to allow nil or a moderate increase over this charge for provision of the fire fighting capacity.

Page 53. BRC hand out given to media, 8.3 fire fighting connections "planning to charge based on estimated nominal connection size. Ignored.

- 8.3 Fire Fighting Connections**
- The pricing guidelines are not prescriptive regarding the access charge to be applied where a larger connection size is required for fire fighting purposes. For such a connection, a reasonable approach would be to apply a charge based on the connection size required for water supply and to allow nil or a moderate increase over this charge for provision of the fire fighting capacity.
- The Department of Energy Utilities and Sustainability has contacted the Bathurst Council. The Council has explained that it doesn't intend to charge customers for fire flows and will deal with this issue on a case by case basis. Council also plans to phase-in the charges for customers facing a large increase in their sewerage bill over a period of 3 years.
 - Bathurst Council is planning to charge on a similar basis to other Local Water Utilities such as Shoalhaven and Eurobodalla which charge a sewer access charge based on the estimated nominal connection size

Page 65. This change in pricing, deviously worded.

MEMORANDUM

TO: MAYOR
CC: ACTING GENERAL MANAGER
FROM: DIRECTOR OF CORPORATE SERVICES
DATE: 25 MAY 2004
SUBJECT: USER PAYS SEWER
FILE: RR:AA:26.00010 ✓

A report of User Pays Sewer will be contained in the Management Plan process which will be presented to Council on 16 June for their determination. It is my intention to notify each of the commercial users (approximately 1,200) of the proposed change in the way sewer rates are levied.

Contained within the letter will be the cost of the sewer charges for 2003/2004 as compared to the amount of charges for 2004/2005.

As explained in the modelling there will be several businesses which will have fairly substantial increases and these will be implemented over a period of 3-5 years depending upon the amount of increase envisaged.

It will be my intention to make contact with these businesses and have individual discussions with them, the same as we had with the water increases. In respect to residential properties all of the residential properties will receive a fixed charge. Somewhere in the vicinity of about 90% will receive an actual reduction in the sewer charges for 2004/2005.

Notification of the new charges will be undertaken by the use of the media.

I will be liaising directly with Council's Public Relations/Communications Manager, Victoria Jackson, to ensure that ratepayers are kept informed.

Should you have any further enquiries please do not hesitate in contacting me.



R Roach
DIRECTOR OF CORPORATE SERVICES

July 3-04

Minister queries sewerage fee

By Lisa Gervais

FRANK Sartor has waded into council's fight with Bathurst Chamber of Commerce Inc. over its new user-pays sewerage scheme. Late yesterday, Mr Sartor's Department of Energy, Utilities and Sustainability indicated it had queried council about its new charges and is happy with the answer that it has received. The chamber complained to the State Chamber of Commerce, which in turn complained to Mr Sartor's office about the new charge that came into effect on July 1.

Chamber president Lachlan Sullivan has said the sticking point is council charging an access fee based on the size of a business's water meter - in calculating a charge.

He argued that a business may have a large water meter, for fire-fighting purposes, but may use very little water and therefore discharge very little water into the sewerage system.

Mr Sullivan believed non-residential customers were being disadvantaged by this method of collecting money. However, a spokeswoman for Mr

Sartor said while charging for large connections for firefighting is discouraged by the department, "the council has explained that it doesn't intend to charge customers for fire flows and will deal with this issue on a case-by-case basis".

"Council also plans to phase-in the charges for customers facing a large increase in their sewerage bill over a period of three years," the spokeswoman said.

"Bathurst Council is planning to charge on a similar basis to other Local Water Utilities, such as Shoalhaven and Eurobodalla, which charge a sewerage access

charge based on the estimated nominal connection size required for 'normal usage' - not the size that has been installed for fire-fighting purposes." Bathurst Regional Council is changing its sewerage charges so that they are no longer based on land values and it recently sent out letters to customers explaining the new tariff.

Council has written to each of the 300 non-residential customers facing a large increase in sewerage charges, showing the estimated new sewerage costs under the new tariff.

Cattle theft



Council to qualify for certain Government grants. However we do not allow that there is any relationship between the diameter of a water meter, sized to accommodate mandatory fire hose reel systems and the amount of water used on a property or indeed discharged into the sewer system.

Page 93. BRC reference to Carters letter, Page 51

(11) **Ray Carter - Access Charge Sewer (CFO #10)** - advised that the Access fee is a major impact on business. The report includes comments from Department of Energy and people effected and asked the following:

1. Will Council sideline proposals. Refer department concerning a reasonable strategy.
2. Will Council sideline use of nominal meter size as recommended by the Department.
3. What does Council mean by recommendation (e) concerning nominal sizing.
4. What is the access charge proposed by Council, is it water or sewer access charge. Needs to be explained.
5. Will Council by choosing to sideline the guidelines, maintain its eligibility under the country towns water-assist scheme.
6. Council considered this matter in November last year on user pays. the Access charge is not user pays and is not in accordance with Government Guidelines. A meeting was held then in February which Mr Carter was unable to attend. However, no further

Page 127. The access charge is a defacto charge on fire fighting capacity, nothing less

In our meeting I brought up the fact that on all of our properties subject to Council's notice on this matter, the water meters are merely over 20mm in size for domestic purposes because it has been a Council requirement to connect Hose Reels specific for the purpose of fighting fire, through a water meter. On the subject of possible water theft it seemed to me that Mr Roach and yourself consider that water theft is a much larger issue than I would have thought it to be. I take issue with this for two reasons, (the obvious one of course) but especially as it seems part of the case upon which Council is proposing the "Access Charge". I hope that you may be able to elaborate upon this.

In reality the "Access Charge" as proposed by BRC, is de facto charge on fire fighting and it is indeed very difficult not to take offence at the implementation of such a charge.

Page 133. Council considers it has followed the guidelines, then says the guidelines are guidelines only, Council "determines each enquiry on its merits"

1. Council has followed the guidelines for the introduction of a user pays sewerage system as issued by the Department of Energy, Utilities and Sustainability. A copy of the guidelines is **attached** for your perusal. As explained to you at our recent meeting, Council will investigate any matter raised in relation to the meter size required as compared to meter size required for fire fighting purposes. Council will shortly appoint a water hydraulics engineer to investigate cases such as yours.
2. Council will investigate your enquiry regarding meter size. The guidelines as distributed by the State Government are guidelines only. Council is permitted to decide on a system for sewerage charges.
3. Part (e) of the recommendation from the Chief Financial Officer's report to Council on 21 July 2004 is clear. Council is aware of the practice of using water from the fire hose reels in some cases. Council has developed its sewerage system based on the size of meters being used to calculate the access charge.
4. The report made to Council on 21 July 2004 states it is an "annual sewer access charge" the size of the water connection determines the amount of the charge. It is correct to assume that the size of the water meter determines the amount of the Annual Sewer Access Charge.
5. Council has not sidelined the State Government Guidelines. It has chosen to investigate and determine each enquiry on its merits and advise the customer/ratepayer of the outcome. By doing this, there are no breaches of the Guidelines.

Page 137. If the guidelines were followed the non-residential would reflect the load put on the sewer and **be comparable to residential and be fair**

In relation to Council's interpretation, you will see that upon reading the Guidelines attached, Council has met the State Government requirements in respect of implementing this new system.

Page 139. Size of water mains – possible maximum demand, i.e. All water , simultaneously, considered to be capable of going down the sewer. Not agreed to by Council engineering staff . See p 59 / 2007

9. USER PAYS SEWER (26.00010) - Mrs Janice McGilchrist raised issues such as access charges, capability and usage level guidelines.

The Chief Financial Officer advised the following:

- * Access charge in State Government Guidelines.
- * Size of supply has been raised as an issue. Council have and are contacting users and will appoint a hydraulic engineer to review the size of water mains as required.
- * Size of water mains is important as need to have capacity at sewerage works to meet possible maximum demand.
- * Council has received approximately 20 letters back from users.
- * Council is reviewing the trade waste issue and will report to the July meeting of Council on this.

Page 143. Minister Sartor assured that Guidelines have been met. **THEY HAVE NOT.** Define fairness !

The Hon. Frank Sartor
Minister for Energy & Utilities
Level 31
Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Dear Minister

User Pays Sewerage System

Thank you for taking time to see Council to discuss the implementation of Best Practice Sewer Pricing. As you are aware, Bathurst Regional Council has been very pro-active in the introduction of this State Government initiative.

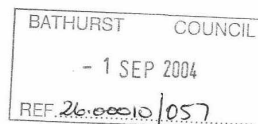
Council has taken considerable care to ensure the Guidelines as detailed in your document titled "Best-Practice Management of Water Supply and Sewerage Guidelines" have been met. Council has also been in close liaison with its customers and is currently addressing problems raised by them to ensure a very smooth introduction of this new system.

Council has recently appointed a Hydraulic Engineer to assist with the assessment of water meter sizing and the correct analyzing of Sewerage Discharge Factors to ensure that each customer is treated correctly.

Council was surprised to receive a letter from your Director General dated 20 July 2004 in relation to the introduction of the new Best Practice sewer pricing.

Page 153. What matters were "raised". Was it the surprise Council mentioned in getting a strong letter from the Director General. Where is the reply? A subtle reference to Director General Nemztow ??

Kath Knowles
Administrator
Bathurst Regional Council
Civic Centre
Cnr Russell and William Streets
BATHURST NSW 2795



26 August 2004

Dear Ms Knowles

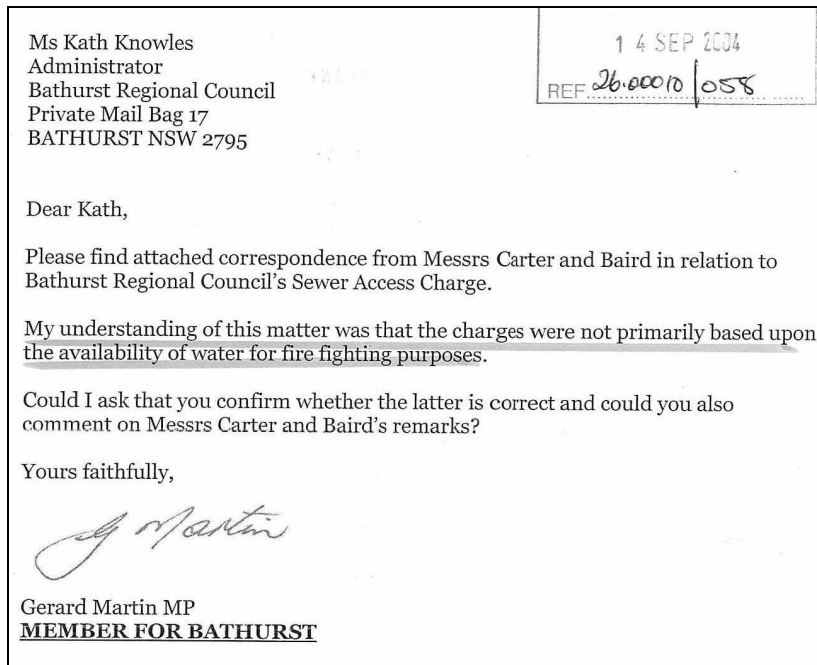
I refer to your letter of 11 August 2004 regarding "User Pays Sewerage System".

The Minister has requested that I inform you the matters raised are under consideration, and a reply will be provided as soon as possible.

Yours sincerely


Aldo Pennini
Chief of Staff

Page 159. Gerard Martins understanding. He always agreed the matter was wrong but did not have the guts to put it right.



Page 161. To suit each situation – i.e. placate no doubt !

Surely it is not right that Council varies their argument to suit each situation while the glaring anomaly remains that they have introduced a so called “User Pays” sewer charge, the dollar value of which for us is based primarily on the availability of water for fire fighting purposes.

Dear Mr Carter

Implementation of Best Practice Sewer Charges

I refer to your letter received by Council on 24 August 2004. In reply to your queries I supply the following information.

1. The purpose of a Hydraulic Engineer investigating a property is to establish if a smaller size meter and/or a rationalization of meters is appropriate for the property. The hydraulic engineer is the independent expert in determining the criteria for this.
2. It is not illegal to use fire hose reels for purposes other than fire fighting. For this reason Council ensures that all fire hose reels are supplied from a metered water supply. All fire hose reels should be inspected annually (as with all fire extinguishers) to check that they are suitably maintained. Council cannot legally stop the practise of using fire hose reels for purposes other than fire fighting.
3. The access charge system has no impact on trade waste practices. That is, Trade Waste Agreements are still entered into, maintained, and breaches of Trade Waste Agreements are followed up for appropriate action.
4. A summary of the process for the introduction sewer charges was supplied to you in Council's letter dated 5 August, 2004. Copies of specific minutes of meetings can be supplied if required. The summary provided to you would also be supplied to the State Government
5. The nineteen responses provided valuable feedback to Council. It enabled Council to address the major concerns raised and assess the general view of ratepayers to this change. These responses came about after letters were sent to properties where Council had estimated they would be adversely affected by the changes – a rate increase in excess of \$100.

Since the issue of the letters and the annual rate levy, a total of 31 responses/requests have been received regarding the introduction of best-practice sewer charges. In summary most have requested that their meters be investigated to see if they can be reduced in size and to have their sewerage discharge factors investigated.

6. Council will reconsider the implementation of nominal sizing of water meters if it is given enough supporting evidence to establish that there is a more equitable manner of applying charges. At the present time the common belief is still that fire hose reels are used for purposes other than fire fighting and impact on the sewer system.

As previously advised Council has adopted various options to assist in the implementation of Best Practice Sewer Pricing. These options were outlined in Council's letter to you dated 5 August 2004. Should you wish to avail yourself of any of these options please specify the particular properties that you own that you wish to have reviewed.

Yours faithfully

Kath Knowles
ADMINISTRATOR

Page 167. The guideline here are guidelines only!! Council to ensure all ratepayers are treated fairly and equitably. Is this what happened to us? We do not think so !

In respect to the statement made to Mr Carter, Mr Carter was advised that the State Government Circular contained Guidelines only and it was Council who decided on the type of user pays system that Council introduced. Council took into account the advice of the State Government Guidelines and made the determination that access charges would be based on water meter size. Mr Carter has received three letters to-date advising him of the procedure and methods used in calculating his user pays sewer charges. Mr Carter has also been advised that Council has appointed a hydraulic engineer to investigate the meter size of each of his properties that he has raised as a concern to him and Council will make a determination based on pressure results as to the correct size for water meters on his properties. He has also been advised that in the event of downsizing of the water meter being permitted then the appropriate charges will be made for his property from the time of his enquiries.

In respect to Mr Baird, Council advised Mr Baird of the procedure for implementation of the State Government Guidelines and he too has available Council's commitment to investigate the sizing of his water meter should he so wish.

Council will, upon receipt of all information from the people who have requested it, as a matter of course, review the methods of charging to ensure all ratepayers are treated fairly and equitably.

Page 177. Enabled Council – ET's were the answer but they never used or allowed them, "view of the rate payers

5. The nineteen responses provided valuable feedback to Council. It enabled Council to address the major concerns raised and assess the general view of ratepayers to this change. These responses came about after letters were sent to properties where Council had estimated they would be adversely affected by the changes – a rate increase in excess of \$100.

Page 179. They maintain that the fire hose reel water goes down the sewer. That is a ridiculous assumption but used to cajole and confuse the uninformed.

6. Council will reconsider the implementation of nominal sizing of water meters if it is given enough supporting evidence to establish that there is a more equitable manner of applying charges. At the present time the common belief is still that fire hose reels are used for purposes other than fire fighting and impact on the sewer system.

Page 181-185. Indication of increases on our properties given to BRC

TOTAL INCREASE \$ 21151.54

Page 187. This time BRC claim to have “applied the specific guidelines”. Always leaving out reference to compliance with the fairness and crucial load put on the sewer provisions. BRC are always deceptive.

In respect to your concerns, Council applied the specific guidelines regarding non-residential sewerage charges prepared by the Department of Land and Water Conservation (DLWC). These guidelines were provided to all NSW Local Water Utilities to facilitate the introduction of best-practice pricing. You will note the highlighted section states “The sewerage access charges should be proportional to the square of the size of the water supply service connection to reflect the load that can be place on the sewerage system”.

Page 243. Councils assurance to the Minister. The resulting independent hydraulic report was consequently ignored. In fact R Roach attempted to blackmail against the Engineer who was quite financially dependant on work from the Council.

As you point out, the present charges for some customers such as those with large connections sized for fire flows, may be higher than warranted by their load on the sewerage system. Such customers may wish to submit evidence to Council that supports an alternative approach to determining sewer access charges. This may involve presenting an independent hydraulic report which analyses the customer's historical and likely future water consumption and sewer discharge patterns and the likely peak discharge requirements. Council has assured me that it will assess such evidence provided by its customers on a case by case basis.

Page 246. Minister Sartor's understanding is obviously from what council had been feeding him. The Minister an eye to ensure protégé Knowles popularity in view of her taking the State seat from G Martin.

Accordingly, if you believe that the access charge ascribed to you by Council does not reflect your load on the sewerage system, you may wish to commission an independent hydraulic report and present it to Council. Such a report would analyse the historical and likely future water consumption and sewer discharge patterns of your premises and the likely peak discharge requirements.

Best-practice sewerage pricing is sometimes a difficult adjustment to make for local water utilities and some of their customers. Bathurst Regional Council has taken a responsible approach in moving to such a tariff.

Thank you for bringing this matter to my attention.

Yours sincerely



Frank Sartor