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18th February 2014

The Chief Executive Officer
Queensland Competition Authority (the Authority)
G.P.O. 2257
Brisbane Qld.4001
Attn. Ms. Cath Barker

QLD COMPETITION AUTHORITY

20 FEB 2014

Dear Ms Barker,

DATE RECEIVED

Please consider the following public submission regarding the Authority's 2013-15 SEQ prices monitoring draft reports for water and sewerage services provided by Government Monopoly Business Activities that are natural monopoly services.

Draft Report "B" for Unitywater Table 59 page 72 suggests the budgeted charges for 2013/14 and 2014/15 will under recover estimated legitimate costs. This finding is flawed because the derivations of RAB for both Unitywater and Queensland Bulk Water may be inflated and have not been independently verified by the Authority due to restrictive terms of reference for this investigation, or by the council owners of Unitywater under provisions of the Local Government Act by failing to perform prices oversight (see Koerner Submissions No. 1 – 11).

The Authority's duty to households in Coolum Beach and throughout the Sunshine Coast is to have regard to protection of consumers from abuses of monopoly power in performing price monitoring investigations and to take into account matters relevant to the public interest in issuing prices monitoring investigation reports. Draft Report "B" has not afforded due process by failing to consider the forensic documentation provided by Coolum Beach stakeholders as invited public submissions. Consequently public statements by the Authority suggesting no evidence of predatory pricing practices by Unitywater in the 2013-15 budgets are unwarranted and detrimental to the public interest.

Yours sincerely,


R.J. Koerner