

20<sup>th</sup> Dec 2010

Mr Lyndon Rowe  
Chairperson,  
Economic Regulatory Authority  
PO Box 8469  
Perth BC WA 6849

## **WACOSS SUBMISSION ON SECOND DRAFT REPORT ON WATER RESOURCE MANAGEMENT AND PLANNING CHARGES**

Dear Chairperson,

WACOSS thanks ERA for the opportunity to comment on *the second draft report on water resource management and planning charges* which specifically sets our indicative fees and charges for some of the water resource management and planning services provided by the Department of Water.

### **About WACOSS**

The Western Australian Council of Social Service (WACOSS) is the leading peak organisation for the community, and represents 300 member organisations and individuals, and over 800 organisations involved in the provision of services to individuals, families and children in the community. Each year, WACOSS member organisations deliver community services to hundreds of thousands of West Australians.

WACOSS is part of a national network consisting of State and Territory Councils of Social Service, and the Australia Council of Social Service (ACOSS). Our national coverage strengthens our capacity to represent the interests of low income and disadvantaged West Australians across the breadth of State and National agendas

### **Our Submission**

WACOSS welcomes the Authority's second draft report on water resource management and planning charges as an important step to appropriate cost recovery and establishment of long run regulatory arrangements that will facilitate efficient cost allocation amongst public and private parties.



**wacoss**

Western Australian  
Council of Social Service Inc

*Ways to make  
a difference*

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*Ways to make a difference*

WACOSS is particularly appreciative of the principles used in applying water resource management and planning charges as they are based on the pricing principles adopted in the National Water Initiative. WACOSS notes that the WA Government is a signatory to the National Water Initiative since 2006 and that the adoption of these guidelines for implementing water pricing commitments is an important step in achieving the objective of uniform approaches to pricing and attributing costs of water planning and management.

WACOSS also supports the Authority's decision to bring transparency and accountability in fee setting so that all stakeholders are aware of what is being charged to them and why.

With regard to recovery of water resource management and planning charges incurred on public water works, from public funds, WACOSS is concerned that households living on fixed and low incomes who are already struggling with rising utility prices may not be able to bear the brunt of a pass-through of these charges. WACOSS stresses that these charges must be objectively scrutinised by the Authority during its review of the Water Corporation's water charges.

### **Disclaimer**

Absence of comment on any portion of the second draft report or related preceding documents does not imply WACOSS's consent to the matter. No part of this submission is confidential.

### **Contact**

Please feel free to contact Aditi Varma- Senior Policy Officer, Essential Services, should you have any queries regarding this submission.

Thank you.

Yours sincerely,

Irina Cattalini  
A/CEO  
WACOSS