LAPCSESC
Law Reform
Submission 016

HopgoodGanim
LAWYERS

19 January 2012

Research Director
Legal Affairs, Police, Corrective Services and Emergency Services Committee
By email: lapcsesc@parliament.qld.gov.au

Our Ref: 0720810 - Anthony Pitt

Dear Sir/Madam

Law Reform Amendment Bill 2011 (Qld)

Preliminary

1. We act for the Caravan Parks Association of Queensland Inc.

2. Our client is the peak industry body that represents the interests of, and has as its members (amongst other categories of members), residential park owners operating in Queensland under the *Manufactured Homes (Residential Parks) Act 2003* (Qld) (**"the Act"**).

3. On 1 December 2011, the Attorney-General, the Hon. Paul Lucas, introduced the *Law Reform Amendment Bill 2011* (**"the Bill"**) into the Queensland Parliament, and the Committee has called for Submissions in respect of the proposed amendments contained in the Bill.

4. Clause 102 proposes to amend Section 99A of the Act.

5. This email is to be taken as a Submission to the Committee, pursuant to instructions from and authorised by our client, in respect of Clause 102 of the Bill as it applies to Section 99A of the Act, for the Committee's consideration.

Current position

Electricity Act 1994 (Qld)

6. Some residential park owners choose to purchase electricity in bulk for the purposes of on-supplying it to home owners for their individual use. Park owners that do this may be classified as "electricity on-sellers" for the purposes of the *Electricity Act 1994*.

7. Under the *Electricity Act*, generally speaking, where electricity is on-supplied on a metered basis, the rates of charges for electricity must not be greater than certain stipulated rates, and these rates are published by the Queensland Government in an easy to follow "ready reckoner" (the current version of which is **attached**).

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8. We are instructed that the "ready reckoner" was introduced by the Queensland Labor Government in the 1990's to overcome problems that were being experienced with respect to:

   (a) how electricity charges were to be calculated; and

   (b) disputes as to what electricity charges should be.

9. The "ready reckoner" was introduced to create certainty with respect to these issues and avoid unnecessary disputation. We are also instructed that, initially, the "ready reckoner" included tariff rates only, but later the Queensland Labor Government introduced the "service fee" as well.

10. The precise words used in Section 20J of the *Electricity Act* are relevant and are as follows (with our emphasis):

> *"(1) This section applies if electricity supplied and sold by an on-supplier to a receiver is charged on the basis of the receiver's electricity consumption as measured by a meter.*
>
> *...*
>
> *(3) If there is a relevant retail entity for the supply, the rate of the charge must not be more than the lowest rate that the receiver would have paid for the consumption had the receiver been a non-market customer of the entity.*
>
> *(4) If there is no relevant retail entity for the supply, the rate of charge must not be more than the lowest rate that the receiver would have paid for the consumption had the receiver been a non-market customer of the retail entity that sells electricity to the on-supplier."*

11. Tariff 11, effective from 1 July 2011, is the current approved charge for the on-supply of electricity to domestic customers under the "ready reckoner", and the charge which residential park owners previously utilised when charging home owners for their usage of electricity. We are instructed that this tariff is no different to the tariff that home owners would pay if they obtained their electricity direct from an electricity supplier.

12. The use of the tariff rates set out in the "ready reckoner" had the approval and authorisation of the Queensland Government, and was an easy method for all residential park owners to follow. Home owners also clearly knew the rates at which they would be charged for their usage of electricity, such that there could be no doubt or confusion about their utility accounts. If a residential park owner charged a home owner at a rate that was in excess of the rates set out in the ready reckoner, this could be clearly identified by the home owner and the issue could be actioned and rectified.

Section 99A of the Act

13. The *Manufactured Homes (Residential Parks) Amendment Act 2010* (Qld) enacted Section 99A of the Act with respect to utilities. The Schedule to the Act defines *"utility"* to include, amongst other things, *"electricity"*.

14. Section 99A of the Act is currently as follows:

> *"**99A Separate charge by park owner not to be more than cost of supply for use of utility***
>
> *(1) This section applies if—*

(a) under a site agreement, the home owner is required to pay the park owner for the use by the home owner of a utility at the site; and

(b) the use is separately measured or metered.

(2) The park owner must not charge the home owner an amount for the use of a utility that is more than the amount charged by the relevant supply authority for the quantity of the service supplied to, or used at, the site.

Maximum penalty—20 penalty units."

15. Notably, the Queensland Government did not engage in any form of consultation with relevant stakeholders as to Section 99A or the issues that it concerns prior to its enactment. Prior to the Amendment Bill that contained the proposed Section 99A being presented to Parliament in June 2010, a draft Bill was released for consultation in December 2009 and various meetings were subsequently held with stakeholders and submissions were sought in respect of it. The draft Bill did not contain Section 99A, nor did it contain any provision that dealt with any of these issues. The Government did not flag that this was an issue, nor did it seek comment on the issue. As such, no consultation on the issue occurred. Respectfully, we are of the view that this lack of consultation has caused the Government to now find itself in the current predicament as to the impracticalities associated with how Section 99A applies to the on-supply of electricity by park owners to home owners.

16. To exacerbate the above, when Section 99A was enacted in November 2010, the extrinsic material to the Bill (that is, the Explanatory Notes to the Bill and Hansard) was silent as to the intended meaning of Section 99A. No other document sheds any light on the Government's intention behind the Section 99A amendment.

17. Accordingly, since its enactment in November 2010, the interpretation to be given to Section 99A was the cause of much conjecture within the residential park industry and gave rise to considerable uncertainty and angst for both park owners and home owners. Indeed, until recently, no guidance as to these matters had been provided by the Queensland Government.

18. One year later, in November 2011, the Director-General for the Department of Communities released a letter to park owners, which purported to explain the Department's view as to the meaning of Section 99A of the Act. In our view, this is not a statement of the Government's intention at the time Section 99A was enacted, but is merely a subsequent statement as to what the Department thinks Section 99A means. In any event, amongst other things, the letter stated:

"*Applying the rates in the Ready Reckoner without regard to the actual cost is not consistent with section 99A of the Manufactured Homes Act, any may constitute a breach.*

...

It has been discovered some park owners are adding meter reading fees, account fees, infrastructure and administrative charges in excess of the actual cost of supplying the electricity to residents. The policy intent of section 99A of the Manufactured Homes Act is to prevent the imposition of these kinds of charges."

19. Representatives of the Department of Communities have since verbally advised park owners that park owners ought to now comply with Section 99A of the Act by performing the following calculation:

(a) obtain the total bill for electricity to the park owner for the period;

(b) divide the total bill amount by the total quantity of electricity consumed, which results in a per kilowatt price;

(c) apply that price to all metered points in the park.

20. The above verbal advice and/or the "averaging" calculation has not been confirmed in any legislative or other written form. In our view, this verbal advice does not accord with what Section 99A actually says. If it did, then Section 99A would say it, but it does not.

Proposed amendment to Section 99A of the Act

21. Following the release of the above letter, on 1 December 2011, the Bill was introduced to Parliament. In Hansard, Mr Lucas stated:

> *"In March 2011, a new section 99A of the Act commenced to provide a clear framework for the way a park owner may recoup the costs for the on-supply of a utility. The provision was developed with the intention of prohibiting residential park owners from charging manufactured home owners more than the supply price for utilities and to prohibit additional charges for the on-supply of utilities, such as electricity. However, its operation has proved unclear as to its interpretation. The Bill seeks to ensure the section gives effect to its original policy intent, balancing park owners' commercial needs and consumer protections for generally low-income manufactured home owners."*

22. The Explanatory Notes to the proposed amendment to the Act in the Bill state:

> *"New provision section 99A(2)(a) will allow park operators to negotiate an administration fee for the provision of utilities and have that fee stipulated in the site agreement.*
>
> *The amendment is intended to hinder profiteering and the arbitrary charging of additional fees on utility bills to home owners. Park owners will be able to recoup the legitimate costs for the provision of a utility because they will be able to pass on those legitimately invoiced charges to home owners.*
>
> *New provision section 99A(2)(b) provides a head of power under the legislation to prescribe valid charges, fees or amounts for the provision of a utility by regulation should it be deemed necessary."*

23. With the proposed amendments, Section 99A of the Act will be follows:

> ***"99A Separate charge by park owner not to be more than amount charged for provision of utility***
>
> *(1) This section applies if—*
>
> *(a) under a site agreement, the home owner is required to pay the park owner for the use by the home owner of a utility at the site; and*
>
> *(b) the use is separately measured or metered.*
>
> *(2) The park owner must not charge the home owner an amount (the **relevant amount**) for the use of a utility at the site that is more than the amount charged by the relevant supply authority for the provision of the utility at the site unless the relevant amount –*
>
> *(a) is stated, in the site agreement, for the provision of the utility at the site; or*
>
> *(b) is prescribed for this section under a regulation.*

Maximum penalty—20 penalty units."

Submissions as to the proposed amendment to Section 99A of the Act

General

24. In our respectful submission, the Bill does not remove any ambiguity in relation to Section 99A. Despite the proposed amendment, Section 99A remains infected by confusion and ambiguity such that these problems will remain. These issues have been canvassed with the Department of Communities on numerous occasions and we will not again repeat them here. However, suffice to say, these problems are yet to be adjudicated upon by the Queensland Civil & Administrative Tribunal or the Courts, but as long as they remain, that will be the most likely outcome.

25. Further, the proposed amendment raises numerous issues that the Committee ought to consider in reviewing the amendment, the result of which will be that:

    (a) it will be impossible for park owners to strictly comply with Section 99A;

    (b) the alleged purpose of Section 99A will be rendered nugatory; and

    (c) home owners will be disadvantaged by Section 99A and the amendment.

26. We elaborate further on these issues below.

Park owners will be unable to strictly comply with Section 99A

27. The amendment requires the park owner to pass on to the home owner *"the amount charged by the relevant supply authority for the provision of the utility at **the** site"*. The focus of the provision is *"the"* site, that is, the individual home owner's site in question. The focus of the provision is not on *"a"* site at the park or an *"average"* site at the park as contemplated by the Government's "averaging" calculation above.

28. The amendment therefore requires the park owner to calculate the exact costs of the electricity used by an individual home owner. The only way that a park owner can do this is to install a smart meter at each site. Smart meters provide the only method to determine how many kilowatts are used by home owners in peak and off-peak times, as standard meters only measure general consumption.

29. From what we understand, the majority of parks do not have such metering systems installed at home owners' sites. Needless to say, the cost of installing such individual meters at all sites in the park would be significant, and would cause significant detriment to park owners.

30. There are various charges levied upon park owners by electricity suppliers that must be taken into account in calculating the relevant cost of electricity used by a home owner. Park owners will somehow have to resolve these issues in correctly passing on electricity charges to home owners. These issues include the following:

    (a) **Time of use** – Crude apportioning of total park peak and off-peak kilowatt quantities to calculate an individual home owner's usage would be inaccurate, unfair and inequitable for home owners. Such a framework does not consider the difference between occupiers using electricity in peak and off-peak times, nor does it consider any energy saving steps that may have been taken by certain occupiers in a park but not other occupiers. Those who take such measures or use electricity in off-peak times will lose the benefit of those steps by the "averaging" process suggested by the Government. Similarly, a park owner may have invested in energy saving measures

or shifted energy usage to off-peak periods in park-owned assets, only to have these savings shared by some occupiers that do not take such steps.

(b) **Peak KwH demand** – The demand for electricity fluctuates on a monthly basis, depending on vacation periods and seasons (extreme hot and cold weather) especially in mixed-use parks that also have caravan and tourist sites. In those circumstances, apportioning costs to occupiers becomes difficult and inconsistent when electricity use is not constant. For example, a home owner's electricity charges will be higher if the park is full with holiday makers during the tourist season – this circumstance is beyond the home owner's control and is arguably unfair to the home owner. The shifts in park occupancy and different site types in mixed-use parks, makes the ability to calculate the cost of electricity to a site a variable and uncertain science.

(c) **General usage areas** – Parks containing manufactured homes (both mixed-use parks and purpose-built manufactured home parks) also contain general facilities that utilise electricity. Any attempt at apportioning bulk electricity costs would also require sub-metering on all general community circuits so that the precise kilowatt usage of these facilities could also be calculated. The time of usage would again be relevant as some of the usage would be at off-peak times, such that a smart meter is required. Some general lighting will also be on the same circuit that feeds a site or a group of sites, so each individual fixture will require sub-metering by way of a smart meter. Unmetered powered tourist caravan sites would also require sub-metering by way of a smart meter. The costs involved in establishing sub-metering systems would be significant, and may be unnecessarily burdensome if the park is a mixed-use park with only a small number of manufactured home sites that need to comply with Section 99A of the Act.

(d) **Network charges on market demand** – Electricity suppliers' network charges fluctuate based on various parameters that are outside the control of a park owner or an individual site occupier, and changes to these are immediate and without notice. There are over ten different network charges that would need to be apportioned separately for exact usage charges to be able to be calculated. This could only be performed after the bulk bill for the period is received, which means that there will be a delay in billing to home owners. Difficulties will also arise in calculating an occupier's electricity charges where the occupier has not occupied the site for the full billing period.

(e) **Inequity to home owners**. As mentioned above, if home owners engage in any energy saving measures or shift their usage of electricity to off-peak times, they will not obtain the benefit of those measures.

31. As we refer to below, the above issues will result in a substantial amount of further administrative work, expense and time that park owners are required to expend just to be able to bill home owners for their usage of electricity and for which park owners will not receive any compensation.

32. Without all of the above matters being addressed, it is impossible for park owners to strictly comply with Section 99A and/or the amendment. As such, in our respectful view, Section 99A and the amendment is flawed in numerous respects.

Park owners will be required to draft new site agreements

33. Should the proposed amendment to Section 99A come into effect, park owners will be required to draft new site agreements for existing home owners in order to comply with Section 99A(2)(a).

34. Currently, a service fee per metering point (for example, the service fee detailed in the ready reckoner) is not stated in the site agreement or included in the site rent increase formulae in the site agreement. Drafting new site agreements would be a lengthy and expensive process, which, if contested, may result in litigation with home owners before the Queensland Civil and Administrative Tribunal.

35. The amendment ought to permit park owners to insert clauses in existing site agreements so that the right to pass on such service fees is not lost with respect to existing home owners by reason of this amendment.

The amendment will not achieve its intended purpose as park owners may simply no longer purchase electricity for the purpose of on-supplying it to home owners

36. By reason of Section 99A and the proposed amendment to it in the Bill, there will actually be a disincentive for park owners to continue to purchase electricity in bulk for the purposes of on-supplying it to home owners. Park owners will be better off extracting themselves from these arrangements and leaving it to a separate electricity supply company to supply electricity directly to home owners. If that occurs, home owners will pay the rates set out in the Tariff 11 ready reckoner and the whole purpose of Section 99A will be rendered nugatory. That is, "bulk" discounts will be lost to these consumers. Numerous park owners have indicated to us that this is their intention moving forward. Respectfully, the purpose and intent of Section 99A and the amendment is circular as it will not achieve its purpose, indeed quite the opposite in terms of the acquisition of this utility at the most reasonable cost, and therefore, is flawed.

37. Generally speaking, park owners who on-supply electricity to home owners also own all of the electrical installations located in the park. These include electrical cabling, distribution boxes/pillars, transformers, individual meter boxes and fuses to each site in the park. The park owner would have privately funded the ownership of this electricity network in the park and the responsibilities that come with that. In this regard, the park owner must attend to all maintenance of the electricity grid, as well as any upgrades of the grid that are required to be undertaken from time to time. The park owner must also undertake various tasks to read the meters as well as the various administrative tasks of billing all home owners for their usage and receiving home owners' payments. Some park owners also administer the electricity rebate scheme for pensioner home owners. If park owners are unable to receive any recompense for these responsibilities and costs that are incurred, park owners will simply not bother with this process and will move to extricate themselves from such arrangements as soon as they are able to do so.

38. However, if park owners cannot simply "hand back" this infrastructure to an electricity supplier, park owners will be disadvantaged by being forced to continue to maintain such infrastructure without appropriate revenue for doing so being received from home owners.

39. Further, if park owners have negotiated arrangements for the purchase of bulk electricity, such arrangements are usually for a term and cannot be changed or "gotten out of" easily or in some cases at all, such that the park owner may be "locked-in" to these arrangements and thereby disadvantaged. Needless to say, park owners will seek to exit themselves from those arrangements at the earliest opportunity at the end of that period.

Section 99A and the amendment will ultimately disadvantage home owners

40. Whilst the alleged policy intent of Section 99A sounds advantageous to home owners in theory, in practice it will amount to the opposite. It is submitted that Section 99A and the proposed amendment will operate only to ultimately disadvantage home owners by reason of the following:

(a) From the above, it is plainly obvious that park owners will be put to significant further expense and cost in seeking to comply with Section 99A. Suffice to say, the regime contemplated by Section 99A will cause an administrative nightmare for park owners seeking to comply with it. The administrative costs each month in an effort to calculate each home owner's electricity account will be oppressive. In addition, metering can be performed by specialised companies for parks that have new market contracts and these costs alone are about $1,500 per year. Such increased costs will only lead to a substantial increase in site rent fees to compensate for these increased costs to park owners. Again, numerous park owners have informed us that their intention is to immediately notify home owners of an increase in site rent upon the quantification of such increased costs. Assuming these increases will be disputed by home owners, this will result in increased disputation between park owners and home owners and litigation before the Tribunal. The amendment will disrupt harmony at residential parks.

(b) It is voluntary for park owners to participate in the pensioner rebate scheme for electricity for home owners. This process must be undertaken by the park owner with their electricity supplier, and cannot be undertaken by the home owner directly. Currently, the majority of park owners undertake the process of completing all paperwork to claim the pensioner rebate for home owners that are eligible for it. However, we are informed that this process is costly and time-consuming. With the added burdens upon park owners caused by Section 99A and the amendment, and the intention to remove any compensatory component associated with the administrative requirements of the supply of electricity, park owners will no longer wish to spend the time and effort to engage in this process for their home owners for no reward. Again, numerous park owners have expressed to us that they will no longer be obtaining pensioner rebates on behalf of their home owners.

(c) Home owners may be subject to fluctuating electricity tariffs based on market rates and peak demand fluctuations (for example, due to high holiday occupancy in any given month (as referred to above)). Home owners who engage in energy saving measures will also be disadvantaged as they will not reap the direct benefit of their efforts (as referred to above).

(d) Section 99A and the amendment will result in absurd and inequitable outcomes. In this regard, we have been informed by some park owners that the tariff rate at which they purchase electricity is actually higher than the tariff rates set out in the "ready reckoner". This means that home owners at those parks are better off by the use of the "ready reckoner". Section 99A will, however, require the park owner to pass on the higher cost of electricity to home owners, such that those home owners will be required to pay more for their electricity by reason of Section 99A and the amendment. Surely the Government is not intending to plainly and obviously disadvantage home owners in this manner.

(e) Home owners will be confused in relation to the line items that appear on electricity bills. Market tariffs have multiple line items for consumption, network, peak demand, metering and regulatory charges such as the following:

(1) energy charge peak;

(2) energy charge off-peak;

(3) network charge – demand charge;

(4) network charge – standing charge;

(5) network charge – unit rate;

(6) market charge – ancillary services charge;

(7) LRET fees;

(8) Qld 13% gas levy;

(9) SRES fees;

(10) metering charges;

(11) NEMMCO pool fees;

(12) service fees.

This will confuse home owners and inevitably lead to increased disputation and litigation between park owners and home owners.

(f) As referred to above, in future, park owners will simply seek to:

(1) "get out of" any arrangements they have negotiated for the supply of electricity and let home owners be billed for their electricity direct from a separate electricity supplier at full market rates; or

(2) not bother negotiating tariff rates any better than those contained in the Tariff 11 ready reckoner, such that home owners will be required to pay the Tariff 11 rates in any event.

The suggested method of recouping the park owner's costs of supplying electricity and complying with Section 99A is flawed

41. In the letter from the Director-General of the Department of Communities in November 2010 that we referred to above, it also stated in respect of the issue of "additional fees":

> *"The site rent charged to home owners should include a component to cover the legitimate costs of providing utility infrastructure within the park. Should a park owner need to increase and/or adjust the amount of site rent to cover the costs outside of the terms of the Site Agreement, they may do so by following the procedures outlined in the Manufactured Homes Act."*

42. With respect, the above statement as to how this issue is to be dealt with fails to take into account how a site agreement operates between a park owner and a home owner. In this regard, we point out the following:

(a) The site rent that is paid by home owners is for renting the site in question. The site rent is not for electricity or costs associated with supplying electricity as these are separate and are billed to home owners separately. The same applies for telephone, gas, mowing, additional vehicles, additional occupants etc. To artificially relocate these fees into site rent does not make sense.

(b) A site agreement, whilst including standard and prescribed terms, also permits the parties to agree special terms. There are no restrictions as to what these special terms may be, as long as they do not contract out of the Act. These special terms can include specific additional charges or simply a provision for a park owner to levy additional charges as and when necessary. This is necessary and not unreasonable

considering site agreements are perpetual in nature and are intergenerational agreements by reason of the Act. If the parties agree to that arrangement, then that is a binding agreement between them.

(c) The suggestion that such additional costs can be recouped by way of a Section 71 Notice, and subsequent Application to the Tribunal, is misconceived. An increase in site rent under Section 71 of the Act is an increase outside of the terms of the site agreement. As a result, the bar is set very high for park owners to be able to prove their case and obtain the increase or any increase at all. Such cases are also time-consuming and park owners can expect to wait up to 1 year to receive a decision in such a case. Different Tribunal members may give different decisions leading to matters being in disrepute.

43. Instead, park owners ought to be permitted to recover such costs by way of the service fee in the "ready reckoner" or pursuant to the special terms of the site agreement.

The residential park industry will be placed at risk

44. In our submission, by reason of all of the above matters, the future for the development of new residential parks in the industry will be in jeopardy because proprietors will not be willing to invest substantial capital to install electrical networks when they will not receive any financial return on their investment.

45. Further, it is doubtful that Energex or any other electricity supplier would install and maintain an electricity network on private land.

What should be the position?

46. Before the enactment of Section 99A, as we understand our instructions, home owners have been charged for their electricity usage pursuant to the ready reckoner published by the Queensland Government. Home owners have not been disadvantaged because they have been paying for their usage of electricity at the same rate that is charged to all other persons who purchase on-supplied electricity.

47. The handy and easy to follow ready reckoner created certainty for park owners and home owners alike, reduced unnecessary administrative costs and kept home owners' site rents as low as possible. If a park owner incorrectly charged a home owner for their usage of electricity, this could easily be identified by the home owner and progressed further.

48. Section 99A and the amendment proposes to destroy this previous harmonious regime and replace it with one that:

(a) is riddled with ambiguity and uncertainty;

(b) does not achieve its intended purpose;

(c) creates unnecessarily burdensome obligations for park owners that are impossible to comply with;

(d) will disadvantage home owners;

(e) will place the industry, and the growth of the industry, at risk; and

(f) will be the subject of further disputes before QCAT.

49. In our respectful view, if the Government wishes to solve the ever growing problem with the shortage of housing, the Government needs to create measures that foster the growth of the residential park industry and the park owners that keep this industry alive. It should not create problems for the industry that will merely stifle it. The Government should work with the industry.

50. Consultation about these issues should occur before these problems are unknowingly created. Section 99A has created much angst and uncertainty amongst the residential park industry. We can inform you that we have received numerous calls from park owners about this issue. All of the issues we have raised in this Submission evidence the need and importance of consultation with the industry about these issues.

51. As stated earlier, the "ready reckoner" was introduced to overcome problems that were being experienced with respect to the manner in which electricity charges are to be calculated and disputes as to what electricity charges should be. Section 99A, effectively, reverses this position of certainty to recreate the problems that the "ready reckoner" was designed to overcome.

52. The Department of Employment, Economic Development and Innovation's website states that on-suppliers of electricity include :

> *"... shopping centre owners, caravan park owners, owners of manufactured home parks, owners of blocks of flats and Bodies Corporate associated with blocks of residential or commercial units."*

To exclude residential park owners from being able to utilise the "ready reckoner" is discriminatory of the residential parks industry and preferential to other industries.

53. In our submission, the simple solution to all of the above problems is to repeal Section 99A of the Act, remove Clauses 101 and 102 from the Bill, and confirm that the "ready reckoner" is the regime by which park owners are to charge home owners for their usage of electricity that has been on-supplied to them by the park owner.

Should you wish to discuss any aspect of the above Submission, please do not hesitate to contact us.

Yours faithfully

HopgoodGanim Lawyers

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Queensland Government

READY RECKONER for the MAXIMUM CHARGES to be applied in the ON-SUPPLY OF ELECTRICITY to DOMESTIC CUSTOMERS

Based on GAZETTED TARIFF 11 - Effective - 1 July 2011

Charge Rate for all Electricity Consumption c/kWh	
Without GST	**20.69**
With GST	22.76

NOTE: On-suppliers may charge the amounts, or less than the amounts, calculated from the Gazetted Tariff 11 rates. Legislation prohibits charging more.

Plus a Service Fee per metering point	per month	per 4 weeks	per 2 weeks	per week	per day
Without GST	**$7.96**	$7.33	$3.66	$1.83	$0.2617
With GST	$8.76	$8.06	$4.03	$2.02	$0.2879

NOTE: One fee applies to a customer, for all the meters of that customer located together e.g. in a switchboard.

Qld Government Electricity Rebate	Rebate per day	Rebate per 1 week	Rebate per 2 weeks	Rebate per 4 weeks	Rebate per Month [4]	Rebate per year [5]
Without GST	**$0.5740**	$4.02	$8.04	$16.07	$17.46	$209.51
With GST	$0.6314	$4.42	$8.84	$17.68	$19.21	$230.46

Total Customer Charge = Service fee + Consumption charge (c/kWh) * Consumption amount (kWh) - Rebate amount

NOTES:
(1) When an on-supply customer meets the rebate criteria, On-suppliers may agree to rebate the amounts shown. Legislation prohibits rebating less, except when the On-supply charge is less than the rebate shown above, in which case the rebate applied = the On-supply charge.

(2) The column indicating the 'Rebated' electricity charge represents the applicable charges that apply where, at the discretion of the On-supplier, on-supply Customers are allowed to claim the Queensland Government Electricity Rebate.

(3) The GST column included in the Ready Reckoners indicates the amount of GST applicable on the on-supply Customer's electricity charge. However, these calculations are an indication only and the Australian Tax Office or a tax consultant should be consulted for definitive advice on GST.

(4) Monthly rebate is based on an average month of 30.4 days (365/12).

(5) Yearly rebate is based on a 365 day year.