Ministry of Transport
TE MANATŪ WAKA

BRIEFING

Implications for delivering Let's Get Wellington Moving

Reason for this briefing	You requested advice on the implications for the National Land Transport Fund of delivering Let's Get Wellington Moving (LGWM) under your proposed approach.
Action required	Discuss the contents of this briefing with officials.
Deadline	1 March 2019.
Reason for deadline	To give officials time to draft a Cabinet paper reflecting your preferences for you to take to Cabinet in April 2019.

Contact for telephone discussion (if required)

Name	Position	Telephone	First contact
Bryn Gandy	Deputy Chief Executive, Strategy and Investment	[redacted]	
Marian Willberg	Manager, Demand Management and Revenue	[redacted]	✓
[redacted]	Adviser, Demand Management and Revenue	[redacted]	

Withheld to protect privacy of individuals

MINISTER'S COMMENTS:

Date:	20 February 2019	**Briefing number:**	OC190121
Attention:	Hon Phil Twyford (Minister of Transport) Copy to Hon Julie Anne Genter (Associate Minister of Transport)	**Security level:**	In-confidence

Minister of Transport's office actions

☐ *Noted* ☐ *Seen* ☐ *Approved*

☐ *Needs change* ☐ *Referred to*

☐ *Withdrawn* ☐ *Not seen by Minister* ☐ *Overtaken by events*

Purpose of report

1. Following your meeting with the Let's Get Wellington Moving (LGWM) Governance Group on 31 January, you requested further advice on the financial implications for the National Land Transport Fund (NLTF) of delivering your proposed approach for LGWM.

2. This briefing provides you with advice on the following matters to allow you to have a conversation with us on how to move LGWM forward:

   2.1. The views of the Ministry of Transport (the Ministry), the New Zealand Transport Agency (NZTA), Wellington City Council (WCC) and Greater Wellington Regional Council (GWRC) on the financial assumptions.

   2.2. The NLTF funding gap for your proposed approach for LGWM.

   2.3. The implications associated with addressing the funding gap.

   2.4. Matters to consider when deciding whether to fund LGWM over 30 or 50 years.

   2.5. Implications for local government for funding their share of LGWM.

   2.6. The process for seeking agreement from WCC and GWRC on your proposed approach for LGWM and their acknowledgement of the associated implications for them.

   2.7. Options to progress LGWM, including

   - allocating a greater share of NLTF revenue to the Wellington Region to progress your proposed option
   - freeing up revenue by removing walking and cycling projects from the programme
   - considering an alternative approach to light rail for the corridor between Wellington Train Station and Wellington International Airport via Newtown
   - Next steps for progressing LGWM.

   2.8. The role of the NZTA Board in the delivery of LGWM.

Executive summary

3. On 31 January 2019 you met with the LGWM Governance Group to discuss your proposed approach for LGWM (outlined in Table 1). It agreed to this approach subject to the Ministry, NZTA, WCC and GWRC agreeing on a set of financial assumptions for the LGWM modelling. You noted that your final agreement was also subject to advice from the Ministry on the NLTF implications of funding your proposed approach.

4. The Ministry, NZTA, WCC and GWRC subsequently met to agree a set of financial assumptions.

5. We modelled the affordability of your proposed approach based on the Wellington Region receiving its 'population share' (10 percent) of NLTF revenue over the funding period. The funding gap for central government is $3.34 billion at the end of a 30 year funding period or $5.05 billion at the end of a 50 year funding period.

6. To calculate the funding gaps we used the Ministry's NLTF forecast which assumes no increases in petrol excise duty (PED) and road user charges (RUC) rates other than those already approved by the Government. However, it is reasonable to expect that PED and RUC rates will be increased over the medium term.

7. As you are aware, the NZTA does not allocate NLTF revenue to regions on a population basis. The most likely rationale for investing on a population share basis is that a region is experiencing high growth. The Wellington Region is experiencing faster growth than projected, however, it is not considered to be a high growth region.

8. If costs escalate and/or NLTF revenue is lower than the forecast used to model the funding gap, the funding gap will increase. Cost escalation poses an affordability risk for both central and local government. WCC and GWRC are already significantly constrained within their identified funding sources for their share of LGWM under current cost estimates. There is no agreement on how any additional costs will be shared and there is a risk that WCC and GWRC will approach central government for additional revenue if costs increase.

9. Debt, particularly medium to long term debt, reduces the flexibility of the NLTF for discretionary expenditure. The obligation to repay debt also constrains future policy and reprioritisation decisions. When deciding whether to indicate support for funding LGWM over 30 or 50 years, you and the NZTA Board should consider:

   - interest rates, including uncertainties in the movement of interest rates over the longer-term
   - the willingness of the NZTA Board to take on the debt, given its self-imposed debt covenants[1] and other commitments (eg Auckland light rail)
   - the amount of discretionary NLTF revenue available, accounting for debt servicing costs.

10. WCC and GWRC have indicated that they are committed to funding their share (40 percent) of LGWM. This will require a range of revenue raising tools, which will result in residents of the Wellington Region paying noticeably more than they currently do. WCC and GWRC need to consult publicly before they can use these revenue tools, so there is a risk that public

[1] The NZTA's debt management framework includes a number of 'operating ranges' for financial ratios which the NZTA Board consider to indicate a prudent level of debt for the NLTF. These limits are not absolute but the NZTA Board's decision making regarding the level of debt commitments for the NLTF would include consideration of these prudent operating ranges.

opposition may prevent WCC and GWRC raising the revenue needed to fund their share of LGWM.

11. A number of transport projects have been identified in the Wellington region, in addition to LGWM, that may require funding over the next 20 to 30 years. It is likely that additional projects will come up in the medium-term.

12. We suggest that you seek written confirmation from the Mayor of Wellington and the Chair of GWRC of their acknowledgement of the implications associated with funding the local share of LGWM.

13. In light of the implications outlined above, you may wish to revisit your proposed option for LGWM. At your request, we considered three options.

    13.1. You could deliver light rail by signalling your preference to allocate a greater portion of NLTF revenue to LGWM to the NZTA Board. However, pressures on the NLTF resulting from LGWM and other forward commitments against the NLTF you have signalled could force sharper funding trade-offs than you may intend in other regions and cities. The Government Policy Statement on land transport (GPS) process underway will provide further advice shortly.

    13.2. Removing the walking and cycling projects from the package will only reduce expenditure by $120 million, which is a small fraction of the $3.34 billion funding gap for your proposed approach. We do not recommend removing these projects as they are expected to achieve high benefits and received high support from the public and stakeholders.

    13.3. You may be able to deliver mass transit between Wellington Train Station and Wellington Airport via Newtown at lower cost using options such as newly emerging "trackless tram" technology (acknowledging that this is still in its infancy), or using bus-based mass transit for some, or of all of the corridor.

14. The next steps are for you to:

    14.1. indicate your preferred option for progressing LGWM to officials

    14.2. seek agreement from the LGWM Governance Group on your preferred option

    14.3. take a paper to Cabinet to seek its endorsement of your preferred option.

15. Once you have indicated your preferred option we will prepare a draft Cabinet paper for your consideration.

16. Following Cabinet approval, we will work with you to signal your preferences for LGWM to the NZTA Board.

Background

17. On 31 January 2019 you met with the LGWM Governance Group to discuss your proposed approach for LGWM, which is the projects listed in Table 1 below and an overall 60/40 percent funding split between central and local government.

Table 1 – Your proposed approach for LGWM[2]

Projects	Capex ($m)	Local government share		Central government share	
		$m	%	$m	%
A walkable city	84	41	49	43	51
Connected cycleways	36	18	49	18	51
Public transport (City and North)	360	176	49	184	51
Smarter transport network	36	18	49	18	51
Smarter pricing	36	18	49	18	51
Light rail: Railway Station - Newtown	1,188	297	25	891	75
Light rail: Newtown to Airport	540	270	50	270	50
Unblocking the Basin Reserve	156	78	50	78	50
Second Mount Victoria Tunnel and four laning at Ruahine Street	577	288	50	288	50
Total	**3,013**	**1,204**	**40**	**1,809**	**60**

18. The LGWM Governance Group indicated that it is comfortable with your proposed approach. However, it asked that the Ministry, NZTA, WCC and GWRC agree on a set of financial assumptions for the LGWM modelling.

19. At the time of your meeting we were not able to provide you with complete advice on the NLTF implications of delivering your proposed approach. As such, final agreement on the approach for LGWM is subject to agreement of financial assumptions between the Ministry, NZTA, WCC and GWRC, and your comfort with the associated NLTF implications.

The Ministry, NZTA, WCC and GWRC agree on the financial assumptions underpinning the modelling

20. Officials from the Ministry and NZTA and officers from WCC and GWRC met on 5 February 2019 to go over the financial assumptions used for modelling the affordability of LGWM. The group agreed a set of assumptions for modelling purposes. Further information on the agreed set of assumptions can be provided, if required.

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[2] All figures in this table are uninflated.

Your proposed approach has a funding gap

21. At your direction, we have been modelling the affordability of LGWM on the assumption that the Wellington Region will receive 10 percent (roughly its 'population share') of the NLTF.

22. As indicated to you in previous advice, the Ministry's NLTF forecasts indicate that, based on current cost estimates and other likely regional investments, there will be insufficient revenue to fund the central government portion of LGWM within the 10 percent of NLTF revenue.

23. To calculate the funding gap, we used the Ministry's NLTF forecast. The NLTF is forecast to continue increasing over time. The main reason behind this is vehicle kilometres travelled (VKT) are forecast to continue increasing due to increasing population and a growing vehicle fleet, as observed in recent years.

24. The Ministry's forecast does not include any increases in PED and RUC rates other than those already been approved by the Government. It is reasonable to expect that PED and RUC rates will be increased in the medium to long term. However, we do not assume increases in our forecasts as PED and RUC rates only increase if the government of the day decides to do so.

25. Information recently provided by WCC gives estimates of the NLTF funding gap for your proposed approach, as shown in Table 2 below. Given time constraints, the Ministry currently does not have capacity or capability to carry out an audit of WCC's model.

Table 2 – NLTF funding gap for your proposed approach for LGWM

Number of years over which funding is spread	**Total forecast NLTF revenue Wellington Region 'population share' ($m)**	**Estimated cumulative deficit ($m)**
30	15,356	-3,340
50	24,395	-5,053

26. You have previously indicated that you would be unwilling to support a proposal that would result in the Wellington Region will receiving more than its 'population share' (10 percent) of NLTF revenue. With respect to any future increases in PED and RUC, a rule of thumb is that of every $10 million additional revenue generated, approximately $1 million would be available to contribute to the LGWM funding gap.

Using 'population share' as a basis for allocating NLTF revenue has implications for other regions

27. In our briefing to you in November 2018 – *Advice on Funding Let's Get Wellington Moving* [OC818015] we highlighted concerns around allocating NLTF revenue on a population basis relating to funding principles, affordability and the precedent this could set for other regions.

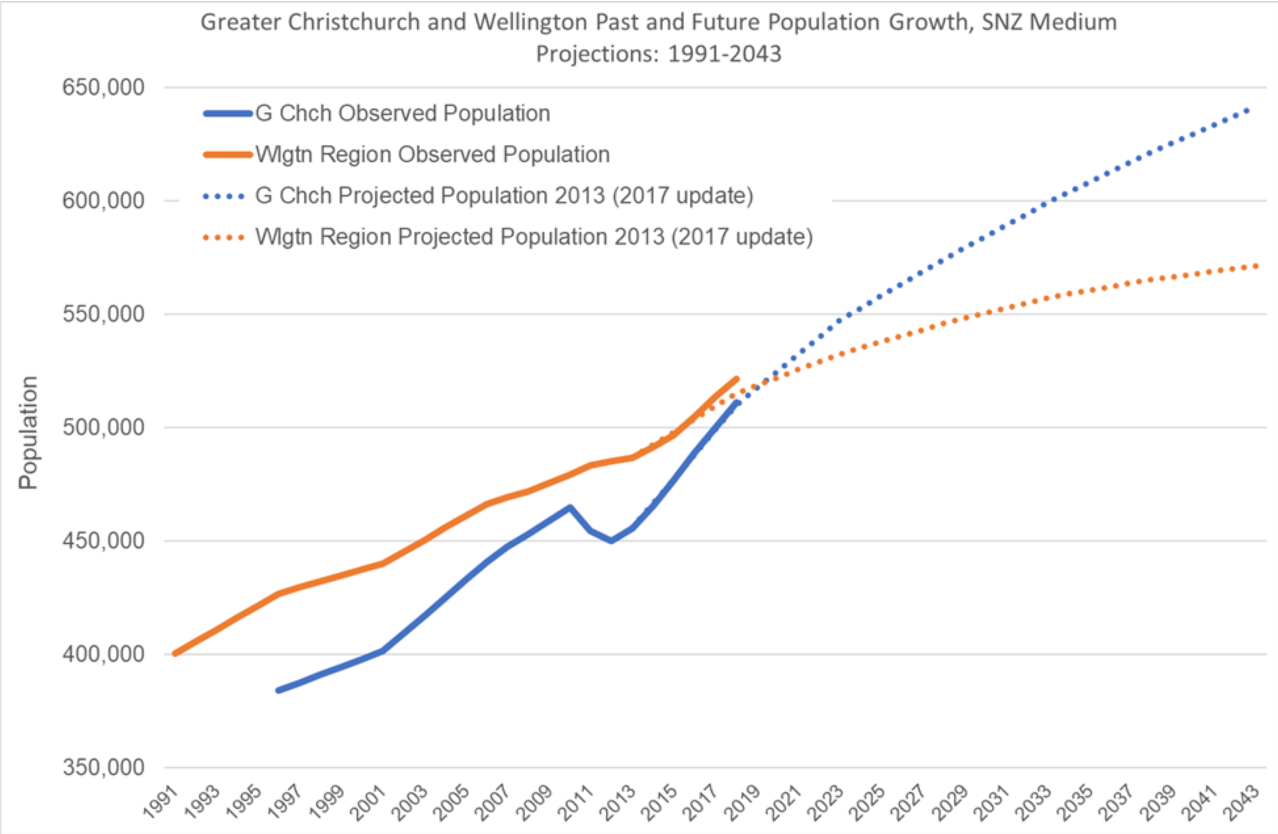
28. You acknowledged our concerns and agreed that 'population share' cannot be used as a basis for allocating NLTF revenue for every region. However, you indicated that you were still comfortable with using 'population share' as a cap for the amount of NLTF revenue the Wellington Region could expect to receive over the medium to long term.

29. Consideration of which regions could receive their 'population share' of NLTF revenue should be made within the national context. According to Statistics New Zealand (Stats NZ) data, the Wellington Region currently has 10.7 percent of New Zealand's population, and is

not considered a high growth region. The Stats NZ medium projection indicates that the Wellington Region's share of national population is expected to drop to 10.1 percent by 2028 and 9.6 percent by 2043.

30. The Wellington Region is experiencing faster than projected population growth. However, Christchurch is roughly the same size as the Wellington Region, but is projected to have almost twice the Wellington Region's population growth as shown in Figure 1 below.

Figure 1 – Greater Christchurch and Wellington Region past and future growth



Cost escalation and lower NLTF revenue are risks

31. Many of the LGWM projects are at a relatively early stage of design and there is a risk that costs will escalate. There is no agreement between central and local government on how any cost escalation would be fundeds WCC and GWRC are already extremely constrained within their identified funding sources for their share of LGWM under current cost estimates. It is likely that WCC and GWRC would approach central government for additional funding if costs escalate.

32. The funding gap outlined above was calculated using the Ministry's Half Yearly Fiscal Update's (HYFU) medium growth scenario for NLTF revenue. The lower growth scenario would have lower NLTF revenue than what is forecasted under the HYFU's medium scenario due to lower population growth, lower vehicle fleet growth and lower economic growth. If this played out, the LGWM funding gap would increase.

There are factors to consider when deciding whether to fund LGWM over 30 or 50 years

33. The decision on the duration of the funding period lies with the NZTA Board, however you can signal your preferred approach to the Board.

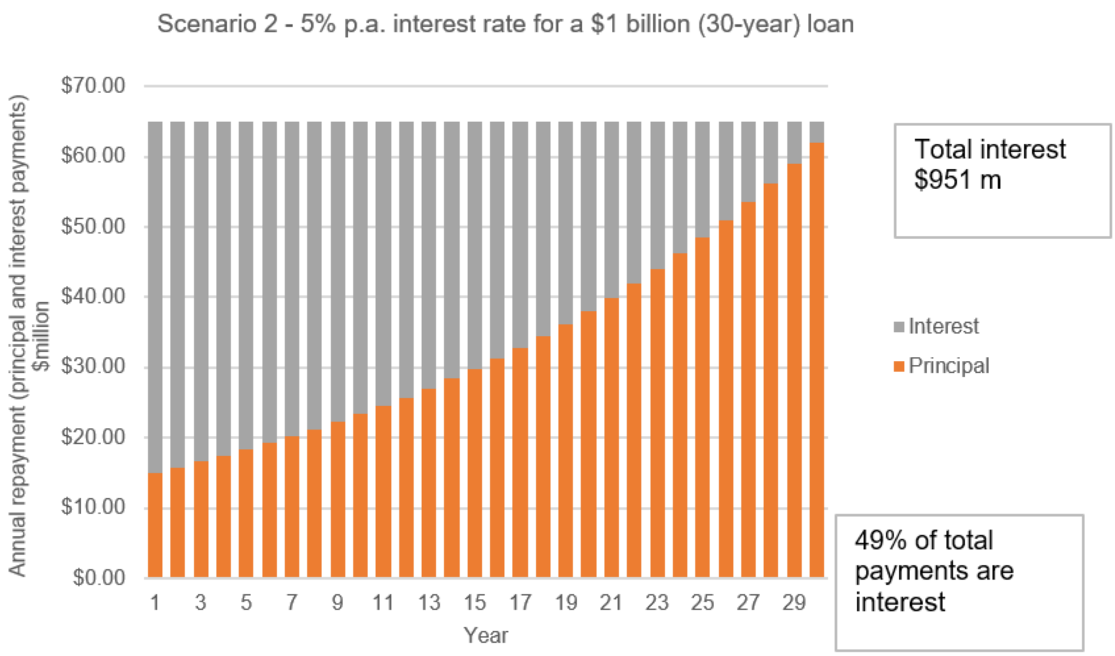
34. Debt servicing costs are funded from future NLTF cash inflows that would otherwise be available to fund other expenditure. Therefore, debt, particularly medium to long term debt, reduces the flexibility of the NLTF for discretionary expenditure. The obligation to repay the debt also constraints future policy and reprioritisation decisions.

35. In addition, committing future revenue to debt repayments also limits the NLTF's ability to respond to future shocks such as natural disasters and reduced economic growth.

36. A shorter loan term will mean higher annual repayments, resulting in less revenue available for discretionary expenditure. Conversely, while a longer loan term will mean lower annual repayments, it will result in higher overall costs due to the additional interest incurred over the longer period (outlined in Figures 2 and 3 below). When deciding whether to indicate support for funding LGWM over 30 or 50 years, you and the NZTA Board should consider:

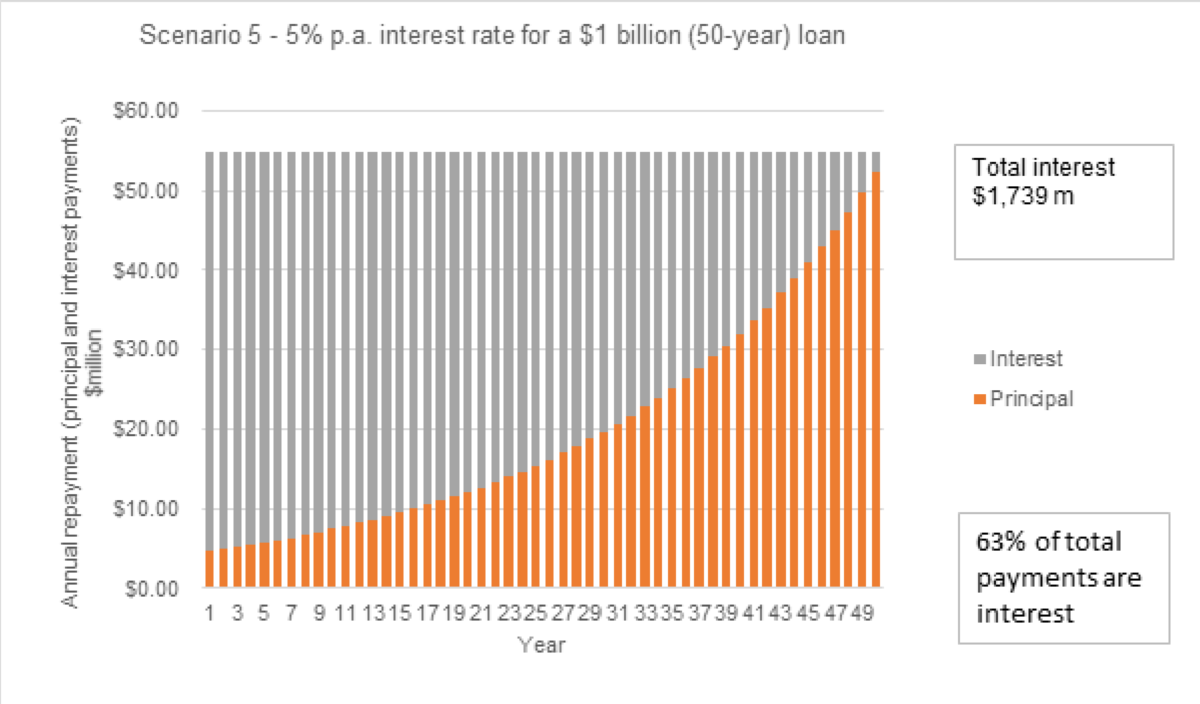
- interest rates, including increased uncertainties in the movement of interest rates over the longer term
- the willingness of the NZTA Board to take on the debt, given its self-imposed debt covenants[3] and other commitments (eg Auckland light rail)
- the amount of discretionary NLTF revenue available, accounting for debt servicing costs.

Figure 2 – 5 percent per annum interest rate for a $1 billion 30 year loan



[3] The NZTA's debt management framework includes a number of 'ranges' which the NZTA Board considers to be a prudent level of debt for the NLTF. These limits are not absolute, but NZTA Board approval is required for debt commitments that exceed any of the ranges.

Figure 2 – 5 percent per annum interest rate for a $1 billion 50 year loan



Withheld to enable future negotiations

Funding the local share of LGWM has significant implications for WCC and GWRC

37. WCC and GWRC have indicated that they are committed to funding their share of LGWM, [redacted]

- [redacted]
- [redacted]
- [redacted]

38. A cordon charge was originally being considered alongside a parking levy. However, we have since been advised by your office that, following conversations with local politicians, a cordon charge is no longer being considered.

39. The LGWM working group has advised that user charges in some form are an important part of the LGWM implementation plan to encourage mode shift. Mode shift is one of the desired medium to long term outcomes of LGWM. Additionally, some form of demand suppression is required in the short term to enable physical works to be carried out in the central city.

40. If user charges were not implemented, an 18 percent rates increase over 12 years would be required for WCC and GWRC to fund their share of LGWM.

41. Local government rates increases must be included in the relevant LTP, which sets out all the things a council wants to do over a ten year period. The LTP is reviewed every three years, and that review process includes public consultation.

42. Given the requirement for public consultation, there is a risk that public opposition could prevent the necessary rates increases to enable WCC and GWRC to fund their share of

LGWM. WCC and GWRC would also need to consult the public if they were to implement a parking levy.

The Wellington Region will need additional investment on top of LGWM over the next 30 years

43. A $100 million per year allowance has been allowed for in modelling the affordability of LGWM against the Wellington Region share of NLTF revenue and expected local revenues. This allowance will need to cover the cost of any additional transport investment in the Wellington Region outside LGWM.

44. The National Land Transport Programme (NLTP) only contains agreed funding for the first three years of the Regional Land Transport Plan (RLTP). The RLTP has a programme covering a six year timeframe. There are a number of RLTP projects currently intended to start within the first decade of LGWM that do not yet have approved funding that may be delayed or deferred to the second or third decade to enable the delivery of LGWM. Table 4 outlines projects in the Wellington Region that may require funding in the second or third decades. These costs are indicative only.

45. *Table 4 – projects in the Wellington Region (not included in LGWM) that may require funding in the second and third decades*

Project	**Cost ($m)**
Petone to Grenada link road	600+
Access to the port and proposed new ferry terminal	150
Lower North Island rail commuter service (Palmerston North and Wairarapa) including new rolling stock	350
State Highway 1 optimisation measures	40
State Highway 2 optimisation measures	100
Hutt cross valley connection	60 – 100
Melling interchange improvements as part of the RiverLink programme	100
Rail projects	1,200
Total	**2,690**

46. [redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted] Withheld to prevent prejudice to a commercial position

47. The costs are based on the total capital requirement over 10 years.

48. There is considerable uncertainty about what projects in the Wellington Region outside of LGWM will require funding over the next 20 to 30 years. As a result, it is difficult to identify further future expenditure beyond the projects listed above. However, it is likely that further expenditure will be required in the second and third decade for resilience improvements and emergency works in response to climate change and natural hazards (eg earthquakes, flooding and slips).

49. GWRC has also advised that further population growth is also likely to result in increased demand for public transport capacity and the need for some new roading capacity in greenfield growth areas (eg the draft Porirua growth strategy envisages two significant growth areas and improved links across to the Hutt Valley).

You should seek acceptance of these implications in writing from WCC and GWRC

50. [redacted] Withheld as free and frank advice

51. To ensure that there is general consensus, we suggest you seek written confirmation from the Mayor of Wellington and the Chair of GWRC of their acknowledgement of the implications associated with funding the local share of LGWM.

You may wish to revisit your proposed approach for LGWM

52. In light of the implications outlined above, you may wish to revisit your proposed option for LGWM. At your request, we considered:

- an option where the Wellington Region receives more than 10 percent of NLTF revenue to fund LGWM – this option would deliver light rail
- an option that removes the walking and cycling projects
- an option that considers an alternative approach to light rail for the corridor between Wellington Train Station and Wellington International Airport via Newtown.

53. Each of these options assumes a 60/40 funding split between central and local government. The options are outlined below.

Option 1 – progress your proposed approach by allocating a greater proportion of NLTF revenue to the Wellington Region

54. For your proposed approach to be fully funded over 30 years, you would need to allocate approximately 12.2 percent of NLTF revenue to the Wellington Region over the funding period. Alternatively, if you wish to fund your proposed approach over 50 years, you would need to allocate approximately 11.7 percent of NLTF revenue over the funding period.

55. The percentages mentioned are an average over the funding period. In some years the Wellington Region will need more NLTF revenue to fund LGWM, particularly in the earlier decades, and in other years it will need less.

56. As previously advised, there is currently no prescriptive mechanism for allocating NLTF revenue regionally. How, and where the NLTF is invested is determined by the NZTA Board using tools and processes to establish the strategic and economic cases for, and the viability of, investments. Projects and programmes are also tested for alignment with strategic priorities in the GPS. Investments are prioritised in the NLTP on the basis of these considerations.

57. This approach can be considered to be priorities-led as the land transport system is statutorily designed to see priorities signalled in the GPS reflected in the mix of projects in the NLTP.

58. If LGWM is a priority for this Government, you could signal to the NZTA Board your priority for investment in LGWM and also set funding levels within the relevant activity classes at an appropriate level to support LGWM being progressed. However, you will need to consider LGWM alongside your other priorities, as the Wellington Region receiving a larger share of NLTF revenue will mean that other regions will receive less.

59. You have signalled a number of forward commitments for the NLTF that are beyond the current NLTP, including the Future of Rail project and the Safety Strategy. You are also currently awaiting advice on the affordability of light rail in Auckland, and associated with this, the affordability of the Auckland Transport Alignment Project. Pressures on the NLTF resulting from these projects, LGWM, and any other projects that may come up could force sharper funding trade-offs than you may intend in other regions and cities.

Option 2 – reduce expenditure by removing walking and cycling projects from the package

60. You indicated that you wish to consider an option where the projects 'a walkable city' and 'connected cycleways' are removed from the LGWM package. Removing these projects will only reduce expenditure by $120 million, which is a small fraction of the $3.34 billion funding gap for your proposed approach.

61. The walkable city and connected cycleway projects are intended to be implemented early on and are viewed as 'quick wins' for LGWM. Both projects were assessed as 'high' against the results alignment of the GPS 2018, and are estimated to have benefit-cost-ratios greater than three. Additionally, feedback from public engagement on LGWM indicates that the prioritisation of walking and cycling is overwhelmingly supported by the public and stakeholders.

62. For the reasons outlined above, we do not recommend removing the walking and cycling projects from the LGWM package.

Option 3 – consider an alternative approach to light rail for the corridor between Wellington Train Station and Wellington International Airport via Newtown

63. The light rail mass transit comprises 57 percent of the costs of your proposed approach. Additionally, the high cost of light rail means that it will need to be financed rather than funded on a pay-go basis. As outlined in Figures 2 and 3, financing a project results in increased costs due to interest repayments.

64. Mass transit forms a key element of the draft LGWM Recommended Programme of Investment (RPI), as it will deliver a step-change in public transport capacity and performance, and provide urban amenity and value uplift benefits along the route, especially at interchanges.

65. The focus of mass transit in the draft RPI has been on the corridor between Wellington Train Station and Wellington Airport via Newtown, which would include:

- a high quality, dedicated mass transit spine separated (where possible) from general traffic
- vehicles with performance characteristics equivalent to light rail transit
- high-quality waiting and interchange facilities with buses and trains

- integration with a new bus network that gives priority to and compliments the mass transit.

66. The draft RPI is intentionally agnostic about mass transit mode. Mass transit technology is evolving rapidly and further in-depth investigation and analysis through a detailed business case needs to be done to appropriately assess mode options and decide which mass transit mode best achieves the objectives.

67. Light rail is a particularly expensive mass transit option as it involves some expensive elements when introduced to city streets, including the relocation of underground utility services. The Newtown-Airport section also involves a relatively expensive tunnel section under Mt Albert.

68. Alternatives to light rail have been examined at various stages during the development of the draft RPI. It could be possible to deliver mass transit between Wellington Train Station and Wellington Airport via Newtown at lower cost using options such as newly emerging "trackless tram" technology (acknowledging that this is still in its infancy), or using bus-based mass transit for some, or of all of the corridor. This is because these options would not require the relocation of utility services.

69. Another option that has been explored is using buses to service the eastern suburbs and the airport via dedicated bus or high occupancy vehicle lanes in a new Mt Victoria tunnel. This would remove the need for light rail between Newtown and the Airport, reducing overall costs.

70. The LGWM analysis shows that this option would provide similar transport benefits to light rail, but without the same value uplift potential (although the greatest land value uplift potential is in the Newtown section). For this reason, the LGWM Governance Group favoured a single mass transit route to the airport via Newtown. However, if lower cost alternatives are required, this option could be revisited.

Next steps

71. The next steps are for you to:

    71.1. indicate your preferred option for progressing LGWM to officials

    71.2. seek agreement from the LGWM Governance Group on your preferred option

    71.3. take a paper to Cabinet to seek its endorsement of your preferred option.

72. You have indicated that you wish to take a paper to Cabinet at the end of March. Given additional work has been required to provide you with this advice, and you will likely need to seek agreement from the LGWM Governance Group, we are unlikely to be able to provide you with a draft Cabinet paper in the desired timeframe. We envisage that you will be able to take a paper to Cabinet in early- to mid-April dependent on your conversations with the LGWM Governance Group.

73. Should you wish to consider a different approach to light rail, we suggest you could still make a public announcement based on a mass rapid transit solution along the corridor between Wellington Train Station and Wellington International Airport via Newtown. You could note that work is still being done to consider the most effective form of mass rapid transit to deliver the desired outcomes.

You can signal LGWM as a priority to the NZTA Board

74. It is important to note that section 95 of the Act guarantees the statutorily independent functions of the NZTA. This means that the NZTA Board has final decision making rights on matters such as the inclusion of projects in the NLTP, the amount of NLTF funding they receive, FAR and debt duration. The LGWM projects will come through the Board for inclusion in the NLTP in the standard way:

- they will need to be included in GWRC's Regional Land Transport Plan
- they will be assessed according to the Investment Assessment Framework and prioritised against other projects nationwide
- they will be subject to the necessary funding being available in the relevant activity class.

75. If you wish for the projects included in your proposed approach for LGWM to progress and/or be funded under alternative arrangements to the status quo, you will need to indicate that preference to the NZTA Board. There are a number of ways you could do this, including:

- referencing LGWM as a priority in the GPS – similar to the approach used for the Auckland Transport Alignment Project (ATAP)
- making appropriate allowance for funding by activity class within the GPS, and overall through PED and RUC increases
- indicating criteria for funding assistance rates for certain LGWM projects
- indicating your expectations of the Wellington Region receiving its 'population share' of NLTF revenue.

76. You can provide the above guidance through references in the GPS and/or Ministerial letters to the NZTA Board.

Recommendation

77. The recommendation is that you:

(a) **discuss** the contents of this briefing with officials. Yes/No

Marian Willberg
Manager, Demand Management and Revenue

MINISTER'S SIGNATURE:

DATE: