



Blundstone Arena - Bellerive
15 Derwent Street
Bellerive TAS 7018

PO Box 495 Rosny Park
TAS 7018 Australia

Telephone: +61 3 6282 0400

Facsimile: +61 3 6244 3924

Email: events@blundstonearena.com.au

Website: www.blundstonearena.com.au/function-centre

Tasmanian Cricket Association trading as Cricket Tasmania
ACN 009 476 993 ABN 34 009 476 993

21st March 2022

Office of the Tasmanian Economic Regulator

GPO Box 770

HOBART TAS 7001

TASWATER'S PRICES AND SERVICES FOR THE PERIOD 1 JULY 2022 TO 30 JUNE 2026

This letter is in response to the regulators investigation into Tas waters (TW) Draft Pricing and Servicing Proposal Four (PSP4). We are extremely surprised that no changes have been made to the Equivalent tenement (ETs) methodologies that are being applied to non-residential customers like ourselves. As per below table clearly shows we are being currently overcharged in the vicinity of ninety ETs per year or sixty thousand dollars per year. We are extremely disappointed that Tas Water and the regulator are proposing that this overcharging and inaccuracy is going to continue for another four years.

Current Ets	Total Usage KL Annually 18/19	Rain Bird Usage KL Annually 18/19	Total KL that could place load on TW	Accurate Ets using Discharge factor 2018/19
Current 152.6	25661	12445	Total Blundstone 25661 KL - Rain Bird 12445 KL= 13216 KL	13216KL x 0.95 / 200KL = 62.7 Ets

The charging of ETs needs to reflect the actual loads and potential loads we are or could be placing on the TW system. Currently we are charged far more than any potential loads we could ever be placing on the system. As explained in our previous submission to the regulator we have perfectly accurate information and data in relation to our water usage and the potential loads we could place on the TW infrastructure. We have provided this information to TW and the regulator to show how inaccurate and unfair the current applications of ETs are in relation to Blundstone arena. We cannot understand how a Standard Discharge Factor (SDF) cannot apply to our site. The information to apply a SDF is readily at hand for TW. It would provide an accurate and fair assessment of our sites potential loads that it could place on the TW system. There is no excuse for TW to knowingly continue to overcharge us in the order of two hundred and fifty thousand dollars over the next four years.

We believe it is the regulators responsibility to ensure we and other commercial customers are charged accurately and fairly. No business should be allowed to deliberately overcharge customers for an essential service. TW is an essential service provider and the only one of its kind in Tasmania

we cannot seek supply or servicing elsewhere, it is therefore integral for all Tasmanian customers to be charged accurately and fairly. This is currently clearly not the case for us and many other commercial customers who are being assessed as operating three hundred and sixty-five days a year at full capacity. We strongly request that the regulatory reassess TW proposal in relation to charging of ETs for non-residential customers, particularly in relation to customers like ourselves who are clearly being significantly overcharged.

We are more than happy to provide further evidence and information to the regulator in relation to this matter.

If anything is required or if you have any questions, please feel free to contact me directly.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Brad Millwood', with a large, sweeping flourish at the end.

Brad Millwood

CFO – Cricket Tasmania