

4/02/2026

Rowan Burns
Policy Manager
Department of Internal Affairs
45 Pipitea Street
Wellington

Emailed to: ratescapping@dia.govt.nz

Submission from the Manawatū District Council on a rates target model for New Zealand

Dear Mr Burns

The Manawatū District Council (MDC) thanks the Department of Internal Affairs for the opportunity to provide feedback on the Government's proposed introduction of a rates target model for New Zealand.

General feedback

MDC does not oppose the principle of setting a target range for rates increases in New Zealand. However, MDC does not consider rates banding, on its own, to be an effective or sustainable response to the underlying funding challenges facing local government. There are a number of important considerations that should inform the final model to ensure the approach is appropriately targeted, practical to implement, and avoids unintended consequences.

MDC has fundamental concerns regarding the proposal that rates banding be expressed on a per capita basis, rather than per rating unit (for example, by separately used or inhabited part of a rating unit (SUIP)). Expressing rates increases in this way risks confusing the public, as rates are levied on a property basis rather than population. In addition, population-based measures are a poor proxy for rates affordability, as there is not a linear relationship between population growth and demand for council infrastructure, services, and regulatory functions.

MDC also shares the concerns raised by Taituarā – Local Government Professionals Aotearoa that capping rates within a target band may place the effective implementation of resource management reforms, emergency management reforms, and Simplifying Local Government reforms at risk.

As outlined in Manawatū District Council's *Open Letter on Rates Capping* to the Hon Simon Watts (August 2025), rates banding does not address the underlying issue that reliance on rates as the primary source of local government funding is unsustainable. Council continues to advocate for a revised funding model that provides local

authorities with a greater share of tax revenue and access to additional funding tools, thereby reducing reliance on rates. Council also reiterates its request for the removal of GST from rates, noting that this change alone would result in an effective 15 per cent reduction in rates. MDC considers that applying GST to rates amounts to a tax on a tax. As an alternative, Council suggests that consideration be given to allowing local authorities to retain GST collected on rates as a means of strengthening the sustainability of local government funding.

Feedback on the submission prepared by Taituarā – Local Government Professionals Aotearoa

MDC generally supports the submission prepared by Taituarā – Local Government Professionals Aotearoa. In particular, we support the following key submission points and recommendations:

- We concur with the general policy statement that preceded the Local Government (System Improvements) Bill that *“Rates rises are being primarily driven by rising council costs, particularly for critical infrastructure.”* As noted in our open letter to Hon Simon Watts, Minister for Local Government (dated 26 August 2025), the primary contributors to Council’s rates increase of 7.56% for 2025/26 was inflation for three waters, interest, the cost of gas, and cost of electricity. Only 1.08% of the total rates increase was attributable to new projects and initiatives.
- The model needs to be transparent – simple for councils and their communities to understand. This submission expands on the concerns that MDC has with the proposed rates target formula.
- The reliance on the CPI as a measure of price change underestimates the actual movement in infrastructure costs. Taituarā recommends CPI be replaced by the Capital Goods Price Index (CGPI) given it is more reflective of construction inflation pressures.
- The proposed rates target formula is not sufficiently localised. For example, the growth component should be applicable to all councils experiencing growth, not just an unspecified few councils.
- The proposed rates formula does not account for government mandated changes in levels of service or new responsibilities imposed on local government. Local government will become increasingly unwilling to accede to new central government mandates without full cost recovery mechanisms that sit outside of the rating system. For example, in the 2025/26 financial year, 0.34% of the rates increase was attributable to the new central government water levies.
- Stringent limits on rates could constrain local government’s ability to invest in infrastructure in a way that supports Central Government’s objectives in housing, urban development, and economic growth and development.
- The proposal creates a potential for shifting the cost burden for tourism, arts, heritage, culture and events from local government to central government. The regulator should have some ability to adjust the cap to account for exogenous events and variables that impact on local authority costs.
- Rates capping/banding could encourage councils to alter current funding arrangements for activities to shift income from rates, to fees and charges.

Our open letter on rates capping to Minister Watts (attached) provides some examples of the true cost to the community if council were to fund 100% of an activity via user fees and charges. We agree with Taituarā’s assertion that moving to user pays could lead to possible reductions in levels of service, and lead to unintended consequences such as negative impacts on health, social wellbeing and crime.

- A rates cap/band could undermine prudent financial management by incentivising short-term behaviours such as reducing spending on maintenance and renewals, and may discourage councils from investing in resilience measures during construction (i.e., may encourage councils to make decisions based on short-term costs at the expense of considering long-term sustainability and whole-of-life costs).
- More detail is needed on the process for applying to the regulator for exceptions.
- The regulator needs to be obligated to respond to applications for exceptions within a timely timeframe (a matter of weeks rather than months), to avoid uncertainty and disruption to councils’ Annual Plan and Long-term Plan work programmes.
- As the Commerce Commission is also the water services regulator, if appointed as the regulator for rates, there is potential for public confusion given the different regulation regimes that apply.
- Any metrics that local authorities need to consider will need to be in place well before local authorities finalise their financial strategies and revenue and financing policies for the 2027 Long-term Plan (i.e. no later than June 2026).
- That any levy or charge set by a third party and collected via the rating system be excluded from the model.

MDC agrees with the submission by Taituarā that the model and supporting information is not transparent about how population growth will be accounted for. MDC is concerned that Stats NZ traditionally underestimates population growth in the Manawatū District. Table 1 is a comparative table between the 2018 medium based projections from StatsNZ and our actual population estimates (StatsNZ) for those corresponding years:

TABLE 1

Year at 30 June	2019	2020	2021	2022	2023	2024
Stats NZ medium	31,440	31,780	32,120	32,460	32,800	32,960
Actual	31,500	32,100	32,600	32,800	33,200	33,600
Difference	60	320	480	340	400	640

Due to concerns regarding the accuracy of StatsNZ forecasts, MDC commissions Infometrics to prepare population and household forecasts to inform our Long-term Plan. MDC also notes that the changes to the census may further complicate the timing

and accuracy of any population projections commissioned by StatsNZ, particularly for Districts like the Manawātū that have a high proportion of their population living rurally.

MDC supports recommendation 5 in the submission by Taituarā that a population growth component be added for all local authorities that can demonstrate that they are forecast to experience population growth. MDC generally supports recommendation 6 in the Taituarā submission that local authorities be permitted to nominate either the Statistics New Zealand forecasts of population for their area, or forecasts from a provider whose methodology has been certified as being robust. Where MDC's view differs slightly from that of Taituarā is that we consider the audit of local authorities' population and household forecasts as part of a Long-term Plan to provide this assurance. We would not support population estimates having to be certified by the regulator in consultation with the Government Statistician, if such an approach would add to the cost of administering the model.

MDC recommends that the growth component for all Councils experiencing growth be based on population and household projections that have been audited as part of councils' Long-term Plans. MDC considers that household rather than population projections may more closely align with a rating target that applies on a per-rating unit (price) basis. The Committee should therefore consider whether the formula should be amended to refer to household growth or increase in number of rating units, as opposed to "population growth" and the "average residential population."

MDC agrees with the concerns raised in the submission by Taituarā that any new responsibilities/mandates imposed on local government by central government should come with commensurate funding, or that the regulator should be able to adjust the "cap" where an exogenous event has had a systemic impact on local authority costs. However, our support for recommendation 2 in Taituarā's submission that the DIA or regulator prepare an annual report to "*identify any new responsibilities imposed on local government, and any steps taken to mitigate additional cost imposed by those new responsibilities*" is contingent on ensuring that such a requirement is not funded through increased levies on local government.

MDC also generally supports recommendation 3 in the Taituarā submission that asks for central government to replace all existing limits on local government's ability to set fees and charges for statutory functions with a power to charge actual and reasonable costs (extending this power to also include staff time and overheads). However, any changes to fees and charges facilitated by the removal of limits would need to be carefully managed to avoid unintended consequences.

Consultation questions

1. *Do you agree with the proposed economic indicators to be included in a formula for setting a rates target?*

MDC does not support the proposed use of CPI as the primary indicator of price change within the formula. CPI is a household cost-of-living measure and does not reflect the main drivers of council cost escalation, particularly where costs are driven by labour, construction inputs, and contractor markets. MDC supports the use of independently produced economic indicators but considers the proposed indicator

set should be refined so that the price-change measure better aligns with local government cost pressures.

2. *If not, what economic indicators do you suggest be included and why?*

MDC supports the use of Stats NZ capital and construction-related indices (such as CGPI, and relevant construction measures within the Producer Price Index framework), as these are more closely aligned with infrastructure and service delivery cost escalation than CPI and are transparent and independently produced. MDC also notes that local-government-specific cost adjustors (such as those prepared by BERL for LTP forecasting) are often more cost-reflective than CPI. However, we recognise that as the Local Government Cost Index is commissioned by Taituarā and paid for by the sector, use of this in the formula may be perceived as not meeting the government's requirements for independence. If the LGCI is to be used in a national formula it must be independently governed, transparent, and not sector-controlled - potentially through direct central government commissioning or a Stats NZ-led approach.

a. *Does setting the minimum of the target in line with inflation ensure that councils can maintain service standards? If not, why not?*

No. Setting the minimum target in line with inflation alone does not ensure councils can maintain service standards, because councils face real cost and demand growth that is not captured by inflation measures. Key drivers include population growth and demographic change, regulatory and compliance requirements, the need to address asset condition and renewals, and climate resilience and risk obligations. If the minimum target is constrained to inflation only, it risks creating an expectation that councils can absorb these pressures without impacting service levels or asset performance. The outcomes of which could be deferred maintenance, reduced service standards, or increased operational and compliance risk over time. The minimum target should therefore recognise that maintaining service standards often requires funding growth beyond inflation.

3. *Does the maximum of the target account for council spending on core services?*

MDC is not confident that the proposed maximum of the target range (anchored to long-run nominal GDP growth) will reliably account for council spending on core services. Core services such as network infrastructure, waste management and minimisation, civil defence emergency management, and community and recreational facilities are increasingly subject to cost escalation and regulatory requirements, and resilience expectations that are not well captured by a single GDP-based measure. MDC notes that the proposal assumes the system is in a "steady state" where infrastructure deficits have been addressed and investment is constant as a share of GDP. However, many councils are not in that position and are managing significant renewal and resilience needs, and funding catch-up investment to avoid further deterioration of assets.

MDC also notes the analysis referenced in Local Government New Zealand's submission which questions the appropriateness of anchoring the upper bound of the target range to long-run nominal total GDP growth. LGNZ highlights that general government expenditure growth has historically exceeded total GDP growth, and argues that this more closely reflects the cost environment faced by councils.

This analysis reinforces MDC's concern that a GDP-anchored maximum may not adequately capture the cost pressures associated with delivering and maintaining core local government services, particularly where those costs are driven by labour, construction markets, regulatory standards, and infrastructure renewal requirements rather than general economic output.

In addition, Manawatū District Council notes the concerns raised in Local Government New Zealand's submission regarding the potential implications of a binding rates cap or band for councils' credit ratings and borrowing costs. LGNZ has highlighted that constraining councils' primary revenue source may negatively affect lender and rating agency assessments of council financial flexibility, increasing borrowing costs and reducing councils' ability to fund long-term infrastructure investment.

MDC considers this risk particularly relevant in the context of central government expectations that local authorities will take on greater levels of debt to address infrastructure deficits. Even small increases in borrowing costs can materially affect councils with significant debt portfolios, potentially reducing their capacity to fund long-term infrastructure investment. This interaction should be explicitly considered in the final design of the rates target model.

MDC also notes that the design intent of the model appears to focus on constraining expenditure outside a government-defined set of core services, when the evidence indicates that the cost of delivering core services is the primary driver of rates increases.

While the proposal states that councils retain discretion over how rates funding is allocated, a maximum target that is too tightly anchored will constrain the overall rates-funded envelope over time. MDC is concerned that in applying the cap to price and not volume, growth in the rating base is not reflected in the cap. In MDC's opinion, this approach does not reflect the reality that not all rates increases translate into increased burden on existing ratepayers. For example, in 2025/26 the total rates increase was 7.56%, but 1.57% was absorbed by growth in rating units, reducing the impact on existing ratepayers to 5.99%. This illustrates that council "headline" rates changes already reflect structural factors such as growth, alongside genuine cost pressures in core services. A maximum band that does not adequately reflect these drivers risks limiting councils' ability to maintain core service standards and meet statutory obligations.

4. What council spending will not be able to take place under this target range? Why?

While the proposal is described as a target band rather than a formal cap, Manawatū District Council notes the observation made in Local Government New Zealand’s submission that, where the upper bound becomes binding, the practical effects for councils may be indistinguishable from a rates cap. In such circumstances, councils’ ability to respond flexibly to cost shocks, investment needs, or community priorities may be materially constrained.

MDC’s comments below therefore focus on the likely behavioural and investment impacts that may arise if the upper bound operates as a binding constraint in practice.

Because the proposal is a target band rather than a service-by-service restriction, the most likely impacts are not that certain activities are formally prohibited. Instead, if the band becomes binding, councils will need to reprioritise within a constrained rates-funded envelope. In practice, the spending most at risk of being reduced, delayed, or deferred is the spending that is easiest to adjust in the short term, even where that is not optimal for communities or long-term affordability. Short-term underinvestment and deferred maintenance could lead to much higher catch-up costs over the long-term.

MDC considers the areas most likely to be affected include:

- Preventive maintenance, renewals and resilience investment, where deferral is often the quickest way to remain within a constrained funding envelope. Over time, this increases the risk of compounding asset deterioration, higher future costs, and service failures.
- Cuts to discretionary funding that is often characterised as “non-core”, but which responds to increasing local need. MDC has previously noted that, despite this spending being a small proportion of the Council’s budget, reductions would have disproportionately negative impacts on communities and shift costs elsewhere in the system.
- Regulatory service delivery, particularly where councils have limited ability to recover full costs through fees and charges due to cost recovery constraints, consultation requirements, or statutory settings. In these circumstances, a constrained rates-funded envelope may result in reduced service levels, longer processing timeframes, or reduced capacity rather than improved efficiency.
- Depreciation funding and asset reinvestment, particularly where councils are already underfunding depreciation for some assets. MDC has previously noted that it currently funds only 50% of depreciation for some significant assets (including the Makino Aquatic Centre and Manawatū Community Hub Libraries). If the upper bound of the target band becomes binding, councils may be further incentivised to underfund depreciation or defer reinvestment in order to remain within the band, directly affecting service standards and long-term affordability. In this context, MDC notes the concern raised in Local Government New Zealand’s submission that constrained revenue settings may create systemic

incentives for such behaviour across the sector, undermining long-term asset condition, affordability, and intergenerational equity.

- Insurance and financing pressures, which are largely outside council control and can remain elevated despite changes in headline interest rates due to fixed-rate borrowing and hedging arrangements. The existing debt position of councils needs to be a factor that is considered.

MDC also expects that a binding target band would increase incentives to shift funding from rates to fees and charges, which can reduce access to services and shift costs onto individual service users. MDC has previously highlighted that if the Makino Aquatic Centre were required to move to full cost recovery through user charges, adult general admission would need to increase from \$5.50 to \$28.16 (an increase of 412%). Similarly, MDC has noted that full cost recovery for cemetery services would require fee increases of more than 150%, which would have significant impacts in rural communities with low service volumes. These examples demonstrate that shifts from rates to user charges can create substantial equity and access issues, even where councils are attempting to remain within a constrained rates-funded envelope.

When comparing this proposal with Australian rates capping models, it is worth noting that Australian councils receive funding from federal government as a matter of course, and additional funding for significant projects. Other than FAR rates for roading projects, New Zealand councils receive little in the way of central government funding.

Rates capping has the potential to constrain councils' primary revenue source for funding infrastructure, particularly in high-growth areas where upfront investment is required to enable development. In this context, the proposed rates banding framework risks limiting local government's ability to address New Zealand's well-documented infrastructure deficit and may not be well aligned with the Government's stated objective of accelerating infrastructure delivery and development to support economic growth.

5. *Are changes to the target needed to account for variations between regions and councils? What changes do you propose and why?*

Yes. MDC supports changes to ensure the model is appropriately localised, recognising that councils face materially different combinations of growth pressures, infrastructure condition and renewal requirements, geographic scale, climate risk exposure, and regulatory obligations. A single national band with limited differentiation risks placing disproportionate pressure on councils with high renewal needs or significant growth, and may constrain councils' ability to maintain service standards and meet legislative requirements.

MDC is responsible for a geographically extensive roading network, comprising approximately 1,369 km of roads and around 380 bridges and culverts, which

requires substantial ongoing maintenance and renewal to sustain agreed levels of service. Approximately 53 per cent of the District's population resides in Feilding, with the balance living rurally or in rural villages. Rural-provincial councils such as Manawatū District Council must therefore provide and maintain core services, including water and roading, across a wide geographic area with fewer ratepayers to share the cost base, creating inherent affordability pressures that are less pronounced in more urbanised councils.

By way of example, in the 2023–24 financial year, rural roads accounted for 89 per cent of the Council's total roading infrastructure costs. In this context, rates banding is likely to have a disproportionate impact on rural-provincial councils, where extensive asset networks, dispersed settlement patterns, and a smaller rating base result in a greater reliance on general rates to fund essential infrastructure maintenance and renewal.

The requirements of the National Policy Statement on Urban Development (NPS-UD) further illustrate potential policy misalignment. Under the NPS-UD, councils are required to maintain a competitiveness margin by ensuring a surplus of development-ready land—typically 15–20 per cent above projected demand—to enable timely development and support growth outcomes. However, the development contributions framework enables councils to recover only the actual, attributable costs of growth-related infrastructure and does not provide for full cost recovery where infrastructure capacity must be provided in advance of demand to meet competitiveness requirements.

In practice, the funding gap between infrastructure that can be recovered through development contributions and infrastructure required to meet NPS-UD obligations is met through general rates. Constraining councils' ability to raise rates through rates banding therefore risks undermining their capacity to meet statutory obligations under the NPS-UD and may be inconsistent with the Government's stated objective of accelerating development and enabling growth.

MDC also supports the position outlined in Local Government New Zealand's submission that greater transparency is required regarding the cumulative cost impacts of central government policy and legislative changes on local authorities. LGNZ has suggested that the regulator play a role in monitoring and reporting on cost shifting from central government to councils.

MDC considers that improved visibility of these impacts would support a more transparent and evidence-based application of the rates target model, provided that any such monitoring function is not funded through additional levies on local government.

MDC proposes the following changes:

1. Confirm the target applies on a per-rating unit (price) basis rather than acting as a total rates revenue cap. This will ensure the model reflects the rates burden experienced by households and businesses and does not penalise growth councils where part of the overall rates increase reflects changes in the number of rating units (as demonstrated by MDC's 2025/26 rates increase, where a portion was absorbed by growth).
2. Introduce transparent adjustment mechanisms that recognise local drivers of expenditure and investment need, including:
 - growth and development pressures (including the portion of growth costs not recovered through development contributions/levies);
 - infrastructure renewal deficits and asset condition;
 - resilience investment needs and emergency recovery requirements; and
 - regulatory and compliance-driven cost pressures beyond council control.
3. Provide a clear and workable variation process, including a lighter-touch and time-bound pathway for emergency recovery and disaster events, and clear decision timeframes to avoid delaying essential works or creating perverse incentives to defer investment.

Clarification required: scope of the waters exclusion

MDC notes there is ambiguity in the proposal's stated exclusion for "water charges and water-related targeted rates." MDC's Revenue and Financing Policy includes a mixed funding approach for waters-related activities, with components funded through both targeted rates and general rates. For example, MDC currently funds urban stormwater through a combination of targeted rates (80%) and General Rates (20%). If the exclusion applies only to explicit water charges and water-related targeted rates (and not to waters costs funded through General Rates), councils such as MDC could be unintentionally constrained in their ability to fund essential waters services and renewals. This would create inequity between councils based on rating structure rather than service need and could incentivise councils to restructure rating policies for compliance rather than sound long-term funding decisions. MDC therefore recommends that the scope of the waters exclusion be clarified and applied consistently to waters-related funding regardless of the rating mechanism used, to avoid unintended impacts on infrastructure investment and service standards.

MDC notes that the treatment of three waters will materially affect councils that are retaining in-house delivery arrangements during the transition. While the proposal indicates that "water charges and water-related targeted rates" are excluded, the practical impact on councils will depend on how this exclusion is defined and implemented, including whether waters-related expenditure currently funded through General Rates is also excluded. If waters investment, compliance, or financing pressures remain within the rates-funded envelope in practice during transition, this will affect councils' ability to manage debt servicing, renewals investment, and affordability while maintaining service standards.

Recommendations

That the Committee:

A. Endorse and address the following key issues identified in the submission by Taituarā – Local Government Professionals Aotearoa:

1. That the Committee make amendments to the proposed formula in the rates target model to make it more transparent and readily understood by councils and their communities. Added to this, there needs to be a clear and workable exception/variation process and timely decision-making by the regulator.
2. That the Committee recommend that the proposed formula is amended to remove CPI as the price change measure, noting that CPI is not reflective of the cost drivers faced by local government and that a more appropriate indicator is required.
3. That the Committee recommend changes to the rates target model to ensure it is sufficiently localised, including that growth pressures are appropriately recognised and are applicable to all councils experiencing growth rather than an unspecified subset.
4. That the Committee recommend changes to the rates target model to ensure it accounts for government-mandated changes, including new statutory responsibilities and mandated changes in levels of service, with appropriate cost recovery mechanisms that sit outside the rates target model.
5. That the Committee recognises and recommends amendments to the proposal to address the concerns raised in the Taituarā submission with respect to the unintended consequences that may result from shifting revenue from rates to fees and charges, including impacts on levels of service, reduced demand for services, and wider social and wellbeing impacts.
6. That the Committee recognises and recommends amendments to the proposal to ensure that it avoids perverse incentives for short-term decision-making, including deferral of maintenance and renewals and discouraging investment in resilience measures and whole-of-life planning.
7. That the Committee ensures that the proposal recognises the need to ensure that implementation settings and any new metrics are available well in advance of councils' 2027 Long-Term Plan processes (i.e. no later than June 2026).
8. That any other levy or charge set by a third party and collected via the rating system be excluded from the model.

B. Endorse the following additional recommendations requested by the Manawatū District Council in its submission:

9. That the price change measure be strengthened by using Stats NZ capital and construction-related indices, such as the Capital Goods Price Index (CGPI) and relevant construction measures within the Producer Price Index framework, as these are more reflective of council cost escalation pressures than CPI and are independently produced and transparent.

10. That Government consider a pathway for the use of a local government cost index (LGCI), including the BERL local government cost adjustors, noting that such an index may be more cost-reflective than CPI but would require appropriate independent governance and commissioning arrangements (for example, direct central government commissioning or a Stats NZ-led approach) to meet neutrality and independence requirements for inclusion in a national formula.
11. That Government address the treatment of GST on rates as part of wider local government funding reform. MDC recommends that either GST be removed from rates or, alternatively, that GST collected on rates be retained by local authorities to support local service delivery and infrastructure investment.
12. That the minimum target not be set solely by reference to inflation, and instead recognise that councils face demand and regulatory pressures not captured by inflation measures (including population and demographic change, compliance requirements, asset renewal needs, and climate resilience obligations). Undue pressure on councils could increase the risk of deferred maintenance, reduced service standards, and increased operational and compliance risk.
13. That the model recognise the impacts of growth in rating units when assessing affordability and changes in rates burden, noting that headline rates increases do not necessarily reflect the burden on existing ratepayers (as demonstrated by MDC's 2025/26 rates increase, where growth absorbed part of the overall increase). Note – in giving effect to this recommendation, the formula may need to be amended to replace “population growth” and “average residential population” with “household growth” and/or “increase in the number of rating units.”
14. That the model explicitly address the risk that, if the target band becomes binding, councils may be incentivised to underfund depreciation and defer asset reinvestment, and that this be treated as a key unintended consequence to be avoided in the final design.
15. That Government clarify the scope and operation of the exclusion for “water charges and water-related targeted rates”, including whether the exclusion applies to waters-related costs funded through general rates, to avoid inequity between councils based on rating structure and to prevent perverse incentives for councils to restructure rating policies for compliance rather than sound long-term funding decisions.
16. That the model and any associated guidance explicitly recognise that councils' financing costs may not respond immediately to movements in headline interest rates, due to fixed-term borrowing and hedging profiles, and that assumptions or settings in the model should avoid overstating councils' capacity to “benefit” from short-term interest rate movements.
17. That Government ensure the variation/exception mechanism is clear, timely, and workable, including decision timeframes and a lighter-touch pathway for emergency and disaster events, to reduce the risk of delayed essential works and unintended service impacts.

If given the opportunity, MDC does wish to be heard in respect of this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Ford', with a long, sweeping horizontal stroke extending to the right.

Michael Ford

Mayor

Attachment: Open Letter to Minister Watts on Rates Capping