



Mr M Geaney
Assistant Director Licensing
Level 6 Governor Stirling Tower
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Perth WA 6000

Dear Mr Geaney

PROPOSED AMENDMENT TO OPERATING LICENCE No. 38 (GASCOYNE WATER Co-OPERATIVE LTD)

The Department of Water (DoW) has reviewed the Gascoyne Water Co-Operative's application outlining an amendment to its operating licence. The DoW notes the Cooperative's proposal to extend its operating area for irrigation and non-potable water supply services provision within the southern and western boundaries of the Carnarvon Controlled Area boundaries.

The DoW has provided (below) some general and specific comments on matters which it considers may be pertinent to adequately understanding and/or assessing the merits of the Cooperative's application. The comments are provided solely on the basis that some of these may also be relevant considerations for the Authority in its deliberations and final decision on the application.

General Comment

Notwithstanding that the Authority's approval of the proposed operating area amendment, if granted, would be on a non-exclusive basis, in making its decision the Authority may wish to consider:

- Whether adequate (or any) consultation with stakeholders and landholders has taken place on the proposal;
- Local and wider public interest matters;
- Native Title Claimants: **Gnulli**– WAD6161/988; WC97/28; Reg: 14/04/1997; Current Status: Active - In mediation. The area size is 87,876.380 sq kms; Local Government Regions - Shire of Ashburton; Shire of Carnarvon; Shire of Exmouth; and Shire of Upper Gascoyne.

Specific Comments

The DoW observes that:

- No information has been provided on contact details for property owners/ developers within the proposed area;

- No documentation has been provided as to whether there are customers who might choose not to be serviced under the proposal;
- No information is available regarding consumption charges that may be applicable in the amended area;
- No information has been provided as to revenues anticipated in the amended area and if these will cover the direct costs of service provision;
- No details have been provided as to the completion of exploration permits or allocations from DEC that may be relevant to the provision of services in the amended area;
- The number of anticipated new connections by customer type in the amended operating area are not provided;
- There is insufficient information provided as to whether the amended area should be designated as a Greenfield site for the purposes of the proposed service;
- It is unclear/unknown if all relevant stakeholders have been identified and informed of the proposed extension;
- No defining principles have been outlined as to the Cooperative's obligation to supply water services to customers in the amended area;

Yours sincerely

John Hannan
Program Manager Water Services Policy
11 October 2007