

**Application for interim and final
authorisation under s88(1) of the
*Competition and Consumer Act 2010 (Cth)***

Lodged by:

The Municipal Association of Victoria
on behalf of itself and 48 local government councils

21 November 2019

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1 Summary

1.1 Background

This application is made by the Municipal Association of Victoria (**MAV**), on behalf of itself and the current Victorian local government councils described in this application (the **Participating Councils**). The current members of the buyers group are set out in Annexure A to this Application.

On behalf of the Participating Councils, MAV seeks interim and final authorisation under section 88(1) of the *Competition and Consumer Act 2010* (Cth) to engage in the proposed conduct described in section 4 of this application (**Proposed Conduct**). The Proposed Conduct involves pooling the individual electricity demand of the Participating Councils and placing a single tender into the market calling for proposals for the supply of retail electricity services and renewable energy certificates (ie, Large Scale Generation Certificates) (**LGCs**) from an electricity retailer. The tender will seek agreements between electricity suppliers for both power and green benefits in the form of LGCs at a minimum of one LGC for every MWh electricity consumed over the term of the agreement.

The Participating Councils consider the Proposed Conduct will provide significant public benefits by promoting investment in renewable energy, increasing the transaction cost savings for the Participating Councils, and encouraging increased competition for the supply of electricity to the Participating Councils.

[REDACTED]

2 Parties to the Proposed Conduct

2.1 Applicants

The applicant is MAV, a statutory corporation incorporated by the *Municipal Association Act 1907* (Vic). Its objects are to promote the efficient operation of municipal government throughout Victoria, and to supervise and protect the interests, rights and privileges of municipal corporations. MAV is the peak representative and lobbying body for Victoria's 79 councils. MAV's role includes lobbying for a 'fairer deal' for councils and their communities, raising the sector's profile, ensuring its long-term security and providing policy advice, strategic advice, insurance and procurement services to local government. MAV makes this application on behalf of itself and 48 participating councils listed in Annexure 1 (the **Participating Councils**). Each of the Participating Councils are local government bodies whose functions are prescribed by the *Local Government Act 1989* (Vic). The primary objective of each of the Participating Councils is to endeavour to achieve the best outcomes for the local community having regard to the long term and cumulative effects of decisions.¹

2.2 Applicant's address for service of documents

The Applicant's address for service of documents in respect of this Application is:

Carolyn Oddie
Partner
Allens
Deutsche Bank Place, 126 Phillip Street Sydney NSW 2000

[REDACTED]

¹ *Local Government Act 1989* (Vic) s3C(1).

3.4 Application for interim authorisation

MAV, on behalf of the Participating Councils seeks interim authorisation in respect of this authorisation to issue the request for tender to the market by 31 December 2019 to conduct the tender process, and negotiate the terms and conditions of their electricity supply agreements. MAV will not award the tender unless and until final authorisation is granted.

MAV submits that interim authorisation is justified because:

- (a) carrying out the tender process is unlikely to have any impact on any relevant market, as it will not result in any change in the purchasing behaviour of, or the entry into any final contracts by, the Participating Councils; and
- (b) any further delay to commencing the tender process will affect the ongoing electricity supply of some of the Participating Councils whose contracts are due to expire in the near future. Further, any delays may also impact on individual councils' ability to achieve any renewable energy policies and targets they may be required to achieve.

3.5 Rationale

Through the Proposed Conduct, the Participating Councils seek to establish an electricity supply to service their respective needs. The requirement that the preferred electricity supplier(s) source the electricity supply and acquire LGCs on a 1:1 basis reflects the Participating Council's commitment to promoting the investment of renewable energy sources, and supporting the achievement of renewable energy targets of some of the Participating Councils.

Further, with a combined annual demand of up to approximately 250GWh, the Participating Councils are being significantly affected by the high electricity prices in Victoria.² Accordingly, if the Proposed Conduct is not authorised, the Participating Councils are likely to face higher transaction costs and higher electricity costs. The Participating Councils consider this aggregation is likely to enable them to secure better prices and commercial terms for electricity, delivering financial savings and long-term certainty, which is essential to the efficient spending in pursuit of their primary objective to achieve the best outcomes for their respective local communities. The Participating Councils will use the electricity for a variety of different purposes to support the daily functioning and services provided by each of the councils in their local communities.

3.6 Provisions of the CCA which might apply to the Proposed Conduct

The Participating Councils may be considered competitors in the acquisition of electricity under the *Competition and Consumer Act 2010* (Cth) (CCA). It is possible, although the Participating Councils do not concede, that making and giving effect to the Proposed Conduct could be challenged on the basis that they contain provisions that, in the absence of immunity may contravene the CCA, including provisions:

- (a) having the purpose or effect of fixing, controlling or maintaining the price for goods or services acquired or likely to be acquired by the parties (ie, a cartel provision prohibited under sections 45AD(2), 45AF, 45AG, 45AJ, and 45AK of the CCA);
- (b) having the purpose of preventing, restricting or limiting the acquisition or likely acquisition of goods or services by the parties including an agreement not to acquire goods or services from a supplier unless the supplier accepts the terms and conditions offered by the parties and commitments on volume of electricity to be acquired (ie, cartel provisions prohibited under section 45AD(3), 45AF, 45AG, 45AJ, and 45AK of the CCA); or

² See Australian Energy Regulator, *State of the Energy Market 2018*, https://www.aer.gov.au/system/files/State%20of%20the%20Energy%20Market%202018%20-%20Full%20report%20A4_2.pdf, p.10

2.3 Other Persons who propose to engage in the Proposed Conduct

In addition to the current Participating Councils listed in Annexure 1, other persons who may seek to engage in the Proposed Conduct include the successful tenderer(s) who will be the other party to the relevant electricity supply contracts with the Participating Councils. Each Participating Council will enter into a separate agreement with the relevant electricity supplier(s).

3 The Proposed Conduct

3.1 Overview

The Participating Councils propose to collectively negotiate with electricity suppliers to secure cost competitive and reliable electricity supply. It is proposed that MAV, on behalf of the Participating Councils will conduct a tender process for the supply of retail electricity supply services and renewable energy certificates (ie, Large Scale Generation Certificates) (**LGCs**) from an electricity retailer. The process will be conducted in accordance with section 186 of the *Local Government Act 1989 (Vic)*. [REDACTED]

The tender will seek agreements between electricity suppliers for both power and green benefits in the form of LGCs at a minimum of a 1:1 basis. This equates to the supply of one LGC for every MWh electricity consumed over the term of the agreement, including the renewable power percentage (**RPP**). The LGCs purchased under the agreement must be sourced from a nominated Renewable Electricity Facility (or Facilities) that are:

- exporting electricity to the National Electricity Market (**NEM**);
- accredited to register LGCs under the RET Scheme; and
- generating electricity from wind, solar or any other renewable energy source approved by the Participating Councils in writing.

The tender will also include a committed volume arrangement where the Participating Councils commit to:

- (a) specified volumes based on the historical and annual usage volumes provided by each Participating Council or obtained via their current electricity retailers; and
- (b) accepting the outcome of the tender process provided the outcomes fall within particular pricing parameters.

The tenders will be evaluated by MAV in conjunction with the project's energy advisors and the nominated Tender Evaluation Panel comprised of representatives of the Participating Councils. The tenderers will be evaluated with respect to each account category type (ie, large, small, and unmetered accounts). This process will result in a summary report recommending one or more electricity suppliers which is provided to each of the Participating Councils prior to announcing an outcome. The Tender Evaluation Panel will review and either accept or reject the tender recommendation on behalf of the Participating Councils.

Once the Tender Evaluation Panel selects the successful tenderer(s), MAV will enter into an agreement with the successful tenderer in its capacity as aggregator. Each of the Participating Councils will then enter into an individual contract for the supply of electricity with the successful tenderer(s) on the same or substantially similar terms and conditions.

Specifically, MAV, on behalf of itself and each of the Participating Council's seek authorisation to:

- (a) collectively investigate potential electricity supply options for their combined electricity loads and determine price parameters through which Participating Councils commit to purchasing a specified load amount of electricity from the preferred supplier(s);
- (b) collectively conduct a tender process to select an electricity supplier(s) to supply the combined electricity loads of the Participating Councils;
- (c) establish a Tender Evaluation Panel to make recommendations to MAV and the Project Steering Committee based on the tender evaluation criteria;
- (d) consider tenders and negotiate an electricity supply agreement with the preferred electricity supplier(s) that enables the Participating Councils to access the price and other terms and conditions offered by the successful electricity supplier(s);
- (e) enter into a Standing Deed of Offer with the preferred electricity supplier(s) to supply electricity to each of the Participating Councils; and
- (f) following entry into the individual supply agreements, undertake contract management services throughout the term of the Standing Deed of Offer. MAV will also participate in decisions regarding the administration and operation of certain aspects of the electricity supply agreements, including performance and/or pricing reviews, the exercise of contract options, or any changes to terms and conditions.

(the *Proposed Conduct*).

3.2 Tender process

Subject to obtaining interim authorisation, and completing any preliminary investigations in relation to potential electricity supply options for the Participating Councils' combined electricity loads, a joint tender is intended to be conducted as follows:

- (a) the tender will be developed and approved by MAV before being issued to the broad electricity market;
- (b) the tender process will operate as an open tender to all suitably qualified suppliers of electricity;
- (c) MAV will review the responses to the tender and having selected one or more preferred tenderers, will make recommendations to the Project Steering Committee which will include representatives of MAV and some of the Participating Councils following tender evaluation by the Tender Evaluation Panel;
- (d) MAV will negotiate the contractual terms with the preferred tenderer or tenderers;
- (e) once negotiations are completed ([REDACTED]), MAV will make a recommendation to the Project Steering Committee on the preferred tenderer and contract terms; and
- (f) each of the Participating Councils will then undergo its own governance process to make a final decision as to whether or not to award the tender to the preferred tenderer.

3.3 Ongoing administration of electricity supply agreements

Once the preferred supplier(s) are agreed, it is intended that each of the Participating Councils will be responsible for administering its own electricity supply agreement with the preferred supplier(s) without ongoing consultation with other Participating Councils. It may be necessary for MAV, in consultation with the Participating Councils to participate in various activities and decisions regarding the operation and administration of the electricity agreements, including performance and/or pricing reviews, the exercise of contract options, or any changes to terms and conditions.

- (c) having the purpose, or likely to have the effect of substantially lessening competition (s 45(1)(a)-(b) of the CCA).

As local government bodies, each of the Participating Councils may be able to benefit from the immunity provision in section 2BA of the CCA which limits the application of the CCA to the extent that the local government body carries on business. Although the Councils may be able to benefit from this immunity in relation to the Proposed Conduct, the Participating Councils wish to have certainty afforded by authorisation that the Proposed Conduct does not breach these prohibitions and cannot be challenged on the ground that they have the purpose, effect or likely effect of substantially lessening competition, prohibited under section 45(2)(a)(ii) of the CCA.

3.7 Term of authorisation sought

The Participating Councils seek authorisation for a period of eleven years which is sufficient time for the tender process to be undertaken and to cover the length of the proposed agreements..

4 Persons who may be directly impacted by the Proposed Conduct

Other than current Participating Council other persons who may be directly impacted by the Proposed Conduct include electricity suppliers, which will have the opportunity to participate in the tender process, described in further detail in section 3.2 above.

5 Market information and concentration

5.1 Electricity Markets

In light of the ACCC's previous consideration of similar conduct below), the Participating Councils consider the following markets may be relevant to the assessment of the Proposed Conduct's effect on competition:

- (a) the market for the generation and wholesale supply of electricity in the National Electricity Market (*NEM*) or, in the alternative, in one or more regions of the NEM, including Victoria; and
- (b) the market for the retail supply of electricity in Victoria.

Wholesale electricity in eastern and southern Australia is traded through the NEM, covering the Australian Capital Territory, New South Wales, South Australia, Queensland, Victoria and Tasmania. Generators in the NEM sell electricity through a wholesale spot market in which changes in the supply-demand balance determine prices.

The main customers are energy retailers who buy electricity from the wholesale market, package it with transmission and distribution network services, and sell it to energy customers. The total consumption of electricity in the NEM in 2018-19 was 195.7TWh, of which Victoria consumed 44.7TWh.³ While Victoria is a net exporter of electricity, exports are partially offset by hydro generation imports from Tasmania.

The Participating Members' combined electricity demands equate to less than 0.13% of the total consumption in the NEM, and 0.6% of the total consumption in the Victorian market.

6 Counterfactual

If the Participating Councils are unable to proceed with the Proposed Conduct, each individual council will need to independently pursue a source of supply of electricity.

³ Australian Energy Regulator, *Electricity supply to regions of the National Electricity Market*, <https://www.aer.gov.au/wholesale-markets/wholesale-statistics/electricity-supply-to-regions-of-the-national-electricity-market>, as at 18 October 2019.

This is likely to significantly diminish the ability of the Participating Councils to realise the cost savings and efficiencies sought by the Proposed Conduct.

Specifically, if the ACCC does not grant the Participating Councils authorisation to engage in the Proposed Conduct, they will be required to pay higher transaction costs and higher electricity input costs, which would reduce the expenditure that each of the Participating Councils have available to spend on other projects servicing their respective local communities.

7 Public benefit

The term 'public benefit' is not defined in the CCA. However, the Tribunal has stated that the term should be given its widest possible meaning. In particular, it includes:

... anything of value to the community generally, any contribution to the aims pursued by society including as one of its principal elements ... the achievement of the economic goals of efficiency and progress.⁴

The Proposed Conduct will result in a range of public benefits, which include:

- (a) transaction cost savings that will benefit the Participating Councils;
- (b) potential for increased competition for the supply of electricity to the Participating Councils;
- (c) increased environmental benefits; and
- (d) greater economies of scale and efficiency.

The ACCC has previously considered a number of applications for authorisation of a similar nature:

- In June 2018, the ACCC granted authorisation to The South Australian Chamber of Mines and Energy on behalf of itself and 27 other participating group members to form a joint electricity purchasing group in South Australia, for a period of 11 years.⁵ The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, increased competition for the generation and wholesale supply of electricity in South Australia, and greater economies of scale and efficiency through a single supply arrangement rather than individual supply arrangements for each of the applicants.
- In August 2017, the ACCC granted authorisation to the Eastern Energy Buyers Group (**EEBG**) (comprising industrial energy users who operate in the agriculture industry) to establish a joint energy purchasing group for a period of 11 years.⁶ The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, potential for increased competition for the supply of electricity and gas, and incentives for investment in generating capacity.
- In July 2016, the ACCC granted authorisation to Melbourne City Council along with 13 other entities (comprising three other local councils, two tertiary education institutions and two banks) to jointly negotiate the terms and conditions of certain electricity sale agreements and to conduct a collective tender process for a period of 15 years.⁷ The ACCC found that the proposed conduct was likely to result in public benefits including transaction cost savings, greater economies of scale and efficiency, the potential for increased competition for the retail supply of renewable electricity, and environmental benefits from any resulting additional reduction in greenhouse gas emissions.

⁴ *Queensland Co-operative Milling Association Ltd* (1976) ATPR 40-012 at 17,242; cited with approval in *Re 7-Eleven Stores* (1994) ATPR 41-357 at 42,677.

⁵ The South Australian Chamber of Mines and Energy Inc & Ors - Authorisations A91567 & A91568.

⁶ The Eastern Energy Buyers Group – Authorisations A91594 & A91595.

⁷ Melbourne City Council & Ors – Authorisations A91532 & A91533.

7.1 Transaction cost savings

Each Participating Council individually tendering and contracting for their electricity supply will incur transaction costs, such as the time taken to negotiate and other costs such as obtaining technical and legal advice. Potential suppliers will also incur transaction costs in negotiating with the members individually. Accordingly, the Proposed Conduct will save the time and expenditure that would be incurred by each Participating Council if required to conduct separate tender processes.

7.2 Potential for increased competition for the supply of electricity to the Participating Councils

At present, customers of the size of an individual council do not have any meaningful bargaining power in the Victoria market.

The combined load offered by the Participating Councils, and the proposed length of the electricity supply agreements, is likely to attract a range of electricity retailers, and is a more attractive prospect than supplying electricity to any individual Council. It may also encourage other electricity suppliers who would not have otherwise supplied the Participating Councils to compete for the tender.

7.3 Increased environmental benefits

Each of the Participating Councils is committed to promoting the investment in renewable energy through the acquisition of LGCs in order to reduce the impact of greenhouse gas emissions on the environment.

In the first three months of 2019, Australia's emissions reached the highest on record, driven by an increase in emissions from the electricity sector.⁸ According to Ndevr Environmental, an emissions-tracking organisation that publishes quarterly greenhouse gas emissions data, emissions from electricity generation have increased 8.2% during the previous quarter (ie, FY2019 Q2 (ie, October, November and December 2018)) from 42.9 Mt CO₂-e to 46.4 Mt CO₂-e. With respect to large scale electricity generation, Victoria generated 10.1 TWh in Q1 2019 with 11.0% coming from renewable sources such as wind and hydro power, down from 11.8% renewable generation in the previous quarter.

'Renewable energy' is energy that can be obtained from natural resources and can be replenished using renewable energy technologies such as bioenergy, hydropower, and geothermal, ocean, solar and wind energies. Using renewable energy is sustainable, and can be produced with little to no carbon emissions.

The importance of increasing the production and use of renewable energy, over traditional sources, is reflected in Australia's Renewable Energy Target (*RET*). As of June 2015, the RET aims to ensure that at least 33,000 GWh of Australia's electricity comes from renewable sources by the year 2020.

LGCs are created annually based on the actual amount of electricity generated by a renewable energy generation system registered with the Clean Energy Regulator under the *Renewable Energy (Electricity) Act 2000*. LGCs are traded in an open market, and are generally bought and surrendered by RET-liable entities to fulfil their statutory surrender obligations. The number of LGCs a retailer is required to surrender each year is determined by multiplying the amount of electricity it acquires annually by the renewable power percentage (*RPP*). In 2019, the RPP was 18.60%.⁹ To participate, electricity generators must generate electricity from eligible natural resources (eg, sun, wind, and agricultural waste). One LGC is equal to one MWh of renewable energy. Ownership of a LGC signifies a megawatt hour (MWh) of renewable energy that has been supplied to the grid.

⁸ Ndevr environmental, *Tracking 2 Degrees FY2019 Q3 – Quarterly Report, Q3/FY2019*. Available at: <https://ndevrenvironmental.com.au/tracking-2-degrees-fy2019-q3/>.

⁹ <http://www.cleanenergyregulator.gov.au/RET/Scheme-participants-and-industry/the-renewable-power-percentage>

The public benefit in reducing greenhouse emissions is clear, as all members of the public have an interest in preserving the quality of air, water and living standards for current and future generations. Further, Australia's commitment under the Paris Agreement to contribute to achieving no more than 2 degrees of global warming is estimated to require Australia to reduce greenhouse gas emissions by between 26-28% by 2030.¹⁰

By purchasing LGCs, the Participating Councils seek to promote investment in renewable energy projects.

7.4 Greater incentives for investment in generating capacity

The ACCC has previously accepted that a single supply arrangement has the potential to result in greater economies of scale than multiple individual supply arrangements, where production costs per unit of production fall as the volume generated increases. For example, the ACCC recognised that the volume of electricity sought to be collectively acquired by the EEBG (totalling 0.38% of Victorian electricity consumption) may incentivise investment in new generation systems. This might include a small-scale power purchase agreement, where EEBG would commit to acquire the generator's capacity up front.

While the Participating Council's combined demand is small in market terms (see section 5.1 above and Figure 1 below), it is of a sufficient size to promote new investment.

8 Public detriment

The Participating Councils consider that the Proposed Conduct will not have any material public detriment, and, is to likely to promote rather than lessen competition in any relevant market.

As stated in section 5.1 above, the Participating Members' combined electricity demands equate to less than 0.13% of the total consumption in the NEM, and 0.6% of the total consumption in the Victorian market.

Figure 1 Annual consumption of electricity – FY2018-19

Participating Councils	Victoria	NEM
0.25TWh	44.7TWh	195.7TWh

Whether the relevant market is the NEM (or in one or more regions of the NEM, including Victoria) or the Victorian electricity market, the amount of electricity the Participating Councils wish to purchase is comparatively small that it cannot have any material impact on competition in any wholesale retail market.

Further, the tender process is open and transparent and will ensure that there will be competition between retail electricity suppliers to win the contracts.

9 Relevant market participants

As noted above, the classes of persons directly impacted by the Proposed Conduct include electricity suppliers, which will have the opportunity to participate in the tender process described in section 3.2 above.

¹⁰ Australian Government – Department of the Environment and Energy, *Paris Agreement*, <https://www.environment.gov.au/climate-change/government/international/paris-agreement>

10 Declaration by applicant

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned undertake(s) to advise the ACCC immediately of any material change in circumstances relating to the application.

The undersigned are aware that giving false or misleading information is a serious offence and are aware of the provisions of sections 137.1 and 149.1 of the Criminal Code (Cth).



Signature of authorised person

Partner, Allens (Solicitor on behalf of the Applicant)

Carolyn Oddie

This 21st day of November 2019

Annexure A – Participating Councils

	Participating Councils	ACN
1.	Ararat Rural City Council	92 492 188 087
2.	Ballarat City Council	37 601 599 422
3.	Banyule City Council	16 456 814 549
4.	Bass Coast Shire Council	81 071 510 240
5.	Brimbank City Council	35 915 117 478
6.	Buloke Shire Council	89 293 793 980
7.	Campaspe Shire Council	23 604 881 620
8.	Central Goldfields Shire Council	82 120 379 784
9.	City of Boroondara	83 441 314 965
10.	City of Greater Bendigo	74 149 638 164
11.	City of Greater Dandenong	41 205 538 060
12.	City of Greater Geelong	18 374 210 672
13.	City of Whittlesea	72 431 091 058
14.	Darebin City Council	75 815 980 522
15.	East Gippsland Shire Council	81 957 967 765
16.	Glen Eira City Council	65 952 882 314
17.	Golden Plains Shire Council	86 998 570 296
18.	Greater Shepparton City Council	59 835 329 843
19.	Hepburn Shire Council	76 845 763 535
20.	Hobsons Bay City Council	24 936 107 898
21.	Horsham Rural City Council	37 019 724 765
22.	Hume City Council	14 854 354 856
23.	Indigo Shire Council	76 887 704 310
24.	Loddon Shire Council	90 925 450 534
25.	Macedon Ranges Shire Council	42 686 389 537
26.	Manningham City Council	61 498 471 081
27.	Maribyrong City Council	86 517 839 961
28.	Maroondah City Council	98 606 522 719
29.	Melton City Council	22 862 073 889
30.	Mildura Rural City Council	42 498 937 037
31.	Mitchell Shire Council	27 352 592 142
32.	Moira Shire Council	20 538 141 700
33.	Monash City Council	23 118 071 457

	Participating Councils	ACN
34.	Moonee Valley City Council	54 651 216 324
35.	Mount Alexander Shire Council	12 966 477 062
36.	Murrindindi Shire Council	83 600 647 004
37.	Pyrenees Shire Council	94 924 356 468
38.	South Gippsland Shire Council	67 816 770 786
39.	Starthbogie Shire Council	50 882 781 013
40.	Stonnington City Council	67 688 032 530
41.	Surf Coast Shire Council	18 078 461 409
42.	Swan Hill Rural City Council	97 435 620 016
43.	Warrnambool City Council	44 594 264 321
44.	Wellington Shire Council	18 420 243 468
45.	Whitehorse City Council	39 549 568 822
46.	Wodonga City Council	63 277 160 265
47.	Wyndham City Council	38 393 903 860
48.	Yarra Ranges Shire Council	21 973 226 012