

15 August 2014

Ms Mary Hartley QC
President
Industry Panel
GPO 158
Canberra
ACT 2601

Dear Ms Hartley

Sent electronically to email address: industrypanel@act.gov.au

Re: Submission on the Review of ICRC Price Direction for Regulated Water and Sewerage

Thank you for your letter of invitation to provide a submission on the Review of the ICRC's Price Direction for Water and Sewerage (requested by ACTEW in September 2013).

While the review is into water and sewerage pricing - our submission will highlight issues regarding water pricing only.

We, the Executive Committee, write on behalf of the Owners Corporation, Units Plan 999 that comprises 35 dwellings owned by ACT rate and tax payers. We made submissions to the ICRC reviews of 2007-08 and 2013 and were invited to participate in the Public Hearings each time, and attended the Directions Hearing on 25 July 2014.

Our submissions have been based on our comprehensive records of water pricing and usage. These present a unique perspective on constantly increasing prices and their impacts on the consumers and taxpayers (as required in sections 20(2) (a), (c), (g) and (j) of the Act) and question the justification for increased prices.

Our submission highlights the following:

- ACTEW has not considered the impacts on water consumers and taxpayers in its submissions but bases its case on revenue raising and return on investment.
- ACTEW still has not disclosed the identity of the entities that it used as benchmarks— simply referring to these as 'typical firms' in the energy sector rather than water/sewerage utilities sector.
- ACTEW has cited an entirely inappropriate example to defend and substantiate their claim regarding cost of service – the US energy company Hope Natural Gas. Hope Natural Gas is a gas company owned by Standard Oil with 5 major regional customer companies with millions of consumers – not a water and sewerage provider.
- The two experts engaged by ACTEW work in the energy sector not water/sewerage utilities sector.
- Our research into major water utilities in Australia shows that ACTEW's prices are the highest (see table at Attachment 4 to the Submission).
- ACTEW's case appears to be about the energy sector rather than the fact that it is about a publicly-owned water/sewerage utility operating in a monopoly environment.

ACTEW is making a case to achieve further increased revenues irrespective of the fact that water bills have effectively risen 450% over the last 10 years while consumption was relatively stable and the CPI increase was 28.2%.

We hope that the Industry Panel will consider our enclosed submission and supporting documentation that presents ACT's taxpayers and consumers view about our water/sewerage supplier.

Yours faithfully



Marisa Gerussi
Chair, Executive Committee UP999

Enclosed: UP999 submission to the Industry Panel (see over for attachments)

Attachments to the UP999 Submission:

1. UP999 Case Study showing 450% rise in water bills over last 10 years
2. ACTEW water pricing table from 1981-82 to 2007-08 with added data from ACTEW website to 2013-14
3. Copy from ICRC Final Report June 2013 - Appendix 2 Submissions, A2.7 Submissions on the draft report, and A2.8 Issues raised at the public hearing 23 April 2013
4. Water Unit prices for residential customers in major Australian cities.

Background

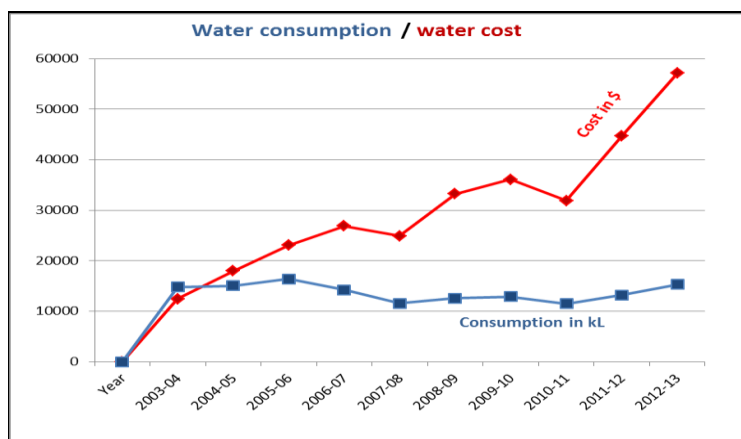
This submission presents “the issues that should be considered as part of the review”. It will address water unit price and supply charges only, not those associated with sewerage.

We write on behalf of the Owners Corporation UP999 that comprises 35 stand-alone dwellings owned by ACT consumers and taxpayers. Each dwelling has a private garden and access to common gardens resulting in having similar water needs to sole occupancy households.

We made submissions to the ICRC reviews of 2007-08 and 2013 and were invited to participate in the Public Hearings each time. Our submissions have been based on our comprehensive records of water pricing and usage over many years and additional research.

On invitation, we submitted our feedback on the Industry Panel’s Approach Paper on issues of concern and attended the Directions Hearing on 25 July 2014.

Our submissions and presentations represent a unique perspective of how ordinary residential ACT tax and rate payers have been adversely affected by water increasing prices and tier allowance changes. These have resulted in a 450% rise in water bills over the last 10 years while consumption was relatively stable (see our table below and data at Attachments 1 & 2). CPI increase over the same period was only 28.2% (source: ABS CPI Calculator).



Matters of Concern to Consumers and taxpayers

- The Industry Panel must pay attention to all the matters listed in Section 20(2) of the Act; particularly Sections 20 (2)(a),(c), (g) and (j) that require impacts on consumers and taxpayers be considered.
- ACTEW’s application only responds and refers to (d), (e), and (i) of Section 20(2) of the Act and ignores its position as a publicly funded utility operating in a monopoly environment, and ignores its responsibilities to and impact on consumers and taxpayers (i.e., Sections 20(2) (a), (c) (g) and (j)).
- The Panel needs to build into its review process a way that will encourage ordinary consumers, taxpayers and other stakeholders to participate – relying on web postings is not an effective way to reach consumers and encourage participation.
- The Panel should note that ACTEW in its Facts and Contentions still has not disclosed the identity of the entities that it used as benchmarks. ACTEW uses data from energy based entities, not those concerned with water and sewerage. Further the Panel should request ACTEW to use comparable Australian water and sewerage utilities as their benchmark.
- The two experts (from National Economic Research Associates) engaged by ACTEW, and quoted extensively in their Facts and Contentions submission, appear to be more

familiar with the energy/resource sector not the water/sewerage utilities sector. The Panel also needs to note that there was reported severe criticism by ASIC¹ of one of these experts.

- The Panel must conduct this Review with regard to ACTEW's role as a publicly owned utility and not that of a private sector corporation and take this into account.

The Panel needs to reassure consumers that the review will address the following:

- Water pricing that is fair and reasonable for the consumer and taxpayer.
- ACTEW's responsibilities to ACT taxpayers and other consumers.
- A publicly owned utility that operates an asset established by taxpayers in a monopoly environment must not be treated as a private sector company.
- Use of appropriate benchmarks for an Australian publicly owned utility providing water (and sewerage) services that operate in a monopoly environment².
- Section 20 (2) (c) of the Act that requires attention be given to reducing costs to ACT taxpayers and other consumers.
- Access by ordinary ratepayers to detailed information promised by ACTEW in 2013.
- Encourage ordinary ratepayers and consumers to engage in the review.
- ACT infrastructure is comparatively new compared to other major Australian utilities (Eg. Tasmania is struggling to fix its 100 year old infrastructure).

Constantly rising prices

As shown in our Attachments 1 and 2 to this document, ACT taxpayers and other consumers have experienced higher and higher water bills amounting to a 450% increase in 10 years - while consumption has been stable. Over the period CPI has been 28.2% (see also table below showing price and tier allowance changes).

Year	Water supply charge	Tier /block allowance	Tier amount in kL	Charge rate in \$
2003-04	\$125.00	Tier 1	< 175kL	\$0.43
		Tier 2	> 175kL	\$1.05
2013-14	\$102.56	Tier 1	< 0.548kL	\$2.55
		Tier 2	> 0.548kL	\$5.10

In considering ACTEW Corporation's application, the Panel needs to recognise the unusual circumstances that apply. There is no other example that we found where a service provider has increased its product prices by effectively 450% over 10 years. The ACTEW case for higher prices is indefensible.

During the last 10 years, various arguments have been put by ACTEW as to why the price of water should rise:

- in 2003 during the drought an increase was justified on the basis that it would encourage householders to use less water (ACTEW said "*if you make it expensive enough they will stop using it.*"), then;
- in 2008 an increase was demanded because householders used less water so ACTEW argued that they needed more revenue, and

¹ Watoday April 30 2009 reported the following ASIC view "*The qualifications of Gregory Houston,the head of Nera Economic Consulting were called into question and he was also accused of drawing conclusions to suit the company which paid him rather than a detached expert opinion on whether statements made by Fortescue misled the market and let to spikes in its share price*".... " Neil Young QC for ASIC, told Justice John Gilmour that Mr Houston's report was a combination of economics, 'partial economics' and 'pseudo-economics'". (www.watoday.com.au/printArticle?id=496760)

² ACTEW documents cite as a 'typical firm' companies like Hope Natural Gas that are not true 'comparator firms'. Hope Natural Gas is a US gas company owned by Standard Oil with 5 major regional customer companies with millions of consumers and is clearly not a water and sewerage provider.

- in 2013 the rationale for a further increase was put for commercial reasons and the return to government.

ACTEW Water should not operate as a revenue collector for the ACT Government. [*We note that in the ACT Government's April 2013 Press Release it supported ICRC's determination for a reduction, only to declare 2 months later that there would be an increase.*]

We support commonly expressed concerns

The Panel needs to pay attention to the key issues and commonly expressed concerns raised in the submissions to the ICRC in 2013 (See Attachment 3). There is a pattern to these issues of concern regarding ACTEW's approach to water pricing.

The respondents and participants in ICRC's deliberations were consistent in their view that:

- The procedure for determining water pricing should be fair and reasonable for the ACT taxpayer and other consumers.
- The demand of the ACT Government for a dividend should not be the driver for water prices or water pricing structures.
- We also support the constantly repeated view that ACTEW Water should be a separate agency that stands alone from ACTEW Corporation. [*This was recommended by the ICRC, the ACT Civil and Administrative Tribunal, the Ratepayers Association of the ACT, and the majority of people who made submissions to the ICRC over the course of the last 2 years*].

(See highlights in **Attachment 3**)

Need for greater operating transparency and accountability

It is difficult for the consumer and taxpayer to extrapolate from ACTEW's financial reports just how much it costs to run ACTEW's water and sewerage operations – particularly the real income and expenditures relating to the provision of water and sewerage services to consumers and taxpayers in this region. The ACTEW Corporation's Annual Reports do not provide details of these operations in the published financial reports (including cost of human services, and other direct costs etc).

In the draft ICRC report, ACTEW claimed that 9 out of 19 attachments be kept confidential and in the final ICRC report 6 out of 20 attachments were kept confidential.

In reviewing ACTEW's contentions and proposed alternatives presented recently, the Panel needs to bear in mind the real cost of running the water and sewerage service remains undisclosed and so is difficult to evaluate. This includes the arguments put regarding cost of capital, 'appropriate' rate of return as well as the re-sets and depreciation.

The need for pass-through recovery continues to be presented by ACTEW even though the ICRC discounted it and ACTEW agreed. ACTEW also talks about 'competitive neutrality' but does not explain how this applies to a monopoly.

ACTEW's 'typical firm' approach and the 'Houston approach' to investments and incentives relate more to ACTEW Corporation, ActewAGL and its joint venture energy businesses (including the discussion of bonds and alternative hedging arrangements). These should not be part of the analysis of the functioning of ACTEW Water, the ACT's water and sewerage provider³.

The ACTEW case for 'risk' is not credible when compared to the greater challenges and risks faced by other major Australian water and sewerage providers.

Therefore the Panel should deal with ACTEW Water separately from ACTEW Corporation Ltd and its joint venture partnerships (particularly foreign power utilities).

³ The ACTEW Corporation's organisational chart shows ACTEW Water as a separate function. See also chart in Attachment 3 (page 15 of this document)
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As ACTEW has a monopoly on the supply of water and associated services, it must honour its social contract with the people of the ACT and be fair and transparent in the setting of prices and delivery of services.

CASE STUDY

ACTEW ACHIEVES 450% INCREASE IN WATER REVENUE FROM HOUSEHOLDS IN JUST TEN YEARS

Our usage and cost data collected over many years shows that water consumption in 35 households has varied little since the beginning of restrictions. However, over the last 10 years the cost of water has increased **450%**. CPI increase over the same period was only 28.2% (source: ABS CPI Calculator).

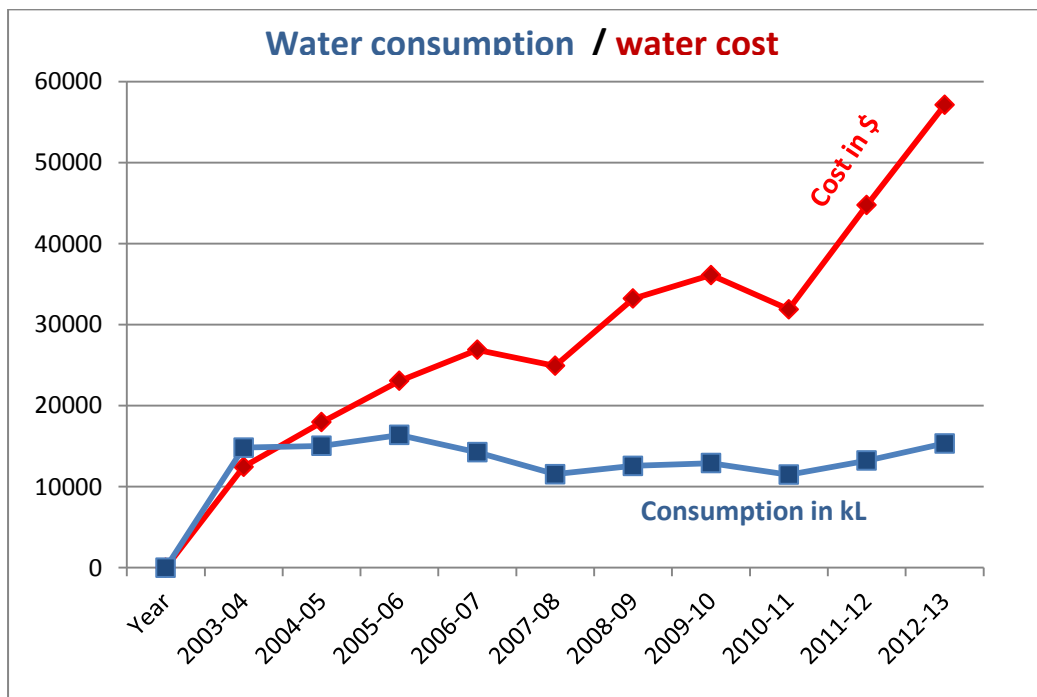
Because of the many changes to the number of tiers, the water allowance within each tier, cost of water in each tier and water abstraction charges and utilities network facilities taxes, all ACT households have had to wear a 450% increase in their water bills. (This is further illustrated in the tables in **Attachment 2**). Our data is reflective of the circumstances faced by most ACT residential consumers.

In the last 10 years various arguments have been put by ACTEW as to why the price of water should rise:

- in 2003 during the drought it was to encourage householders to use less, then
- in 2008 it was because householders used less and more revenue was sought,
- lastly the rationale was for commercial reasons and the return to government.

It is difficult to understand how ACTEW could possibly have other than a surplus of funds given these real-term increases in water revenue.

The chart below clearly shows the cost increases that 35 households paid despite stable consumption since 2003-04. In 2003-04 we paid about \$12,457 for consuming around 14,815kL, whereas in 2012-13 we paid \$57,127 for consuming about 15,339kL (about 500kL more).



Actew water pricing table from 1981-82 to 2007-08 with added data from Actew website to 2013-14

2008-09 to 2013-14 water charges update

Year	Water supply charge	Allowance Amount/kL	Amount in kL	Rate
2008-09		Tier 1	0.548kL	\$1.85
(on average per day of the billing period)		Tier 2	>0.548kL	\$3.70
2009-10	\$89.55	Tier 1	>0.548kL	\$1.95
		Tier 2	<0.548kL	\$3.90
2010-11	\$92.08	Tier 1	>0.548kL	\$2.00
		Tier 2	<0.548kL	\$4.01
2011-12	\$95.36	Tier 1	>0.548kL	\$2.43
		Tier 2	<0.548kL	\$4.86
2012-13	\$99.83	Tier 1	>0.548kL	\$2.43
		Tier 2	<0.548kL	\$4.86
2013-14	\$102.56	Tier 1	>0.548kL	\$2.55
			<0.548kL	\$5.10

A2.7 Submissions on the draft report

	Date received	Submitter	Key issues raised/information provided
8	28 February 2013	Mr Chris Ansted	Supported the proposed FCR scheme and the proposed economic life of the water security assets.
9	1 April 2013	Mr Stephen Thomas	<p>Endorsed the recommendation to separate ACTEW's water and sewerage business.</p> <p>Submitted that the proposed new water and sewerage entity should not be used by government to support community organisations.</p> <p>Requested consideration of a 'Reserve Bank of Australia' model of governance for ACTEW.</p>
10	28 March 2013	Horticultural Society of Canberra Incorporated	<p>Submitted that the Commission should start considering drought-pricing approaches now rather than when drought is imminent.</p> <p>Requested that detail be provided on process and timing of the drought-pricing investigation mentioned at the public forum on 26 March 2013.</p>
11	3 April 2013	Mr Kevin Cox	<p>Submitted that the price of water be set at a level to control demand – with a fixed charge, single-tier volumetric price and the introduction of Water Rewards.</p> <p>Supported the Commission's recommendations to review ACTEW's governance arrangements and proposed that governance arrangements should reflect ACTEW's role as a provider of water and sewerage services to the ACT community.</p>
12	8 April 2013	Mr Barry Sumner	<p>Submitted that the Tier 2 volumetric price should apply to usage above 300 kL/a (75 kL/quarter) rather than the current 200 kL/a.</p> <p>Suggested that sewerage services should attract a volumetric as well as a fixed charge and proposed using winter water usage as a proxy for measuring sewage volumes.</p>
13	8 April 2013	Mr David Denham	<p>Contended that ACTEW's prime role and responsibility is to provide water and sewerage services and does not include providing government revenue.</p> <p>Submitted that dividends to government should be based on the official interest rate, the CPI or some other independent parameter.</p>
14	10 April 2013	Dr Brendan Godfrey	<p>Endorsed the Commission's recommendation to review ACTEW's governance structure and separate ACTEW's water and sewerage business.</p> <p>Proposed a 'Reserve Bank of Australia' model of governance for ACTEW.</p> <p>Supported the proposed FCR scheme.</p> <p>Submitted that ACTEW should not be used to raise revenue for the ACT Government through water prices.</p>
15	11 April 2013	Mr Bob Freiderich	<p>Submitted that the water price should be reduced even further than proposed by the Commission as there is no shortage of water.</p> <p>Submitted that the ACT Government should raise revenue directly and not through water prices.</p> <p>Submitted that ACTEW should not support community organisations with funds raised from water customers.</p> <p>Endorsed recommendation to separate ACTEW's water and sewerage business.</p>

	Date received	Submitter	Key issues raised/information provided
23	12 April 2013	ACT Government	<p>Stated that flexible pricing is a matter included in the terms of reference and that the government is looking forward to seeing it addressed over the course of the next regulatory period.</p> <p>Submitted that it is more appropriate to use a flat cost recovery profile for the FCR scheme for a more equitable distribution of costs and benefits.</p> <p>Stated that if the benefits from the FCR scheme are negated by an impairment of ACTEW's assets, the scheme must be reviewed.</p> <p>Submitted that the Commission should examine whether the FCR scheme causes regulatory uncertainty and raises the probability of future underinvestment in capital.</p> <p>Submitted that the proposed approach to cost of capital is acceptable for the purposes of competitive neutrality.</p> <p>Supported the draft return on equity, but submitted that the appropriate return on equity can only be assessed with full knowledge of the final outcome and consequences for the overall budget.</p> <p>Proposed that the return on equity be reviewed at the biennial assessment.</p> <p>Clarified that the aim of asking for an examination of all regulatory models in the terms of reference was to minimise the effect of significant price fluctuations.</p> <p>Noted that ACTEW's water business has not been a contributor to dividends in recent years.</p> <p>Accepted the Commission's proposal in respect of not allowing the revenue catch-up from the current regulatory period.</p> <p>Submitted that Uriarra Village costs were appropriate and necessary, and that ACTEW undertook the projects to required government standards.</p> <p>Noted that the Commission has not fully adopted the views of Cardno in relation to operating and capital expenditure.</p> <p>Agreed with the Commission's concerns about prudence in relation to the M2C project, but did not agree that costs are inefficient and therefore suggested that full costs be included in the regulatory asset base.</p> <p>Submitted that the Commission needs to ensure a clear understanding of benefits, costs and requirements of a greater regulatory compliance model for all stakeholders in the final determination.</p>
24	21 June 2013	ACT Government	<p>Submitted that the Commission should adopt a return on equity value of 8.5 per cent.</p>

	Date received	Submitter	Key issues raised/information provided
16	11 April 2013	Ratepayers Association of the ACT	<p>Did not support the revenue catch-up but recognised the need for mechanisms to cover significant fluctuations in demand.</p> <p>Supported a zero return on equity.</p> <p>Endorsed the recommendation to separate ACTEW from ActewAGL.</p>
17	11 April 2013	Dr Lintong Feng	<p>Supported drought pricing and promoted additional usage when dams are full.</p> <p>Submitted that the Commission should have responsibility for determining the cost of capital.</p> <p>Proposed reducing the fixed water charge.</p> <p>Submitted that the Commission should determine the efficient cost of debt.</p> <p>Recommended separating bulk and retail water supply.</p> <p>Requested transparency in the Commission's water demand modelling.</p> <p>Proposed a partial adjustment model for dealing with water demand uncertainty.</p>
18	12 April 2013	Mr Scott Crawford	<p>Provided extensive comments and modelling on the structure of water and sewerage services tariffs.</p>
19	12 April 2013	Dr Terry Dwyer	<p>Provided vigorous support for a zero return on equity.</p>
20	12 April 2013	O'Malley Park Executive Committee	<p>Agreed that prices should be lower – significant reduction on those proposed in the draft report.</p> <p>Supported the proposed pricing structure.</p> <p>Supported the form of regulation.</p> <p>Supported the proposal to not recover revenue shortfall.</p> <p>Raised concerns over ACTEW's inability to manage expenditure.</p> <p>Submitted that the return on equity should be zero.</p>
21	12 April 2013	ACAT	<p>Supported making the TOC Act operate as a supplement to the Corporations Act.</p> <p>Supported separating ACTEW from ActewAGL as a stand-alone TOC.</p> <p>Supported the FCR scheme.</p> <p>Supported the Commission's firm-specific approach to cost of capital.</p> <p>Agreed with the proposed six-year regulatory period with two-year intervals.</p> <p>Supported further price reductions.</p> <p>Proposed tariff a structure change with a lower Tier 1 water price.</p> <p>Noted that there is no special pricing for large customers.</p> <p>Submitted that the report ignores concession payments and levels.</p>
22	12 April 2013	Mr John Bromhead	<p>Submitted that there should be a single consumption tariff and the supply charge should be raised.</p> <p>Submitted that the Commission has not made a clear case for its water-pricing approach.</p>

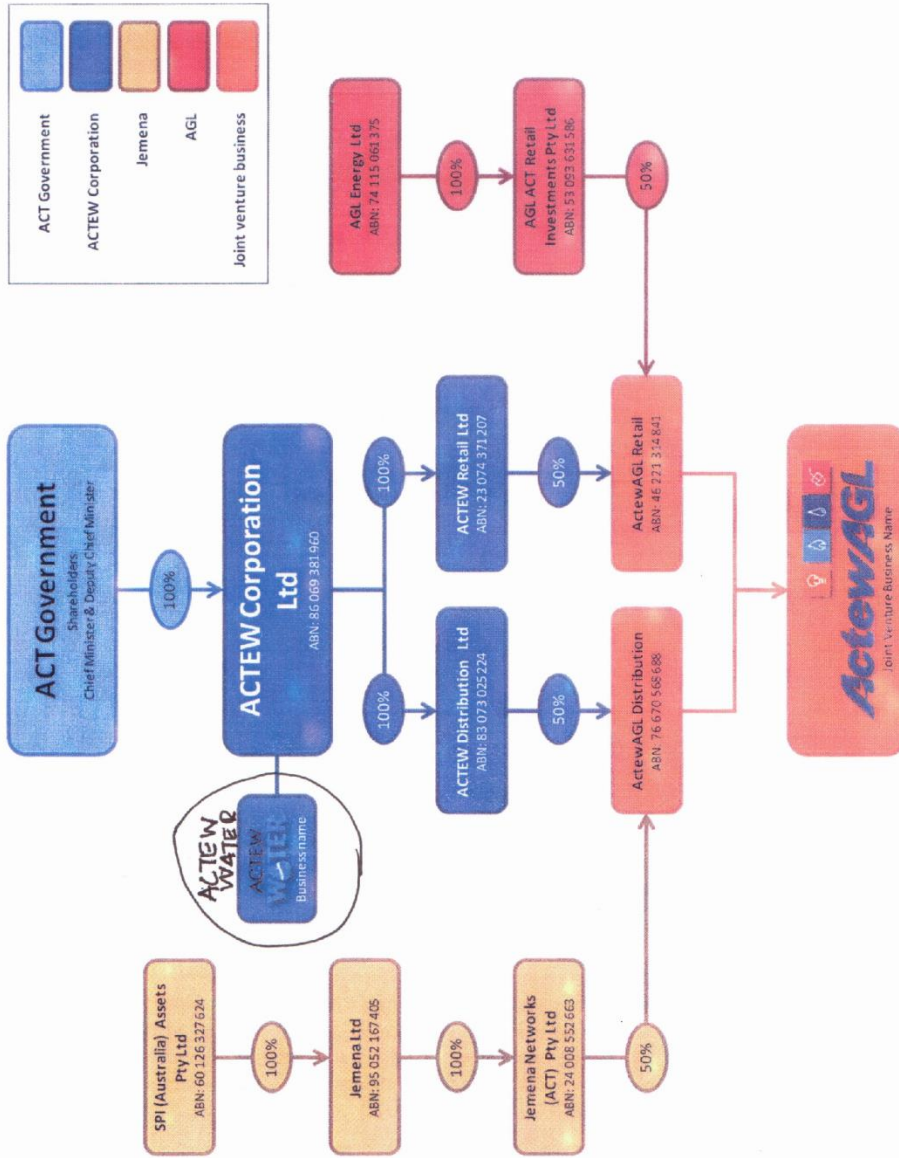
Appendix 2 Submissions

Participant	Key issues raised/information provided
	<p>Raised concerns about the level of the ACT Government tax take.</p> <p>Remarked on how expensive ACTEW water is compared to prices in Sydney.</p> <p>Suggested removing the inclining block tariff structure for more efficient water use, citing the 2011 NWC report into water-pricing reform.</p>

A2.8 Issues raised at the public hearing, 23 April 2013

	Participant	Key issues raised/information provided
1	ACTEW (Mr Mark Sullivan)	<p>Raised concerns that the draft report approach to regulation departed from standard regulatory practices.</p> <p>Stated that ACTEW saw the six-year period as a series of two-year regulatory periods with increased regulatory costs and a disincentive for ACTEW to drive efficiencies.</p> <p>Raised concerns that the Commission rejected the operating and capital expenditure recommendations of its engineering consultants.</p> <p>Strongly disagreed with the Commission's use of 2010–11 expenditure as a basis for forecasting operating expenditure.</p> <p>Did not support the Commission's treatment of tax.</p> <p>Disagreed with the Commission's draft decision to exclude the current period revenue catch-up but stated that ACTEW would agree to forgo the catch-up under certain circumstances.</p> <p>Stated that the draft report, if implemented, would result in an accounting impairment of several hundreds of millions of dollars to ACTEW Corporation, with consequences for dividend payments.</p> <p>Raised concerns about the level of consultation on the draft report.</p>
2	Dr Lintong Feng	Made a presentation on the water-pricing paradox and drought pricing.
3	O'Malley Park Executive Committee (Ms Suzanne Vidler)	<p>Noted the substantial increase in water prices over the last 10 years.</p> <p>Supported the water prices proposed in the draft report but recommended that each tier price should be reduced.</p> <p>Supported not allowing ACTEW to recover the revenue shortfall in the current period.</p> <p>Supported the proposed six-year regulatory period with two-year reviews.</p> <p>Supported the Commission's governance proposals with respect to ACTEW.</p> <p>Supported a zero return on equity.</p>
4	Mr Scott Crawford	<p>Discussed a more flexible water-pricing approach and proposed the introduction of a volumetric sewerage charge.</p> <p>Raised the issue of individual water meters for multi-occupancy dwellings.</p>
5	Ratepayers Association of the ACT (Mr Peter Jansen)	<p>Supported the Commission's draft determination in respect of the revenue catch-up.</p> <p>Supported the Commission's governance proposals with respect to ACTEW.</p> <p>Called for more transparency on what proportion of water bills constitutes ACT Government taxes and charges, including dividends.</p> <p>Accepted the trade-off between lower water prices and reduced government dividends.</p> <p>Supported the principle of intergenerational equity in relation to sharing the cost burden.</p>
6	Mr Stephen Thomas	<p>Supported the Commission's governance proposals with respect to ACTEW.</p> <p>Supported no return on equity to the government.</p>
7	ACAT (Mr Peter Sutherland and Mr William Percy)	<p>Supported the Commission's draft decision on the revenue catch-up from an equity perspective.</p> <p>Recommended that the Commission apply any price reduction entirely to the Tier 1 price to produce a more equitable outcome for all residential households and private tenants in particular.</p> <p>Raised concerns about the Tier 1 and Tier 2 pricing arrangements and quarterly billing.</p> <p>Made the case that broadly low-income people are low water users.</p>
8	Mr Bob Friederich	Proposed that the scarcity pricing factor in water prices should be removed now that water is no longer scarce.

Figure 2.1 ACTEW's current corporate structure including joint venture businesses



Water unit prices for residential customers in major centres

Research shows that most utilities suggest that 200kL is the average annual consumption per household.

200kL is used to illustrate what might be an average annual cost using the highest charge rates in each location still demonstrating that ACT has the highest charges.

Authority	Tiers/blocks	Usage charge	Supply fee/charge	Indicative cost per household per annum
	<i>in kilolitres or litres/day /qtr</i>	\$	\$/per year	<i>Based on 200kL average consumption per year and using the highest water charge where cost per litre or per quarter are quoted</i>
ActewWater				\$1056.70 av cost
	0.548 kL/day	\$2.64	\$102.56 pa	plus supply charge
	Over 0.548 kL/day	\$5.29		\$1159.26 total pa
Sydney Water				\$446.40 av cost
	1.0 kL	\$2.232	\$114.04 pa	plus supply charge
				\$560.44 total cost
TasWater				\$189.48 av cost
	1.0 kL	\$0.9474	\$296.52 pa	plus supply charge
				\$486.00 total cost
City West (Melbourne)				
	< 440 L/day	\$2.306	\$218.60 pa	
	440-880L/day	\$2.7241		
	> 880 L/day	\$4.0749		\$810.00 av cost - based on highest charge
				\$1029.51 total cost pa
Perth				
	< 150 kL	\$1.464 c/kL	\$218.06 pa	\$317.15 av cost
	150 to 500 kL	\$1.951 c/kL		plus supply charge
	> 500 kL	\$2.763 c/kL		\$535.21 total cost
Qld (Brisbane)				
	< 63 kL/qtr	\$0.692909	\$173.61 pa	
	64 kL to 75 kL/qtr	\$0.73555		
	> 76 kL/qtr	\$1.311197		\$262.24av cost - based on highest charge
				plus supply charge
				\$358.35 total cost