

Tenterfield Shire Council

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26. April 2022

OBJECTIONS TO PUBLIC CONSULTATION AND DOCUMENTS / PLANS

Prepared by and with the input of over 300 TSC ratepayers and submitted on behalf of the sender

Referenced Documents

1. Community Strategic Plan & Financial Sustainability Presentation to Community Consultation Sessions April 2022
2. Draft Community Strategic Plan 2022-2032
3. Draft Delivery Program 2022-2025 & Operational Plan 2022-2023
4. Draft Asset Management Strategy 2022-2032
5. Draft Long Term Financial Plan 2022-2032
6. Draft Revenue Policy 2022-2023
7. Draft Workforce Management Strategy 2021-2025

Objection / Rejection is hereby lodged to the following:

1. Public Consultation Process (failed)
2. Contents provided for information (as above and missing documents)
3. Draft Community Strategic Plan (as above)
4. Draft Delivery Program & Operation Plan (as above)
5. Draft Asset Management Strategy (as above)
6. Draft Long Term Financial Plan (as above)
7. Draft Revenue Policy (as above)
8. Draft Workforce Management Strategy (as above)

Executive Summary

Considering the recently published financial position, the Tenterfield Shire Council (Council) has put this community in a **near-catastrophic financial situation**. This situation is not acceptable or explainable other than as **a failure of the councillors to fulfil their duties and the CEO and administration team to act in the community's best interest that pays them to do so**.

On the basis that the councillors are responsible for directing and overseeing the Administration / Operation of the Council, **the five remaining councillors participating in creating this situation** are to be held accountable.

These Councillors and the Chief Executive shall face the consequences of their acts and omissions, apologise to the community and step down with immediate effect.

The Councillors have lost control over the Chief Executive and hence the administration. Some examples:

- **The sudden realisation that the community is in unreconcilable debt.**
- **The uncoordinated proposition of a rate rises from 0.7% to 2.5% to 79% to 109% to 200%.**
- **The public comments by the Chief Executive about people having to move away.**
- **Adding personnel and managers under managers in the organisation chart.**
- **Proposing additional spending without a funding source.**
- **The change from a Farming Community to a tourism community via a Mountain Bike stronghold to an Arts and Crafts Centre – without any consultation.**
- **A budget that shows \$6M in further losses over the coming years.**

Why do we need a \$300k PLUS p.a. CEO to help lose \$6,000,000 over the next 3 years???

The newer councillors shall be reminded of their obligations and held responsible every step of the way. Currently the councillors are **BLAMING** reduced State funding for the situation this council is in, which clearly shows their denial of the fact that there is overspending and lack of governance.

The proposed financial plan is **not acceptable at all**. Significant changes must be made immediately. **Under no circumstances are the councillors to approve** the plans without complete overhaul, input from the public and another round of genuine public consultation.

The community does not understand how this Council can keep spending millions of dollars on office upgrades, salaries, bonuses, vehicles and benefits while driving the deficit further and further. **There is NO value for money proposition and no perception of additional value in return for the increased cost to the ratepayers.**

The different Community Plans talk about "the community vision" – this needs to be corrected. At best, this could be called the **Chief Executive's vision** – as there was no community involvement in developing these plans.

Regarding the recent so-called "community consultation", **no reasonable/honest attempt was made** to engage with the community – the information provided was incomplete. No attempt was made to openly inform the community before the consultation sessions (low attendance) about the proposed 200% Rate Rise and catastrophic financial position/management, ongoing overspending and underfunding, \$50 Million proposed future deficit and impacts on ratepayers.

The community has no to little trust in their Council and withholding the TRUTH does not help.

Despite the Strategic Plans talking about operations being run transparently, efficiently and sustainably, the opposite is true. We see enormous salaries being paid to some public servants – plus a combined effect from past and present councillors lacking qualifications (no relevant business experience) operating today in combination with a council administration that provides selective and non-factual reports. **The CEO and Administration appears to be working against the councillors, driving this Council and community to the brink of bankruptcy with no viable plans how to resolve the situation.**

Multiple honest attempts by competent and concerned local businesspeople/ratepayers and the wider community to obtain active involvement to assist have been ignored or actively rejected. Not using or integrating this available free resource pool goes against every statement of transparency and inclusiveness and good business practices.

As a whole – the plans talk about values, ethics and integrity – while the past and currently experienced actions of the Councillors and Council Administration are the exact opposite.

Difficult questions asked to the Council and councillors remain unanswered which deepens the perception of incompetence, arrogance and ignorance.

They are actively excluding the community as much as possible and propose a financial and asset management strategy that is not viable.

This behaviour and miss management will drive / keep businesses away from Tenterfield Shire and force older / long term residents who have worked and live here for a long time away – without providing an opportunity for younger people to stay or come to the area.

This must end NOW!

Failed Community Consultation in Detail

February and March 2022 Tenterfield Shire Council Documents discuss a higher than usual (0.7%) Special Rate Variation of 2.5%. Following closed discussion, this was decided to be non-effective. No higher rate increase proposal or forum is on council records.

In late February, the Mayor posted on Facebook that a 79.4% Rate rise had been proposed. An extraordinary council meeting was called – lengthy explanations for why this was necessary were in the post (now removed).

After that, only invitations with no further details were posted on Facebook, the council website (well hidden), and the local paper.

The times for the consultations were set in a way that most people could NOT attend them.

Had the Council openly communicated the significance of the proposed plans to the community, a much higher engagement would have been achieved – see the event organised by www.OSOCI.org on April 9, where, based on the approx. 80% rate rise announcement over 250 members of the community was present and expressed their objection to the process and proposed rate rise and financial plans.

After the community was made aware of the proposed impacts and how Council was implementing the financial and other plans, much more interest and input were generated, informing this response.

For those who attended the "community consultation sessions," no presentation was given that actively informed about the significant items.

TSC Community Strategic Plan 2022-2032 & Financial Sustainability was handed out. This document has not been made available prior – it has been added to the website since. So, participants could not have come to the meetings prepared for the consultation with the well-prepared specialists.

Large numbers of Councillors and Council Staff tried to talk participants into submission via a "hard sell" – pretending it was in their best interest. There were 21 council staff/councillors in one session and 4 NON-Council related participants.

A question raised in that session was "shot down" by a Councillor in an aggressive and intimidating tone intended to stop the question from being answered. This kind of bullying behaviour is what the community experiences in this so-called "consultation" process.

Older residents who have come to retire in Tenterfield need a more collaborative approach. However, for this target group (approx. 40% of residents), the proposed rate and charge rise have catastrophic consequences as pensioners have no opportunity to increase income.

Questions were not answered clearly, and in a way, the community members could understand the significance of the potential outcome of the answer. Questions asked to Council after the event are still unanswered to date.

The TSC 2022 Community Strategic Plan – Community Engagement report (no date) was not presented on the TSC website but as a handout only available at the consultation events.

It contains responses from the community as well as statistics.

Upon investigation, it was noticed that input provided by the community via the process had been filtered out / left out.

The question was asked WHO decides which content goes into the report. No answer has been received to date.

It shows that only 33 people had responded to the survey.

Out of those, the following feedback was recorded:

Question 6: How supportive re a rate increase.

- 22** answered: not supportive
- 10 answered: willing to consider a reasonable increase
- 1 answered: supportive

Question 7:

- 11** answered: significant reduction in services – minimal increase in rates
- 9 answered: major reduction in services – small to medium increase in rates

So, with 20 out of 33 OPPOSING a rate rise – the Council still proposes a 200% rate increase.

Conclusion:

The community consultation process is flawed and incomplete. To develop community plans and vision, the process must be undertaken again. Eliminating the shortfalls and executing it properly and inviting and including the community to provide their input and identify themselves with the process and outcome.

Draft Community Strategic Plan

Overview

The plan leaves out some of the most significant aspects of the economy and community such as agriculture, tourism, hospitality and health.

There are many grand statements in the plan that have no foundation, actions, or KPIs / benchmarking. Therefore, they are not measurable, which leads to no actionable/achievable outcomes.

As a whole – the plan sounds nice but falls way short in many sectors and as is would only give an administration an opportunity to “do whatever” they want and justify it by pointing back at the Strategic Plan.

The Strategic Plan shall be completely overhauled with the active involvement of all stakeholders and the community in order to produce an executable plan with clear benefits.

Page 6

Claims are made that Agriculture is the largest employer – no source provided.

This is misleading as most farming businesses are not undertaken as a primary source of income. Most people undertaking farming activities do have a second job. A strong move out of farming is noticeable with people trying to establish other businesses as farming is not viable.

Farming businesses are typically mum and dad businesses with NO employees and potentially only registered to obtain a Primary Producer Tax benefit.

Regardless there is no further mention of agriculture in the plan – WHY?

Page 6

The Health Sector is claimed to be the second-largest employer – no source provided.

The health system and services in and around Tenterfield are well below acceptable standards, including the Aged Care / Nursing Home businesses in town.

Mentioned as a key deliverable/vision point, no specific action or benchmark has been provided:

Page 17 - 5.2.2 Work with key stakeholders and the community to lobby for adequate health services in our region and greater accessibility to regional services.

This is not a suitable and executable strategy (plan) for one of the Key Requirements for this community going forward. And there is no further mention of HEALTH in the plan.

Page 6

Retail is named as the 3rd largest employer.

Since the beginning of COVID, the retail sector has been one of the hardest-hit areas in the shire.

Despite this, there is no further mention of retail in the plan – WHY?

Page 12 - Community

1.1 Tenterfield Shire is a vibrant, inclusive, and safe community where diverse backgrounds and cultures are respected and celebrated

The plan fails to mention the demographics of the shire.

The Plus 60 yo group is with over 40% a significant part of the community, and yet there is NO mention of this group and subsequently NO actions/strategies to cater for this group.

The same can be said for Youth as a target group – mentioned once.

This needs to be redone completely.

Page 13 - Economy

2.1 Develop Tenterfield Shire's economic base into a robust and growing economy that supports creating a variety of employment and business opportunities.

2.1.2 Manage Councils Livestock Saleyards in a commercial manner.

The CEO was asked about the sale of the sales yard and swore that it would not be sold. A \$15,000 valuation of the sales yard was ordered the day after.

This section clearly shows that there is NO understanding of business and the economy. Without a healthy economy, there are no jobs, no income, and no quality of life.

Over the past years a significant number of capital projects were undertaken in the region e.g. Bolivia Bypass, Dam Upgrade, WTP, Bypass PFS and FS totalling about \$200M – upcoming the \$100 Tenterfield bypass. None of those projects led to upskilling in the community, job opportunities, training or the like other than incidental spend. None of those projects had a guaranteed LOCAL SPEND – because such benefits were not written into the Stakeholder requirements. Other Town such as Parkes Shire have achieved about %30 local spend in similar situations. Despite numerous attempts by the community to instigate such local spend initiatives, the Council did not only act but actively rejected.

Business is the LIFE BLOOD of the region and the weakest part of the strategic plan.

There are no goals around attracting new industries to town, participation in ongoing opportunities such as the major projects (Water Treatment Plant, Dam, Bypass...) or ongoing training and development of a Centre of Excellence.

- What about supporting existing businesses.
- How do new residents impact the economy?
- What product development?
- Bypass and impact
- Planning for a Town that no one drives through?
- Affordable Housing
- Development

This needs to be redone completely.

Page 14 – Environment

3.2 Provide secure, sustainable and environmentally sound infrastructure and services that underpin Council's service delivery.

These are NOT environmental strategies – the water services are in place or in progress (Water Treatment Plant) with financial impacts of mismanagement already implemented (water cost increase).

The following points are not what this community needs to focus on concerning their environment.

They seem to have made it into the plan as an excuse for the dramatic overspending on assets in water, waste and wastewater management and the associated cost increases.

How many people are connected to Town Water and Sewerage – do we need more of that, or do we have too much of it already?

3.2.1 Deliver a total water cycle management approach, including water conservation and reuse, is implemented and ENSURE it complies with the Biosecurity Act 2015 and standards.

3.2.2 Deliver an affordable waste management solution for the community to manage waste volumes best and take advantage of recycling opportunities.

3.2.3 Deliver an affordable and effective wastewater management solution for the community.

The environmental section shall be completely overhauled, removing ASSET justification from it.

The services provided shall be Affordable and Appropriate for the population and predicted growth, which they are NOT.

Page 15 – Leadership

“Council continues to partner with and support community members and associations through involvement in decision making and by applying principles of fairness, equity, transparency, and probity in all its dealings.”

This entire section sounds nice and would definitely help if achieved.

The current status is the exact opposite - exclusive, secretive, covering up issues, decision making behind closed doors, unprofessional public conduct of councillors.

Goals must include.

- Competent and accountable – Councillors and Council Leaders
- Affordable
- Not self-focussed
- Councillors to have read and understood the council documents.
- Councillors educate themselves about the subject matters
- Councillors consult with the community before making decisions

Lost time injury rate of <4.24% - is way too high. As an indicator of a healthy workplace (mental and physical), the Council is NOT a healthy workplace where people perform and enjoy participating.

Again – a lot of focus on ASSETS

A Lost Time Incident Rate (days lost to injuries/illness) of about 4 also means 4% waste in wages / operational cost, which should and can be reduced.

Target should be below 2%

Page 16 - Transport

Capital Projects

Measure: Delivered on time, Quality and Budget 100%

How about Public Transport Options?

- Reducing Traffic – share rides
- Bypass and impact
- Planning for a Town that no one drives through?

31-March-Draft-Delivery-Program-2022-2025-Operational-Plan-2022-2023

Page 4 – Community’s Vision

The mayor talks about the communities Vision. What is that – who wrote that – the community clearly was NOT involved.

Page 6 - Duties of Councillors

We should start reminding them they represent ratepayers and should be automatically including our concerns in each meeting when requested. So far, they all fail.

Page 7 - Our Mission / Vision

Explain who researched and devised the strategy - and what data influenced this.

Page 10

Provide an ORG Chart with contact Phone numbers and email addresses

Pages 31 ff

Must be reworked based on the updated Strategic Plan

Draft Workforce Management Strategy

There are many grand statements in the strategy paper that have no foundation, actions, or KPIs / benchmarking. Therefore, they are not measurable, which leads to no actionable/achievable outcomes.

As a whole – the strategy sounds nice but falls way short in many sectors and is not tied in with the current financial situation.

The Strategy shall be completely overhauled once the financial situation has been rectified, funding has been secured and the future of this Council has been defined.

Asset Management Strategy

Executive Summary

The PRIORITY for rural areas = roads.

Do not include footpaths, cycleways, aerodrome, rail tracks, or kerb and guttering in road transport group dollars to avoid diluted dollars on low priorities.

Remove all aspirational projects - these are someone else's job and make the service level unaffordable. Update the content of the staff report on "what everyone wants" to reflect the reality of the outcome of asking ratepayers how much extra rates are they willing to pay?

Remove all activity and financial commitments outside the Council area and primary funding role.

Stop TSC spending rates and financial assistance grants on behalf of other agencies, entities or individuals.

NO to over 200% rates increase (with 110% in 1st 2/3 years) AND

NO to \$50 million deficit over the 10-year long term financial plan

YES to 'service' reductions while councillors get control over TSC spending plans, from now for possibly a year or two.

5,000 TSC ratepayers cannot afford the Chief Executive's recommendations to date.

The Chief Executive says that these documents and recommendations to date DO NOT include any additional expenditure for any reason over the next 10 years, so ratepayers need to identify priorities and \$/activity and administrative units to remove now. It will only continue to escalate.

5,000 ratepayers cannot afford 3 executive positions and 12 manager positions within the "approved" TSC structure. The councillors need to remove delegations for staff replacement, etc., until the \$50 million deficit is resolved and loans covering the deficit are repaid.

5,000 ratepayers can't afford the aspirations contained within the Integrated Planning & Reporting documents now out for public consultation, presumably prepared with input from the 3 executive staff and 12 managers.

Staff have yet to propose how any rate increase will be distributed over all ratepayers. I.e., the Rating Structure. If every ratepayer pays \$1,000 extra, that is \$5 million but only covers 1 year's deficit. Every one of the 5,000 ratepayers would have to pay an extra \$1,000 every year of the 10-year long term financial plan.

Reductions for one rate category mean big increases for others. I.e., higher than even the 200% presented from p39/43 in the 23/3/22 meeting long term financial plan (which should be the document online for public consultation).

ASSET MANAGEMENT STRATEGY suggested \$ changes.

Practical & Achievable Suggestions:

TO URGENTLY REDUCE:

- \$50 million + estimated deficit.
- Repay loans raised to cover the deficit and cash flow problems:
- To significantly reduce the over 200% rate increase (increasing 110% in the first 2/3 years) to NO MORE than 8-10% in 23/24 and State approved rate peg.
- To restore capacity to responsibly consider new expenditures over the 10-year long term financial plan/s (LTFP)
- ***Please Don't forget: the over 200% rate increase or \$50 million + deficit (LTFP) does NOT allow for any more expenditure for the 10-year long term financial plan, including unexpected weather or other events or more cost-shifting etc. See documents, Chief Executive feedback & meeting recordings.

The Chief Executive has been very clear about NO more expenditure and can't keep using the credit card. Hopefully, the Chief Executive does as he indicated and says NO to any expenditure proposals from all sources. (Unless other expenditure is reduced at that meeting to cover the new apparently more important, necessary, urgent item).

***Please consider that instructions to spend capital budgets asap before year-end and additional expenditure being OK if it reduces future operational expenses must stop as an automatic Chief Executive instruction to staff.

While cash flow has no doubt improved (receipt of untied Financial Assistant Grant), there is a long way to go to improve financial management and TSC's financial stability.

*****5,000 odd ratepayers can't afford the aspirational activity & activity belonging to other entities or individuals, especially considering the very large area and the huge areas of non-rate paying national parks and state forests and crown lands.**

*****Priorities outside Tenterfield township seem to clearly be usable Roads, not 'luxuries' currently redirecting scarce TSC resources.**

Submission on public exhibition document: Asset Management Strategy 2022 -2032

A: Asset Management Strategy -

Remove all non-mandatory activity in plans/budgets/10-year LTFP: remove all 'service levels' above a reasonable rate increase IMPACT on ratepayers; Remove all activity which is outside the TSC area, or which is the role of another entity.

AND

B: Asset Management Strategy 2022-2032 -

Inconsistent use of TERMS across pages and tables. Page # issue. The majority of AMP assets are excellent, good, moderate/average CONDITION. How much expenditure for these assets is in a 10-year LTFP? SUGGEST REMOVAL

Section A:

1. Remove all non-mandatory activity in Asset Management and other plans/budgets/10-year LTFP. The approximately 5,000 TSC ratepayers cannot afford to take on financial responsibility for activity and expenditure, which are the responsibility of other entities or agencies.

Staff should not be including asset activity or taking responsibility for new assets because they consider TSC will do a better 'job' or manage 'priorities' better.

For ratepayers, the 'better' solution is to remove them altogether from the Long-Term Financial Plans and proposed excessive rate increases.

2. Remove all 'service levels' that rely on an unreasonable rate increase IMPACT on ratepayers, especially non-mandatory, whether they reduce future operating expenditure or not. In contrast, the current unreasonable rate increase is minimised, and operational deficits and cash flow issues are brought back under responsible financial management.

TSC ratepayers cannot afford to pay for 'gold plated' service standards.

The attached pie charts clearly show that most assets are in the top 3 condition categories for ALL asset groups.

Please provide the TSC approved policy statement for 'intergenerational equity'.

Please provide the TSC approved policy statement for equity across the TSC area and interest groups.

Please provide the TSC approved policy statement for required/minimum service levels, especially for Road Network (excluding footpaths and cycleways and heritage items that are 'luxury' items).

3. Remove all asset capital and operational activity outside TSC local government area or is the primary role of another entity, including all 'aspirational' wants and needs.

Record the removed budgets/activity in a separate 'advocacy' list without any \$ inclusions in the 10 Year LTFP.

TSC ratepayers cannot afford to pay for an activity that belongs to another council, entity, or agency more properly. The NSW government's focus on 'regional' activity does not mean every Council interferes or reallocates scarce resources to regional activity over council area activity.

Please provide a detailed summary of any financial benefit arising from existing regional activity.

4. Including 'Footpaths & Cycleways" within TRANSPORT risks use of scarce \$ which must be allocated to ROAD expenditure as a Shire wide priority.

Suggest 'Footpaths & Cycleways" be moved to Community assets and/or Open Space, Sporting, Reserves, and Recreation grouping.

Do not move the related \$ from roads, culverts, bridges, and causeways.

Footpaths (particularly upgrades, expensive heritage renewals or those outside the main population centres are 'luxury' items that ratepayers cannot afford.)

5. As there is a category for Strategic/Investment assets under CORPORATE, which currently includes the industrial subdivision and commercial property, **it would be appropriate to move the Aerodrome, Livestock Saleyards and CBD assets (including School of Arts and RSL hall etc.?) to Strategic/Investment Assets.**

6. For councillors and ratepayers to understand TSC's success to date in strategic/investment/entrepreneurial assets priority, please provide reports on success to date and planned revenue, expenditure, cash flow in LTFPs

6.1 Please provide a report on the TSC Industrial Estate, showing the total \$ activity to date, including the sale price of every lot, total expenses from reclassification of property, survey, sales activity, property manager expenses etc.

6.2 With the inclusion of identified assets into the strategic/investment category, it should be possible also to integrate at least 2 manager roles, further reducing TSC expenditure commitments.

6.3 Please provide a report on the TSC Industrial Estate, showing the total \$ activity now included in the 10-year long term financial plan, including relevant Manager expenses, so ratepayers and councillors may identify activity to reduce the budget/s.

6.4 Please provide similar reports on the Livestock Saleyards, CBD assets, Land 'assets.'

7 Quarantine all reductions in net expenditure (there may be some estimated revenue associated with activity proposed for removal) and use to reduce the estimated operational deficit and the staff recommended, but unaffordable general rates increase over 200% as per the 10 Year long term financial plan (being 110% in the 1st 3 years).

7.1 Please create a separate group for 'quarantined' expenditure (which may have been previously approved within 20/21 and future year budgets) to a new group that requires a new council resolution before any further expenditure or commitment.

8 Please update policies etc, so that any concept of 'sustainability' doesn't just consider TSC position but also clearly considers the 5,000 odd ratepayers. They are being treated unfairly as the 'balancing item' for the apparent failure of financial risk management to date.

i.e., an estimated \$50 million deficit over the LTFP or an over 200% increase in general rates?!!

Section B:

1.1 Asset Management Strategy 2022-2032 - Inconsistent use of general terms across pages and tables.

While reviewing this public exhibition document, the inconsistent use of many terms across pages and tables **makes it very confusing to the reader.**

Also, there seems to be a problem with page numbering, which does not help ease of use for readers.

Q: Can these issues be updated, please (or was something missed)?

1.2 Asset Management Strategy 2022-2032 - **Inconsistent use of ASSET CONDITION** terms across pages and tables

Asset Condition term #3 uses Average = preventative maintenance work required. P16/115

In the individual AMPs, condition #3 shows as 'moderate'. E.g., Transport p22/115

Q: Is the description for #3 consistent = preventative maintenance work required, despite using different terms? E.g., Average and Moderate terms are used on different pages.

Q: Do the individual AMPs (i.e., not the summaries in this document) use consistent terms as per p16.

Q: **Why do components move between different groupings.** E.g., strategic/investment (industrial subdivision, commercial property), culverts & causeways, parking, aerodrome, other road assets, cemeteries, libraries, public amenities, Open Space, Reserves, recreation, streetscaping, VIC, CBD assets(?), corporate or leadership? works depot/workshop, fuel facilities, equipment (depot?) equipment & furniture? Other assets (land, earthworks, etc.??), communications, community buildings,

Q: **Can you please use consistent terms** across the different categorisations used in this & subordinate documents, including how they align with TSC annual report and financial reports and the 10-year long term financial plan/s?

2. Page numbers don't seem to be consistent throughout the document. Very confusing for a complicated document. Please check page numbers and modify where necessary with a new version.

2.1 The Majority of assets in Asset Management Plan summaries show as "excellent, good, moderate/average" condition.

Q: How much expenditure for these assets (with conditions 1-3) is in the 10-year LTFP?

Suggest removal or defer till 24/25 (at least), allowing time to improve TSC financial risk management, reduce the need to consider the staff recommended rates increase of over 200% (110% in the 1st three years) while doing maintenance as per asset condition #4.

2.2 P16/115 asset condition table/s include "Poor Condition" = renewal/replacement due, increasing reactive maintenance:

2.3 As the Asset Condition 'pie charts' P17-19/115 also show for all-AMPs the condition predominantly conditions 1-3 (all pie charts showing at least 70% with asset conditions 1-3), this supports #3.1 that any expenditure related to the assets reflected in conditions 1-3 should be removed from expenditure budgets for 21/22, 22/23, 23/24 as a start to reducing the unsatisfactory financial position and the inappropriate staff proposals for over 200% rate increases (with 110% in the first 3 years).

/Ends