

To: Office of the Tasmanian Economic Regulator

Submission in relation to the Regulator's draft Report

The new inclusion of an equivalent tenement (ET) category of RE02 – Multiple Residential Dwellings in TasWater's PSP4 (Appendix 15 Table A15.1, page 370) to categorise multiple dwellings on a single title has, in my view, clearly been created to unfairly target properties like mine that TasWater supplies with a single water supply.

A single Torrens title property is clearly different from a multiple Strata title unit complex as the former property has a single title whereas a Strata complex has multiple smaller Strata titles. A single Torrens title property should be a single ET for sewerage regardless of its internal structure; to charge more than one ET would be tantamount to "double-dipping" under Regulation 11 of the *Water and Sewerage Industry (Pricing and Related Matters) Regulations 2021* (Tas), as made under section 68 of the *Water and Sewerage Industry Act 2008* (Tas).

A fixed sewerage charge based on average water supplied (Table 8.2 Item 4, page 89) would make the most sense. If there is only one water supply to one property, then there can only be one proportional sewerage charge, not six ETs on a single Torrens title property that has just one water supply and no new sewerage infrastructure required let alone put in place to justify a sudden increase of sewerage charge from one ET to six ETs.

I too am not supportive of the ET methodology for sewerage charging. The ET methodology is not reflective of the actual load on the sewerage system by the property and therefore, in my submission, should be discontinued.

Furthermore, in my submission, even if TasWater were justified to charge six ETs for a single Torrens title property (which I have submitted above it is not), in any case, TasWater is only proposing to add ET category RE02 into PSP4 which comes into effect from 1 July 2022. As such, I submit that it is clear that TasWater is legally not entitled to charge ET category RE02 before PSP4 is approved and comes into effect.