

To: Office of the Tasmanian Economic Regulator

### **Submission in relation to the Inquiry into Sewerage and Trade Waste Charging**

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

Instead, a fixed sewerage charge based on average water supplied 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 would agree with the potential option noted in the Jacobs' report at [11.2.] that residential sewerage customers are charged a fixed charge only that is not based on the ET methodology, but a fixed charge set based on an estimated use of the wastewater system that is based on the average water supplied to a residential dwelling.

Furthermore, the new inclusion of an equivalent tenement (ET) category of RE02 – Multiple Residential Dwellings in TasWater's PSP4 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).

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 had only proposing to add ET category RE02 into PSP4 which had only come into effect from 1 July 2022. As such, I submit that it is clear that TasWater was legally not entitled to charge ET category RE02 before PSP4 was approved and came into effect, and to do so was to add to the injustice, and should never have been allowed to happen.

It also does not make sense for TasWater to be allowed to commence PSP4 BEFORE the conclusion of this inquiry. Why would PSP3 simply not have been extended (again) until the completion of this inquiry so that the results from this inquiry can be incorporated into formulating PSP4? Now it would not be until at least 2026 before a PSP5 incorporating the results of this inquiry would take effect.