

The electricity pass through mechanism proposed by Sunwater is founded on the principle of passing charges on to customers that are as near as possible to actual costs incurred rather than an estimated use that is built in to prices for the life of the price path. I agree, in principle with this concept particularly in consideration of the results of the AECOM investigation into prudent and efficient electricity costs which indicated that the annual cost of electricity in the Three Moon Creek Scheme should be about \$9000 as opposed to the \$22000 suggested by Sunwater in its submission.

I note also the QFF letter of support that provides in principle support only to the proposal and suggests that more refinement is required.

Personally, I feel that the concept is sound but the implementation could be unwieldy and inefficient and could only be supported if there was complete transparency by Sunwater in terms of its electricity usage. I am also concerned that under the proposal the cost of a QCA review is to be met by customers. The cost of a QCA review would be significant and is likely to prevent such a review being undertaken which undermines the integrity of the proposal. My view is that this cost, should it arise, should be met by Government as part its responsibility to ensure that its GOCs are providing a fair and transparent service to its customers.

Thank You the opportunity to comment,

Paul Francis