4th February 2011

Att: The Chairman
Electricity Supply Industry Expert Panel
PO Box 123
Hobart TAS 7001.

Re: Electricity Supply Industry Expert Panel - Statement of Approach – Request for Submissions

Chairman,

I hope and look forward to an opportunity to make active contribution into this extremely valuable process.

As Aurora representatives and the Auditor General, as indeed the Ombudsman and Economic Regulator will attest to, I have an unfortunately undeniable evidentiary knowledge of the effectiveness of both the internal and external governance regimes pertaining to Aurora Energy Pty Ltd derived from several years of investigation into another matter but with the same identifiable underlying issues.

Dealing with your areas of interest for submissions in turn;

Are there broad areas of interest that the Panel should consider addressing that it has not identified in this Statement of Approach?

Matter 1
Sound and effective decisions are based on accurate and timely information, be that the decisions of the Board of Directors, the relevant Minister or the Parliament itself.

There is a significant interaction between the nature of ownership (Government Business Enterprise under the Government Business Enterprises Act versus a State Owned Company incorporated under the Corporations Act (Cth) provisions) and the nature of the information properly provided to decision makers.

Under the Corporations Act(Cth), under which Aurora Energy Pty Ltd is incorporated, information is regulated by the likes of s1309.

> ***1309 False information etc.***
> *(1) An officer or employee of a corporation who makes available or gives information, or authorises or permits the making available or giving of information, to:*
>
> *(a) a director, auditor, member, debenture holder or trustee for debenture holders of the corporation; or*

(b) *if the corporation is taken for the purposes of Chapter 2M to be controlled by another corporation—an auditor of the other corporation; or*

(c) *an operator of a financial market (whether the market is operated in Australia or elsewhere) or an officer of such a market;*

being information, whether in documentary or any other form, that relates to the affairs of the corporation and that, to the knowledge of the officer or employee:

(d) *is false or misleading in a material particular; or*

(e) *has omitted from it a matter or thing the omission of which renders the information misleading in a material respect;*

is guilty of an offence.

(2) *An officer or employee of a corporation who makes available or gives information, or authorises or* ***permits the making available or giving of information, to:***

(a) ***a director, auditor, member, debenture holder or trustee for debenture holders of the corporation; or***

(b) *if the corporation is taken for the purposes of Chapter 2M to be controlled by corporation—an auditor of the other corporation; or*

(c) *an operator of a financial market (whether the market is operated in Australia or elsewhere) or an officer of such a market;*

being information, whether in documentary or any other form, relating to the affairs of the corporation that:

(d) *is false or misleading in a material particular; or*

(e) *has omitted from it a matter or thing the omission of which renders the information misleading in a material respect;*

without having taken reasonable steps to ensure that the information:

(f) ***was not false or misleading in a material particular; and***

(g) ***did not have omitted from it a matter or thing the omission of which rendered the information misleading in a material respect;***

is guilty of an offence.

(3) *The references in subsections (1) and (2) to a person making available or giving, or authorising or permitting the making available or giving of, information relating to the affairs of a corporation include references to a person making available or giving, or authorising or permitting the making*

available or giving of, information as to the state of knowledge of that person with respect to the affairs of the corporation.

(4) Where information is made available or given to a person referred to in paragraph (1)(a), (b) or (c) or (2)(a), (b) or (c) in response to a question asked by that person, the question and the information are to be considered together in determining whether the information was false or misleading.

(5) …

(6) …

Being mindful of the terms of Reference Item 8;

*"**TERMS OF REFERENCE***
The Expert Panel shall investigate and report on:

8. The advice that was provided to the State Government by the senior management or Directors of Aurora Energy from 1 October 2009 to 16 June 2010 inclusive."

Whilst the Tasmanian Audit Act provides;

21. Audit of subsidiaries of State entities

(1) An accountable authority responsible for the operations of a State entity is to advise the Auditor-General, in writing, before the end of the relevant financial year of all subsidiaries of the State entity.

(2) The Auditor-General is to be the auditor of a subsidiary of a State entity unless the Auditor-General determines otherwise.

*(3) **The Auditor-General may accept appointment under the Corporations Act as the auditor of a subsidiary of a State entity.***

*(4) For the purposes of performing an audit of a subsidiary of a State entity, the functions and powers imposed and conferred on the Auditor-General under this Act are **in addition to the functions and powers imposed and conferred under the Corporations Act** or any other written law in relation to the audit.*

the State Auditor General has immunity from prosecution under the Corporations Act and as a consequence, the Australian Securities and Investments Commission will not investigate any matter of compliance that pertains to the adequacy of Audit or oversight of such an entity if it involved oversight or Audit by the State Auditor General (correspondence held).

There is an implicit expectation that the State Owned Company incorporated in this manner as a private company under the Corporations Act(Cth) will be subject, as so too the Audit performed to its satisfaction by the company remunerated Auditor, by oversight of the Australian Securities and Investments Commission.

Such is not the case in apparent practice!

Unfortunately it has been identified by evidence held as a result of extensive inquiry under the Freedom of Information Act that there is a great deal to be desired in terms of compliance to the requirements of s1309, as with other areas of the Act inclusive of requisite financial disclosures, and the sufficiency of Audit performance to the requirements of the Corporations Act(Cth) and Audit Act(Tas).

Bearing that in mind, I refer to the following extract of the Statement of Approach;

> *"… Finally, The Terms of Reference require the Panel to investigate the advice that was provided to Government by Aurora Energy from October 2009 to June 2010. The Panel notes that the Auditor General has recently published his findings on these issues in his Special Report 94: Election promise: five per cent price cap on electricity prices. The Panel will consider the Auditor General's findings before deciding whether further investigation is warranted."*

You will find through reference to the report cited that no consideration was given to the requirements arising as a consequence of s1309 … that obligations arose upon Aurora officers wheresoever they became aware (such as any discussion with Treasury because of the nature of ownership relation which is inconsistent with the nature of the ownership structure) that a Member (the Minister or Treasurer) in regard to any "price cap", may have reliance upon the payment or otherwise of Dividend for the 2009-10 year … at the time they first became aware and subsequently.

For clarity, that is … becoming aware at any time prior to 15th February when the apparent promise was made by Hon. Lin Thorpe MLC, as well as at any time between 15th February 2010 and the date of the subsequent Election on 20th March … albeit some form of "briefing" was purported to have occurred 17th March and it occurred to Treasury and not the Members (Minister and Treasurer).

When did Aurora become aware of the "price cap" proposal that apparently Treasury were aware of in December 2009?

What did Aurora say about the "price cap" proposal and when?

This apparent mid-January 2009 Aurora instigated briefing seems suspect;

> *"… At that stage, the next five year corporate plan had not been completed, and as a result a clear picture of Aurora's forward performance was not available"*
> *(Tasmanian Audit SR:94)*

and yet, Treasury since December had been working in secret on a price cap proposal, without benefit of any forward corporate performance plan?

Concerns are further compounded by advice (acting Legal Services Manager - Aurora) that the Auditor General (and or his representatives) has superior knowledge of the state of the entity as a result of attending the Board Audit and Risk Committee meetings on a monthly basis.

It is not to be just a question of whether the Minister/Treasurer/Government made an erroneous decision in represented good faith … but why it was that the information supposedly held by them gave rise to the erroneous decision … and why, when Aurora officers became aware of it in any manner, the situation was not corrected immediately.

> *" … The Panel will consider the Auditor General's findings before deciding whether further investigation is warranted."*

Because of the obvious limitations inherent in the report of the Auditor General, it is not appropriate in my view to accept it without further examination as a competent explanation of what occurred of the time.

> *"… At the time the election promise was made, though, the Government had sound reason to believe that the five percent price cap could be afforded from payments to Government anticipated to be made by Aurora.*
> *(Tasmanian Audit SR:94)*

And:

> *"… Under the caretaker convention, contact between government departments ad their Ministers is quite restricted because of the need for the bureaucracy to maintain its apolitical stance"*
> *(Tasmanian Audit SR:94)*

So, deciding not to release information to the Members of the company, having clear and material implication for a "promise" upon which the public would be reasonably expected to rely … was "apolitical" was it?

It's is not just whether erroneous decisions were made in represented good faith but why they happened to be erroneous for the time it took to correct them. Whether it was somewhat convenient not to correct them until after the election result had been declared … just in case it had "apolitical" effect upon the party making the promise of a price cap they were unable to fund which would be germane to the considerations of the electorate at the time of election.

Mistakes in good faith will occur, how they are corrected is the demonstration of governance effectiveness. All it takes is a phone call; it's not as if there is any physical distance of significance between Aurora in Kirksway Place and Treasury or the Executive Building.

The issue before us all is not just whether the Members were mislead, but that it would seem also that the public were mislead by contrived control of the true state of affairs of the entity under the oversight of the then current Government.

When did Aurora become aware of the "price cap" proposal that apparently Treasury were aware of in December 2009?

What did Aurora say about the "price cap" proposal and when, between themselves (Executive, Board and Board Audit and Risk Committee) and to Treasury?

Matter 2

Further, referring to the passage;

> *"… The implications of the current structure and governance arrangements, not ownership per se – the Panel will draw out some of the implications of the current governance arrangements for the performance of the electricity sector and policy settings and, where appropriate, identify modifications that may be expected to improve performance and outcomes."*

also with reference to Terms of Reference item 1;

> *"**TERMS OF REFERENCE***
> *The Expert Panel shall investigate and report on:*
>
> *1. The current efficiency and effectiveness of the Tasmanian energy industry with particular reference to the existing regulatory framework and the cost and operation of the energy industry elsewhere in Australia."*

Consideration needs to be given to the manner in which Aurora Energy Pty Ltd, whilst incorporated as a private entity, behave in terms of the preparation of Ministerial correspondences and briefing scripts for the Minister and whether such is appropriate given the nature of business structure; the correct, appropriate and legitimate flow of information … remembering that Aurora represent to seek to operate in an open commercial market with other participants.

A lot is made of Aurora being an "independent" Company and all under the oversight of the Aurora Board … but at the same time;

- Aurora officers prepare return correspondences to constituent complainants for the Minister to sign without apparent inquiry further
- Aurora officers prepare briefing scripts and parliamentary statements for the Minister to be read into the records of the Parliament on their behalf
- Aurora officers prepare responses to Questions On Notice for the Minister to give on their behalf

All of which come under s1309 of the Corporations Act, particularly s1309(2)(f) and s1309(2)(g) … but as records held show, compliance is not achieved.

Matter 3

Further, referring to the passage;

> *" … The implications of the current structure and governance arrangements, not ownership per se – the Panel will draw out some of the implications of the current governance arrangements for the performance of the electricity sector and policy settings and, where appropriate, identify modifications that may be expected to improve performance and outcomes."*

with reference to Terms of Reference item 1;

> *"**TERMS OF REFERENCE***
> *The Expert Panel shall investigate and report on:*
>
> *1. The current efficiency and effectiveness of the Tasmanian energy industry with particular reference to the existing regulatory framework and the cost and operation of the energy industry elsewhere in Australia."*

and with reference to;

> *" … The implications of current regulatory frameworks, not revisiting specific regulatory decisions – the Panel will start from the perspective of the design of the regulatory framework, the incentives that it provides and the behaviours that it drives and consider if there are alternative mechanisms that could lead to more efficient outcomes without jeopardising other objectives such as security of supply or reliability."*

and;

> *" … The outworkings of previous decisions, not recasting history – the Panel will examine the basis on which decisions were made, including the processes that were gone through in reaching those decisions and the objectives and outcomes that were anticipated in making them. The Panel will gather empirical evidence to assess the extent to which these objectives have been achieved and the nature and scope of unanticipated benefits and costs of those decision."*

Past regulatory decisions actually identify what is sufficient, and unfortunately more amply identify the insufficient aspects of it.

For example, you might like to contrast the information provided on the Economic Regulators website currently as to their approach to regulation, and their paper on compliance oversight with what the Electricity Supply Industry Act actually requires the Regulator to do … rather different to what the Regulator wants to do and has done in the past leading to the current investigation endured by Aurora culminating in the referral of the Regulators personnel to the Integrity Commission 9th December 2010.

Past decisions evidence rather well the behaviors they drive. For example, would someone like to explain how Aurora managed to receive external accreditation for their environmental compliance regime, the compliance to the relevant practices and legislation such as (and without limitation to) the Environmental Management and Pollution Control Act … when they weren't actually compliant?

Similarly for example, would someone like to explain how Aurora managed to receive external confirmation in 2007, and earlier, that their internal compliance oversight regimes were effective in relation to the Electricity Supply Industry Act … when they were not!

It's a bit hard to have a competent system of compliance attainment and oversight … and at the same time not actually be compliant year after year! Each of these has a cost implication associated with it reflected in either the tariff or the payments to general revenue.

In terms of the Panels outlook, it's all very well sprinting off into the new future but … putting your trousers and shoes on first … looking to see what history has told us about how to move forward competently prepared and safely is appropriate.

The Economic Regulator for example is all for the "hands off" approach … just a shame the Act requires something completely different and that lead to more than $3m of wasted expenditure and years of work for a great number of individuals from 2004 … but what about the $20m+ expensed, associated with the customer relationship system?

Past regulatory decisions have to be revisited; they tell us why they had to be made. Erroneous decisions can be made in good faith … we need to understand how that occurred so we know what to address into the future.

> *"**TERMS OF REFERENCE***
> *The Expert Panel shall investigate and report on:*
>
> *2. The primary factors that have driven recent increases in non-contestable electricity prices in Tasmania including the impact of major infrastructure development decisions."*

Take the $15m that was included in the 2007 pricing determination (and charged to customers by way of a proportion of the tariff) for the "Customer Relationship System/Billing System".

We are now to apparently have a $60m system which by representation was the system we apparently needed to have all along … but I am not sure then of how the $20m that was just written off as expense during the 2009-10 year happens to fit.

Is it the $15m system that turned into ($20m + $60m=) $80m system we needed to have?

That cost variance calls into clear question the adequacies of the work leading to the pricing determinations. How is the $60m (or $80m) system travelling in the context of the Regulators considerations on the benefits to the Tasmanian community … when the initial agreement as to the appropriateness of the expenditure was based on a $15m cost to be amortised over several years[1].

> *"… In examining price increases, the Panel is keen to identify the causes and to assess the justification for, and efficiency of, those increase as well as the nature of the benefits that electricity users have received in return for higher prices. For example, given the substantial increase in network-related costs over recent years, the Panel will seek to establish the nature and magnitude of the service reliability and other benefits delivered to customers."*

and;

> *"The Panel will examine demand side options and the role that energy efficiency could play in both meeting the demand/supply balance and to assist business and households manage the cost pressures arising from increasing energy prices."*

Just wait until someone starts to openly discuss time of use tariffs and the notion that Time of Use Tariffs can be used to control domestic peak demand (that peak domestic demand is discretionary and not socially determined) and the infrastructure costs associated with its implementation … all to be borne by the domestic consumer. And … Hobart residents are already just up in arms about water meters!

Past decisions, need to be considered carefully, its how we got to where we are … it tells us where not to go again!

The panel is going to be amazed with what the Regulator and Aurora got up to in these last several years in regard to one demised and unlawful undertaking … as was I and anyone who has seen the held documentation. Unfortunately, there is even a distinction it seems also to be drawn between the Executive of Aurora and their own Board given the manner in which the internal Legislative and Regulatory Compliance Attestation papers were falsified before being placed before the Board for consideration in 2007 and 2008.

There are also flow on effects, for example, to the likes of the Tasmanian Audit Office;

> *"Strive/Lead/Excel/To Make A Difference"*

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[1] Then $20m+ was expensed in the 2009-10 year which would appear in addition to $60m to be amortised into future years as a replacement for the $15m the tariff was based on. Unless the tariff is adjusted, this is reflected in the returns to general revenue by way of Tax equivalence or Dividend

> *"To provide independent assurance to the Parliament and Community on the performance and accountability if the Tasmanian Public Sector"*

who are well prepared to look into a $1.6m cost associated with the Tasmanian Brand project (Special Report 83) … but not apparently look into a $3m+ undertaking that was in breach of the law at the time it commenced and for the duration of its undertaking … or the $15m Customer Relationship system we needed to have, at least in 2007, which in 2009-10 incurred a $20m expense write off and we now are apparently to have a $60m Customer Relationship System … as costs ALL being borne by the public one way or another (reflected either in Dividend and Tax Equivalences or in tariff component, or a combination of both).

Is it a case of picking convenient targets?

The oversight of the Electricity Industry actually extends to far more than just the likes of the Office of the Economic Regulator … but to the manner in which oversight is achieved by ALL;

- how the Members (Minister and Treasurer) receive their information and the quality of it
- how the Parliament in general receives its information, and the quality of it, in regard to the undertakings of the Energy sector
- how the other Members of both Houses are able to scrutinize in a worthwhile and effective fashion the quality of the oversight … should Members of each party be Directors?
- the oversight of Corporations Act compliance and Audit Act compliance by both the entities and the Tasmania Audit Office itself

I would be of the view that whilst looking to the future is somewhat convenient … its actually essential to look in great detail to the past and to take onboard those matters which are identifiably to the concern of the public and industry … we didn't get to this point by accident but by a series of events, both related and unrelated.

If you understand clearly the underlying basis, the causal factors for the event, you move from the band aid approach … always look forward, don't look back, let's try this and see what happens … crisis by crisis, intervention to intervention … to actually a more comprehensive and effective solution for the future.

The cost of electricity is derived from the raw materials and delivery infrastructure costs which clearly encompass the ineffectiveness and inefficiencies of the internal and external governance regimes. Scrutiny of relevant examples of "regulatory" and "governance" decisions is pivotal in developing a clear and effective view of the future necessary.

Referring to the passage:

> *"… One of the central purposes of this Review is for the Panel to investigate and report on the efficiency and effectiveness of the sector, and hence, the drivers of electricity prices – to separate the material from immaterial."*

The manner in which the entities are given oversight, the effectiveness of that oversight are true determinants of the future outlook for Electricity Pricing.

> *"… A key issue will be the effectiveness of the current governance frameworks and the implications of decisions made through them on the performance of the businesses, and for the sector more broadly. Another important aspect will be the influence of dividend policy on the financial position and sustainability of the businesses."*

The so called "dividend" policy is also reflected in the Tax Equivalents paid and the Return on Capital factors contained within the pricing determinations, it's not as simple as just looking at the Dividend policy.

Further;

> *"… The primary criteria that the Panel will have regard to in determining the priority of an issue are:*
> - *its materiality in potentially changing incentives, behaviour and decisions that will provide confidence that pricing and investment outcomes are efficient and effective."*

and further;

> *"**TERMS OF REFERENCE***
> *The Expert Panel shall investigate and report on:*
>
> *7. Actions that would guide and inform the development of a Tasmanian Energy Strategy particularly in relation to the Government's primary objectives of minimising the impact on the cost of living in Tasmania and ensuring Tasmania's long term energy sustainability and security."*

The manner and effectiveness of Parliamentary scrutiny of the sector are determinants of the future outlook for Electricity Pricing, infrastructure investment and service delivery. As a result of considerations over the last five years or so … the Business Scrutiny Hearings are clearly ineffective at delivering the necessary results for the people of Tasmania as the records held attest to, certainly in regard to the undertakings of Aurora.

Are there matters that will have a bearing on the proposed timetable that the Panel should be aware of in readjusting the timeframes for the Review?

In respect of Terms of Reference item 8;

> *8. The advice that was provided to the State Government by the senior management or Directors of Aurora Energy from 1 October 2009 to 16 June 2010 inclusive.*

Investigation in regard to these issues will be likely difficult due to the advice of the Chief Executive Officer to the Ombudsman that the entity has been "sanitizing" their records … such as when the Company Secretary retired at the commencement of 2010 for example. The period subject to cover by the terms of reference is the very same period within which the "sanitizations" occurred.

Unfortunately "sanitizations" actually mean non-compliance to the requirements of the Archives Act, in particular s10 and the offence provisions arising under s20.

> *10. Preservation of State records*
> *(1) The relevant authority –*

(a) is to keep proper records in respect of the business of the Government department, State authority or local authority for which the relevant authority is responsible; and

(b) is to cause all such records to be preserved and accessible until they are dealt with in accordance with this Act; and

(c) may, in the name of the Government department, State authority or local authority, take legal proceedings for the recovery of any such records if the relevant authority no longer has legal custody of them.

(2) …
(3) …
(4) …
(5) …

20. Disposal, destruction, &c., of State records

(1) Except as provided by this Part, a person shall not–

(a) destroy or otherwise dispose of a State record; or

(b) transfer, or be a party to arrangements for the transfer of, the custody of a State record; or

(c) transfer, or be a party to arrangements for the transfer of, the ownership of a State record; or

(ca) refuse to provide the State Archivist with the full name and residential address of the person for whom that person is acting as an agent in an arrangement under paragraph (b) or (c) for the transfer of a State record; or

(d) damage or alter a State record.

Penalty: Fine not exceeding 50 penalty units.

(2) …
(3) …
(4) …

(5) For the purpose of applying subsection (1) to a record of a kind used by means of any mechanical or electronic device or equipment, including a computer, any treatment or modification of the record which would prevent there being obtained from the record information or matter that could previously have been obtained from the record shall be deemed to be destruction of the record.

(6) …

The matter was referred to the State Archivist in May of 2010 however to date it is not yet been clarified the extent to which records have been destroyed and whether or not efforts have been expended by Aurora to recover those records that may even able to be recovered.

Any competent consideration given to Terms of Reference Item 8;

8. The advice that was provided to the State Government by the senior management or Directors of Aurora Energy from 1 October 2009 to 16 June 2010 inclusive.

will require examination of the internal correspondences and documentation leading to the provision of advice of the state of affairs of the entity to the Members … such will include e-mails between officers of the entity as well as both hard copy and e-transmittals to Treasury.

Such will also include meeting notes and the like arising as a consequence of meetings between entity officers and other entity officers and those between entity officers and Member associates such as Treasury and other parties of the Government during the period in regard to the position of the entity.

There is certainly no evidence that the Auditor General did such work leading to the report … and indeed given the time period within which the report was prepared … well either the Chief Executive Officer mislead the Ombudsman of there is something that the Auditor General failed to disclose about evidentiary sufficiency.

Such related correspondences seem to have been likely subjected to the destructive processes of sanitization just as those with association to compliance with other legislative and regulatory matters.

It's not just what Treasury/Members were "told" but what they were not told … when a different state of knowledge and awareness of the "cap" became available to the officers of the entity and what they then did.

Recovery of records, represented by Peter Davis 6th September 2010 to be likely to cost in the millions it would seem to return to Archives Act compliance, will likely take not just significant "public" funds but time as well which clearly has potential to impact on the report delivery time frame.

There are current requests still outstanding under the Freedom of Information Act that require lists of correspondences, and those correspondences identifiably of interest from the record meta data, to be delivered up and therefore be obviously available as evidence to the Panel[2].

Such would include identifiable correspondences between parties, within Aurora and between Aurora and external parties such as Treasury and the Members, as well as Directors and Auditors in relation to the price cap.

Is the broad approach outlined in Section 5 (eg. consultation, the holding hearings, release of issues papers) workable and acceptable?

The concern I would express is that I only became aware of the opportunity to make a submission to the Panel …. in regard to, on this occasion, the Statement of Approach, by chance observation on 3rd February as a small notice in the Examiner and it was probably only noticed because it appeared on apparently the wrong day and earlier in the edition than the Public Notices Sections.

With such a significance to the public interest, it would seem that there is something lacking in the manner in which these opportunities have been publicized and yet it is vital for the Panel to fully engage with the public on these matters.

> *"The Panel will continue to use the printed media to alert interested parties to major developments, such as the holding of hearings and the release of major reports."*

Significant effort needs to be expended to ensure that the public are engaged and that they become aware of the opportunity to make submissions … allowing sufficient time for them to make worthwhile submissions … over and above any opportunity to attend a public forum.

[2] Requests being blocked by Aurora and the Ombudsman still to this time

That essentially requires repeated media exposure, more than just newspaper notices, but a clear media presence … talk back radio, news and current affairs coverage and so on.

Time however is also the key. The people who you really need to consider the views and concerns of, the consumer base, have other things to do, they are not paid out of the public purse to make submissions on behalf of their own Agencies during working hours. Keep that in mind with timeframes for submission acceptance.

Depending upon your perspective, luck for some and not for others, Aurora Energy has been under particular scrutiny in terms of its governance and oversight performance in the legislative and regulatory compliance context for the last 5 years. Evidence holdings are extensive, a matter Aurora themselves can attest to.

Perhaps as background you may care to consider the papers tabled by Hon. Kim Booth MHA to the House of Assembly 5th November 2009, reflective of the state of knowledge of the conduct entity in January or so 2009. The matter of the falsified compliance attestations came to knowledge after that date.

I thank the Panel for the opportunity to make submission in regard to the Statement of Approach and should there be further questions please do not hesitate to make contact.

Yours Sincerely,

Greg Todd