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Impact of Competition Policy Reforms Inquiry
Productivity Commission
PO Box 80
CANBERRA ACT 2616

Dear Sir/Madam

RE: IMPACT OF COMPETITION POLICY REFORMS - GEDC SUBMISSION

Enclosed with this letter is a copy of the Goldfields-Esperance Development Commission submission on the Productivity Commission Draft Report Impact of Competition Policy on Reforms on Rural and Regional Australia.

The GEDC is the State Government organisation responsible for the promotion of economic and social development of the Goldfields-Esperance region in Western Australia. This region is over 771,276km² in size with a population near 60,000 people. It contributes more than \$3 billion annually to the state's economy through industries in mining, agriculture, manufacturing and tourism.

The GEDC Report summarises current situation of the major infrastructure and service markets in the region and the impact National Competition Policy has had or is likely to have on them.

I hope this submission final report.

is of use to the Productivity Commission in the completion of its

Yours sincerely

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30 June 1999

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G E D C

GOLDFIELDS ESPERANCE DEVELOPMENT
COMMISSION

Response to the Productivity Commission Draft Report -
*Impact of Competition Policy Reforms on Rural and Regional
Australia.*

30 June 1999

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Summary

This report is the Goldfields-Esperance Development Commission response to the Productivity Commission draft report *Impact of Competition Policy Reforms on Rural and Regional Australia*. The GEDC has also done a report *Impact of the National Competition Policy on the Goldfields-Esperance Region* which was submitted to the Senate Select Committee on the Socio-economic consequences of the National Competition Policy.

National Competition Policy and infrastructure reforms are the focus of this report. Competitive and modern infrastructure is vital for the region's development. The GEDC believes that economic and social development in the region is intrinsically tied with infrastructure projects and services. While the region has had healthy growth in its resource industries over the last decade, this growth may be impeded if the region's infrastructure does not develop at the same pace.

The findings of the Productivity Commission's report relevant to the GEDC are:

- * While the size of regional towns have been stable nationally for the last 25 years, a number of Shires in the Goldfields-Esperance Region are experiencing population declines;
- * The region's isolation and small population is its major problem in creating a competitive market;
- * Some of the region's infrastructure and services are unlikely to ever have a competitive market structure;
- * The NCP will not lead to lower prices the region's electricity and gas markets;
- * NCP reforms in water infrastructure investment could solve some of the region's water problems;
- * While NCP road transport reforms would benefit the region, adequate road funding remains an issue; and
- * NCP does not appear to stop the leakage of freight movement from rail to road being promoted by public policy.

The GEDC believes that the National Competition Policy has the potential for significant impact on the economic and social development in the region. However, it is unlikely that the region will see major benefits from the policy due to its isolation and population.

GOLDFIELDS-ESPERANCE DEVELOPMENT COMMISSION

Economic Statistics of the Goldfields-Esperance Region

AREA 771,276. 1 km²

The region represents about a quarter of the state from the south coast north to the Tropic of Capricorn and east-west from Coolgardie to Eucla, the WA/SA border.

POPULATION	Estimated residential population 1998	58,391
ABS Census 1996		Regional Total 57,498
Population Density		0. 1 person/km ²
Male		31,812
Female		25,686
Over 65 years		2,261
% projected population growth 2001 to 2022		1.16%
Average Annual Growth Rate 1993-98		1.9%
Population projection to 2011		65,600
SHIRIES	(9 in the region) Estimated residential population 1998	
Coolgardie		5,332
Dundas		1,567
Esperance		12,831
Kalgoorlie-Boulder		31,191
Laverton		1,208
Leonora		2,712
Menzies		343
Ngaanyatjarraku		1,553
Ravensthorpe		1,454
MINING	Revenue in 1997/98	\$3.0b
Gold		\$2.2b
Black Granite		\$0.3m
Construction material		\$2.2m
Gypsum		\$0.2m
Limestone/Dolomite		\$1.5m
Nickel		\$814.0m
Cobalt		\$81.7m
Concentrates		\$722.2m
Paladium		\$6.7m
Platinum		\$3.1m
Silica Sand		\$0.4m
Salt		\$0.5m
NO. OF RURAL HOLDINGS 1996		739
AREA OF RURAL HOLDINGS 1996		17.5m hectares

AGRICULTURE 1996	Total Value	\$255.4m
Wool		\$61.5m
Cereals for grain crops		\$131.7m
Livestock slaughtered		\$44.0m
Wheat 1996		\$70.5m
Barley 1996		\$59.0m
Canola 1996		\$47.7m

GOLDFIELDS-ESPERANCE ECONOMY - 1996/97

Gross Regional Product	\$3.2b
Share of WA Gross Domestic Product	5.13% State GDP

RETAIL TURNOVER	1997			\$417m
MANUFACTURING	1994	82 locations	Turnover	\$437m
CONSTRUCTION	1996/97			\$122m
BUILDING	1996/97 Total approvals			\$12 1 m
	State			4.2%
	Avg Dwelling approved			\$101,615.00
	Non-residential			\$60.6m
TOURISM	1996 expenditure			\$109.3m
	No. of visitors			564,000
	Portion of state tourism			6.3%
FISHING	1996	2,374 Tonnes		\$10.1m
FORESTRY	1996/97	2,000 tonnes Sandalwood		\$7.5m
		2,070 tonnes native hardwood		\$20,000
EMPLOYMENT	Estimated labour force at 31/12/98			35,420
UNEMPLOYMENT	As at 31/12/98	4.6%		1,636

PERSONAL WEEKLY AVG INCOME \$423

ESPERANCE PORT AUTHORITY

30/6/98 Imports	404,490
Exports	2,675,421
No. of Vessels 119	Total trade 3,079,911

HEALTH

Kalgoorlie has a regional Hospital. Esperance, Ravensthorpe, Norseman, Leonora-Laverton have district hospitals. Nursing posts are situated at Coolgardie, Menzies and Kambalda. First aid posts at Coona & Tjuntjarra,

TRANSPORT

The region is the gateway to the eastern states via the Eyre Highway and the east-west rail line. Road networks connect the region to Port Hedland in the north and Esperance to the South.

Response to Productivity Commission Report

This report focuses on the Productivity Commission's findings on the impact of National Competition Policy on infrastructure. The GEDC has a particular concern on the impact of the NCP on electricity, gas, water, road and rail transport. These infrastructure issues are of critical importance to the development of the region and its industries. Consequently, any impact the NCP has on infrastructure will have a significant impact on the region.

General

There are some general points at the beginning of the Productivity Commission Report that need addressing.

Goldfields-Esperance Demographics

The PC report examines the demographic and structural changes occurring in regional areas. Some of the findings made by the PC are relevant to the Goldfields -Esperance Region.

The Goldfields-Esperance region is located in South-East Western Australia. This region is about 771,276km² in size, hosts a population of nearly 60,000 people, and contributes more than \$3 billion annually to the state's economy through industries in mining, agriculture, manufacturing and tourism. The region is made up of the City of KalgoorlieBoulder and the Shires of Coolgardie, Dundas, Esperance, Laverton, Leonora, Menzies, Ngaartyatjarraku and Ravensthorpe.

The PC states that the perception that small regional towns are "withering" is a myth and not supported by statistical data. For each ABS census conducted between 1971 and 1996, the share of national population by towns between 1000 and 19,999 people in size has hovered around 14 per cent (PC 1999: p 18). Further, the number of such towns increased by 50 per cent over this period because of a substantial rise in the number of least populous towns in this category. The GEDC does not argue with this finding but does wish to point out that shrinking towns are not a "myth" in the Goldfields-Esperance Region. Important regional centres have experienced negative population growth over the last five years including Coolgardie (-0.9% pa), Dundas (-2. 1 % pa) and Laverton (4.8% pa). Further, six of the nine shires in the region have had strong negative population growth in the last 12 months (ABS 1999: p75).

National Competition Policy

National Competition Policy aims to promote and create competition in sections of the economy dominated by government monopolies, typically infrastructure services. NCP is delivered by three agreements between the Commonwealth and State Governments which aim to facilitate competition to promote economic efficiency and also strengthen trade practices laws regulating competition. The three NCP agreements are:

* The *Competition Principles Agreement* sets out principles for reforming government monopolies, prices oversight of government business, reviews of legislation, access to some 'essential' infrastructure facilities and placing government businesses on a competitively neutral footing with each other and private businesses; * The *Conduct Code Agreement* extends Australia's competitive conduct rules to all businesses - unincorporated businesses were previously exempt; and * The *Implementation Agreement* re-commits governments to earlier reforms in gas, electricity, water and road transport. It specifies a program of \$16 billion in financial grants to State and Territory governments, contingent on implementation of reforms. (PC 1999: P. xxviii)

Also of significance in the NCP is the "public interest" test which provides for noneconomic factors such as social welfare and regional development concerns to be taken into account in the implementation of NCP. The aim of the public interest test is to help avoid unnecessary adjustment costs and dislocation in areas sensitive to NCP application.

Issues in the implementation and operation of NCP

One of the Productivity Commission's great concerns is the level of misunderstanding that exists in parts of the country about NCP aims, mechanisms and boundaries (PC 1999: p79). In particular, the Productivity Commission states that NCP is not responsible for downgrading of community service obligations as some have argued and that there is a great deal of uncertainty about the "public interest" criteria. It also makes the point that many economic and social changes that regional areas have experienced are not the result of the NCP.

The GEDC supports Recommendation 4.2 which recommends all governments publish and publicise the "public interest" provisions of the NCP and provide guidelines on how these provisions may be interpreted and applied (PC 1999: p86). If this recommendation was fully adopted, it would help many local government agencies in the region to have a better understanding of the NCP, particularly in awarding contracts that would be beneficial to the region (such as preference to local contractors) but may be perceived to be anti-competitive in nature.

While the GEDC does not believe NCP is responsible for the downgrading of community service obligations in the region, it does not believe it will help greatly rectify the situation. In its submission to the Senate Select Committee on the Socio-Economic Consequences of the NCP, the GEDC argued that the region is perceived to be too isolated or too small a market by many infrastructure service providers to warrant setting up there (GEDC 1999: p 12). As a result, the region will experience rising infrastructure service costs due to cutbacks in CSOs but will not be "compensated" by increased competition in infrastructure services.

The GEDC does not blame NCP for bank closures or shortages in government non-infrastructure services. However, the shortage of non-infrastructure services is systemic of the service delivery problems faced by the region. There is a teacher shortage problem in the region with between 8 to 10 teaching posts not filled at the present time. The

region's isolation from Perth; teachers in Perth being unwilling to move from their positions; and the perceived lifestyle and cost of living in the region are contributing factors.

A number of Shires in the region experience infrequent contact with medical specialists. Some 60 per cent of residents in the Goldfields-Esperance Region surveyed in the *Living in the Regions* report compiled by the Regional Development Council expressed "real concerns" about the lack of special medical services.

NCP-related infrastructure reforms

Introduction

The Productivity Commission states that NCP reforms to electricity, gas, water and road transport sectors will bring substantial gains to consumers. NCP infrastructure reforms involve the separation of regulatory and commercial functions, and the natural monopoly and potentially competitive components of service provision (PC 1999: p98).

As stated in the introduction, competitive and modern infrastructure is vital for the development of the Goldfields-Esperance Region. The GEDC believes that economic and social development in the region is intrinsically tied with the provision of infrastructure projects and services. While the region has had healthy growth in its resource industries over the last decade, this growth may be impeded if the region's infrastructure does not develop at the same pace.

While NCP is orientated to providing greater competition in infrastructure services, the GEDC is sceptical whether it can deliver such benefits to the Goldfields-Esperance Region. The region is isolated from most of the main infrastructure markets in Western Australia, which are isolated from many national infrastructure markets. Further, the regions size and small population limits against potential benefits available through competition.

Electricity

The City of Kalgoorlie-Boulder and the Shire of Coolgardie are connected to Western Power's South-West Interconnected Electricity Grid. The other seven LGA's in the region obtain electricity from Western Power isolated system stations or from private power generators (usually mining companies). The price of electricity in WA is the highest of all the States both for commercial/industrial and for residential tariffs (ESAA 1998). The Goldfields-Esperance Region is facing the situation of higher electricity prices due to WA Government reforms based on the NCP but no competition or new infrastructure services to compensate for this.

A case in point is the WA Government's changes to regional power tariffs. On June 15, 1998, State Cabinet endorsed a number of changes to Western Power's electricity tariff arrangements for regional areas. These changes were announced by the Minister for

Energy in **the Legislative Assembly on June 25th** . The two most important changes for the region were:

From 1 January 1999 the tariff schedule for the K2, L2, and M2 tariffs was altered to introduce a 20c / kWh rate of charge for all consumption over 300,000 kWh. The present reduced rate in these tariffs for consumption over 602,250 kWh pa is to be deleted (See Appendix A for current tariff regime); and A limited contestable electricity market is to be introduced only for large regional customers with electricity consumption above 300,000 kWh pa who are supplied by Western Power's 29 regional systems

Expressions of Interest for private power generation in the Shire of Esperance were advertised in *The West Australian* Saturday November 28th 1998 with EOI applications to be in by December 21 " 1998. On December 29th, the Minister for Energy announced that 23 organisations has submitted EOI. Of these groups, 17 were based in WA, five in the Eastern States and one from overseas. A shortlist of 12 selected proponents was announced on May 10th . These shortlisted proponents will be invited to submit detailed tender proposals for assessment by a steering committee, headed by the Department of Resources Development and involving the Office of Energy and Western Power. A decision on a proponent for the Esperance region is expected to be made by August.

It is clear that large regional power users are being used to further electricity competition in the WA energy market. The Minister clearly states in his press release that Western Power would use a competitive tender process to call for expressions of interest to establish new power generation plants in regional areas (Minister for Energy 25/6/98). The aim of this is to compensate larger energy users having to pay more for electricity. It is hoped that private generators may be a source of lower generation costs than Western Power for large customers. Also, State Government policy is moving Western Power further away from providing a community service at any price.

The GEDC contends that if the EOI process does not offer significant competitive alternatives to Western Power, much of the region will incur higher electricity prices. If this is the case, it will become more difficult to attract large new industries (particularly in value-adding) which are high electricity consumers to the region. This in turn will work against the aim of diversifying the region's economy and stifle economic growth.

The GEDC report *Summary of Energy Situation and Issues in the Goldfields-Esperance Region* found that a number of electricity issues that would work against the NCP having an impact on the region's energy market:

- * The dependence on resource projects to justify greater power generation in the region. There is there circular problem that many resource projects will not start unless there is an increase in power generation first, usually by government;
- * Some shires are too small a market to make any new electricity projects and expansions viable;

- * Most potential new generation projects are being designed or built in the private sector with a commercial not a community focus; and
- * There is still uncertainty over what the impact will be on regional communities and businesses with changes to Western Power's regional power tariffs.

Gas

The Productivity Commission states that prior to the introduction of NCP reforms to the gas market; "... *the dominance of a few producers, the existence of monopoly suppliers, the absence of interconnections between systems and a lack of third party access to gas pipelines, all served to limit competition in the gas industry. As a result, costs and prices were well above efficient levels and investors lacked incentives to expand the network. This penalised households and businesses alike* " (PC 1999: p 117). It is the GEDC view that this describes fairly accurately the state of the current gas market in the GoldfieldsEsperance Region.

The Goldfields-Esperance Region has only one supply of natural gas, the Goldfields Gas Transmission (GGT) natural gas pipeline. The GGT, which is owned by a private consortium, runs 1380km. from Yarloop in the North West of Western Australia to Kambalda in the Goldfields. The GGT has a current capacity of around 88 terajoules of gas a day which will be increased to 164 U/d when 8 compressors are installed (OOE 1998: p43). Access to the pipeline is governed by the *Goldfields Gas Pipeline Agreement Act 1994*. Aside from recognising priority access rights to a portion of initial pipeline capacity by the consortium or their associate, the Act provides for capacity to be available to third parties on a non-discriminatory basis at fair and reasonable tariffs.

One of the major power issues facing the region is the cost of GGT tariffs. One of the perceptions in the region is that GGT tariffs are too high and this is demonstrated by the fact that a lot of Kalgoorlie businesses are reluctant to enter into contracts with AlintaGas to deliver natural gas along the GGT to supply their energy needs. A prime example is Anaconda Nickel Ltd's decision to enter in joint venture with StateWest Power to build a \$ 100 million stand alone natural gas pipeline to supply the Stage 2 development of its \$1 billion Murrin Murrin laterite nickel project, some 60kin east of Leonora. The pipeline will connect to the Dampier Bunbury Natural Gas Pipeline in Geraldton and extend 600kin to Murrin Murrin. Stage 1 of Murrin Murrin is connected to the GGT but, because Anaconda's view that tariffs on the GGT are too high to be considered economic for Stage 2, the company has decided to build a separate pipeline.

The GEDC believes the price of natural gas is one of the major energy issues facing the region and does not think the NCP will significantly change the situation. AlintaGas has shown no interest to extend the D13NGP to the region itself as it is not considered economic. Anaconda Nickel's extension to Murrin Murrin is based on commercial, not community considerations so it is debatable whether this will see a fall in gas prices across the whole North-Eastern Goldfields. Further, extension of the GGT to the Shires of Esperance, Dundas and Ravensthorpe is not likely to happen as their market is simply too small. Similar to electricity reforms, the gas reforms embarked under the NCP are not likely to be felt in the region due to the region's small energy market and isolation.

Currently, the WA Legislative Council Standing Committee on Estimates and Financial Operations is investigating whether GGT tariffs are "fair and reasonable". The Committee is expected to report some time in late 1999 and the findings will be of great interest to the region.

Water

The Productivity Commission argues NCP water reforms seek to improve the economic viability and ecologically sustainability of water supply. The key reforms are in the areas of pricing reform; investment reform; water trading; and institutional reform (PC 1999: p 129).

Potable water for the City of Kalgoorlie-Boulder and the Shires of Dundas and Coolgardie comes from Mundaring Weir in Perth and is piped 600km to Kalgoorlie-Boulder via the Goldfields and Agricultural Water System pipeline. The Shires of Menzies, Laverton and Leonora are supplied by a combination of Surface catchment in dams and borefields. Esperance receives its water from an underground aquifer to the west of the town, which is tapped by bores. Ravensthorpe's water supply is sourced from dams near the town. A small local aquifer supplies Hopetoun.

Most Shires in the region face major fresh water problems. Some of the specific water problems include the high salinity levels in groundwater; the high cost of transporting water from Perth to Kalgoorlie via the Goldfields and Agricultural Water Supply pipeline; water quality; and questions whether the Perth water basin can continue to supply the region.

Anecdotal evidence suggests new residential developments are being deterred because of high water prices, and severe water restrictions in the region have acted as a disincentive for people wanting to build permanent residences and create new industries.

The key water reform relevant to the Goldfields-Esperance Region is investment reform which seeks investment in new rural water supply schemes, or in the extension of existing schemes, to proceed only if an appraisal indicates that it is economically viable and ecologically sustainable (PC 1999: p128). Two major water infrastructure projects are proposed for the region:

- * In February 1999, the Water Corporation issued its WaterLink report which identified a \$140m pipeline pumping seawater from Esperance to Kalgoorlie-Boulder as a new water source for the Goldfields. It is estimated that this pipeline could deliver 35ML daily to the mining industry at about \$1 per kilolitre. The Water Corporation has stated that funding of the pipeline would have to come from the private sector, with the Corporation prepared to help with the sale and distribution of the water.
- * An alternative project being proposed is a water pipeline pumping desalinated seawater from Esperance to Kalgoorlie. The project is being designed and developed by a local company, Goldfields Utilities Ltd. GUL plans to initially produce 100-110 ML, of potable water per day. Projected markets are: Esperance/Ravensthorpe area;

Norseman; Kambalda; Kalgoorlie-Boulder; and Southern Cross through the Goldfields and Agricultural Water Supply pipeline. The project is estimated to cost \$500m.

The GEDC strongly supports the Productivity Commission Recommendation 5.1 which states that; "*All benefit-cost studies of major new water infrastructure investments should be publicly available and should clearly identify the nature and magnitude of any social (including environmental) benefits*" (PC 1999: p 13 5). The GEDC also agrees with the Commission's observation that negative rates of return will be usual in the early years of such investments and should not invalidate the possible long-term net benefits.

Road Transport

The road transport reforms initiated under NCP are in six key areas: * Uniform heavy vehicle charges; * Uniform arrangements for transportation of dangerous goods by road; * Vehicle operation reforms covering national vehicle standards, roadworthiness, mass and loading laws, oversize and overmass vehicles, and road rules; * A national heavy vehicle registration scheme; * A national driver licensing scheme; and * A consistent and equitable approach to compliance and enforcement of road transport laws (PC 1999: pp144-5).

There is 19,715km of road in the Goldfields-Esperance Region, including sealed roads linking all major centres (except Wiluna and Meekatharra). Roads are critical to the region's economic development and maintenance is a priority (DT, GEDC 1999: p29). The Great Eastern Highway which links Perth to Kalgoorlie-Boulder, and the Eyre Highway which links WA to the Eastern States are part of the national highway system. Of regional significance are the highways which connect Esperance to Coolgardie and Kalgoorlie-Boulder, and Kalgoorlie-Boulder to Mt Keith and Laverton.

The GEDC supports the NCP reforms relating to road transport, particularly transport of dangerous goods and road rules. Most road transport issues in the region are related to the state of roads which do not fall under the jurisdiction of the NCP. Road projects that need funding include Lake Raeside Crossing, the Goldfields Highway (Bulong and Cawse sections) and the Outback Highway. If the NCP road reforms are to benefit the region, the region's road infrastructure needs to be maintained at a competitive standard and new road projects be encouraged.

The GEDC is concerned that public policy is favouring road transport at the expense of rail transport. Rail transport is an essential component of the Region's strategic transport infrastructure but the Esperance to Leonora line faces uncertainty because of the proposed privatisation of Westrail Freight Business. One of the GEDC's major concerns is that whatever privatisation option is chosen, the state of rail infrastructure in the region is not downgraded and the region benefits from lower freight rates through competition through lower freight rates.

Esperance is connected by a standard gauge rail line to Kalgoorlie. This line is used to move bulk commodities like diesel into the Goldfields and exports nickel concentrate and iron ore to Esperance Port. The rail line is a vital component of the region's strategic transport that supports the economic and development of the Port of Esperance and the Goldfields-Esperance Region as a whole.

The line is facing a number of critical issues. Portman Mining is evaluating using the Kwinana port instead of Esperance. Portman currently uses the line to transport iron ore from Koolyanobbing to the port for shipping. One of the main factors is that the railway to Kwinana is of a higher standard, which enables Portman to move higher tonnes more efficiently than on the Goldfields-Esperance line. Anaconda Nickel is also considering using the Kwinana line for its Murrin Murrin operation for similar reasons.

GEDC is concerned that Esperance could lose business because of a lower standard, and therefore uncompetitive rail line. Also, government funding through the Australian Rail Track Corporation is being allocated to improving major inter city line: regional or spur lines are being ignored. It is estimated that \$35m is needed to upgrade the Coolgardie to Esperance section of the line.

If Portman was to stop exporting iron ore along the line through Esperance, the Esperance Port Authority estimates that approximately 35 direct jobs would be lost in the town of Esperance (Source EPA 1998: p2). Other positions in administration and maintenance would also be lost due to the decline in use of the rail line.

Conclusion

GEDC believes that the National Competition Policy will be of negligible benefit to the region. The region's government infrastructure and service markets are unlikely to ever feel the full benefits offered from the NCP. This is due to the region's economy; isolation; population; and past experiences with other infrastructure policies and suggested benefits that have not been realised.

The GEDC concludes that there is still a strong role for government to play in the provision of infrastructure and services as a community service obligation. While the region does have a strong economy, the benefits flowing from this are not seen across the region and much of the population is isolated from reliable government services. Further, the region's continued economic and social development warrants a high level of government support. A withdrawal of government support from the region could see the strong economic performance of the last decade significantly diminish.

The Region's contribution to Australia's GDP has created an entitlement for standards of government infrastructure and service support that exceed the capacity of the NCP to deliver.

Point of Contact

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Appendix A

Western Power Regional Electricity Tariffs
Pre-1 January 1999 and Post-1 January 1999

Customer Type	No. of Customers	Pre- 1 January 1999	Post- 1 January 1999
A2 Residential	14,300	Supply Charge: 23.39 c/day Energy Charge: 12.75 c/day	No change
1,2 Commercial	3,180	Supply Charge: 24.91 c/day Energy Charge: 15.98 c/day	No change
	17	New step	20.00 c/kWh for consumption <i>above 300, 000 kWh per annum</i>
		Existing step: <i>14c/kWh for consumption above 602,250 Mh per annum</i>	Deleted
K2 Commercial with residence	1,335	Supply charge: 23.39 c/day Energy charge: 12.75 c/day for first 20 kWh per day. 15.98 c/kWh for consumption over 20 kWh per day.	No change No change
	4	New step	20.00 c/kWh for consumption <i>above 300, 000 kWh per annum</i>
		Existing step: 14.42 c/kWh for consumption above 602,250 kWh per annum.	Deleted
R2 Commercial Time of use	57	Supply charge: 144 c/day Energy charge: peak - 19 c/kWh off-peak - 6 c/kWh	Abolished