25 May 2018

2018 water price review
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000

water@esc.vic.gov.au
Issued via Email (original not following in mail)

Dear Sir / Madam,

Western Water - Water Price review

This letter is in response to the draft decision issued by the Essential Services Commission (ESC) on 27 April 2018 in relation to Western Water’s price submission. The decision by the ESC to accept Western Water’s price submission appears to have been done so without consideration of the points outlined in our letter dated 23 April 2018, specifically a review of the assumptions behind the calculation of New Customer Contribution rates and the forecast capital expenditure has not been undertaken.

A copy of our previous letter is enclosed for your consideration again. We would welcome the opportunity to assist the ESC and Western Water in engaging with industry bodies such as the Urban Development Institute of Australia (UDIA) to include an accurate forecast of lot production and accordingly review the capital works program and budget.

We appreciate the opportunity to contribute and provide feedback to Western Water’s pricing submission and if you would like to discuss further please do not hesitate to contact the undersigned on [Contact Information]

Yours sincerely

Matthew Dean
Woodlea Project Director
23 April 2018

2018 water price review
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000

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Issued via Email (original not following in mail)

Dear Sir / Madam,

Western Water - Water Price Review

Woodlea is a 7,000 lot master planned community located in Rockbank and has been one of Australia’s fastest growing communities since launching 3 years ago having sold approximately 2,500 lots to date. Woodlea is located within Western Water’s region and accordingly is a key stakeholder, we write to provide feedback to Western Water’s recently submitted Price Submission for the 2018-2020 period.

After review of the submission we provide the following comments and recommendations for consideration by the Essential Services Commission (ESC) as part of the process.

1. NEW CUSTOMER CONTRIBUTIONS (NCC’S)

Section 15 of the submission relates to the setting of New Customer Contributions (NCC’s) as well as forecast NCC revenue.

Tables 24 and 25 relate to the forecast review generated from collection of NCC’s which is driven by Western Water’s assessment of NCC lots. The estimate of the number of greenfield lots produced appears to be very conservative and not reflective of current or anticipated volumes. Woodlea has sought recent sales data for the catchment area on the basis that this provides the best guide to forecast creation of lots and NCC payments over the next two years. ‘National Land Survey Program’ data provided from Research 4 calculates the number of greenfield sales across Melton, Sunbury and Bacchus Marsh in the 18 months prior to March 30, 2017 to be 7,794 lots. All of these areas are located within Western Water’s catchment with the exception of small parts of Melton East, this suggests Western Waters estimate of 1773 lots is grossly under estimated. This is further compounded by the recent approval of PSP’s in Plumpton & Kororoit and soon to be approved PSP’s in Sunbury, which will bring an unprecedented increase in the level of activity in the next 12 months. By under estimating the number of lots Woodlea is concerned the scheduling and budget for capital works will be insufficient.

Recommendation: The ESC engage with the relevant local municipalities and industry bodies such as the Urban Development Institute of Australia (UDIA) to obtain an accurate forecast of lot production and accordingly review of the capital works program and budget.
The proposed increase in NCC’s at 36.7% over 2 years is excessive and not reflective of similar water retailers such as the adjacent City West Water. Given Western Water is no longer providing recycled water to new developments the direct comparison of NCC’s in 2020 is as follows:

City West Water (Sewer and Water)  $1,382.58
Western Water (flat rate regardless of service)  $5,900.00

Western Waters Fees are 327% higher that City West Water which are also challenged with the significant growth. Home owners should not be burdened with the additional cost.

Recommendation: Western Waters NCC’s be reviewed and brought into line with the Melbourne Metropolitan water retailers.

2. CAPITAL WORKS PROGRAM

A review of the capital works program in appendix 4 lacks detail and transparency. However, from the limited information provided, the funds allocated for infrastructure in the Woodlea precinct is significantly less than what is forecast. Woodlea have worked proactively provided to Western Water a realistic program for delivery of major infrastructure to assist preparation of the water plan 4. Please see attached letter dated 10 July 2018 addressed to Western Water. Note all assets and timing shown on the drawings are with areas which have planning permits and active works under construction.

The Aintree Pump Station has been identified in the report as a significant project. Woodlea have worked closely with Western Water on the design and delivery of the pump station, it is noted that the capital allocation in the Price Submission for this project is grossly under estimated at $2.342m as the estimated costs provided to Western Water are approximately $8m.

The following table that is has also been provided to Western Water and provides a breakdown of the key infrastructure that is forecast to be constructed timing over the next 2 years.

WOODLEA
WESTERN WATER REIMBURSABLE ASSETS
ANTICIPATED DELIVERY IN CORPORATE PLANS 2018-19 & 2019-20

<table>
<thead>
<tr>
<th>Water Infrastructure</th>
<th>Commencement</th>
<th>Completion</th>
<th>Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 40 - 450mm DW (321km) (WW/WW158)</td>
<td>13-06-18 FY18/19</td>
<td>13-06-19 FY19/20</td>
<td>$289,579</td>
</tr>
<tr>
<td>Stage 41 - 235mm DW (548km) (WW/WW159)</td>
<td>18-06-18 FY18/19</td>
<td>18-06-19 FY19/20</td>
<td>$57,240</td>
</tr>
<tr>
<td>Taylors Road Phase 3 375mm DW &amp; 300mm AWW</td>
<td>01-01-19 FY19/20</td>
<td>01-07-19 FY19/20</td>
<td>$89,000</td>
</tr>
<tr>
<td>Stage 42 - 450mm DW (224km) (WW/WW161), 275mm DW (200km) (WW/WW160), 225mm DW (300km) (WW/WW160)</td>
<td>16-09-19 FY19/20</td>
<td>16-09-20 FY20/21</td>
<td>$291,436</td>
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</table>

<table>
<thead>
<tr>
<th>Sewer Infrastructure</th>
<th>Commencement</th>
<th>Completion</th>
<th>Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 32 - 300mm BS (252km) (WW/WW101 &amp; 204)</td>
<td>05-06-19 FY18/19</td>
<td>05-06-20 FY19/20</td>
<td>$249,400</td>
</tr>
<tr>
<td>Stage 34 - 300mm BS (242km) (WW/WW101)</td>
<td>05-06-19 FY18/19</td>
<td>05-06-20 FY19/20</td>
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<td>Stage 36 - 300mm BS (526km) (WW/WW101)</td>
<td>05-06-19 FY18/19</td>
<td>05-06-20 FY19/20</td>
<td>$701,665</td>
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<tr>
<td>Stage 38 - 750mm BS (294km) (WW/WW159), 600mm BS (111km) (WW/WW158), 300mm BS (210km) (WW/WW157)</td>
<td>28-06-19 FY18/19</td>
<td>28-06-20 FY19/20</td>
<td>$2,306,621</td>
</tr>
<tr>
<td>Stage 41 - Woodlea Precinct 3- 300mm AWW (WW/WW158), 150mm SMR (150km), 925mm SMR (150km) (WW/WW156)</td>
<td>15-11-18 FY19/20</td>
<td>15-11-19 FY20/21</td>
<td>$1,391,020</td>
</tr>
<tr>
<td>Bonnie Brook AWW - Woodlea Precinct 3- 325m</td>
<td>15-11-18 FY19/20</td>
<td>15-11-18 FY20/21</td>
<td>$7,120,000</td>
</tr>
</tbody>
</table>

$ 13,203,280
The total forecast capital expenditure on Western Water funded projects is estimated at approximately $13.2m however it is noted that in Table A5 of Appendix 4 the capital allocated to the ‘Rockbank Catchment’ is just $1.996m. Given that these projects are located within areas that have planning permits, include pre-sold lots and designs and construction are well advanced, the projects should be included within Western Water’s capital expenditure program and not subject to bring forward costs.

Recommendation: The ESC and / or Western Water provide a plan or breakdown of infrastructure timing in the growth corridors to ensure timely delivery in line with forecast development rates. We appreciate the opportunity to contribute and provide feedback to Western Water’s pricing submission and would welcome the opportunity meet and discuss our concerns highlighted above. Please do not hesitate to contact the undersigned on [redacted]

Yours sincerely

[Signature]

Matthew Dean
Woodlea Project Director
Our Reference 303450/R3

10 July 2017

Mr. Robert Murphy
General Manager Capital Program & Delivery
Western Water

Via Email (original not following in mail)

Dear Rob,

Woodlea Estate – Water Plan 4 Capital Allocations

At Woodlea’s meeting with Western Water of 16 June, Spiire/ Woodlea undertook to provide forecast dates for sewer and water shared assets in the Woodlea Estate north of Taylors Road. These dates are marked up on the attached strategy plans and reflect Woodlea’s realistic development program, noting that most of the works will be within Precinct 3, with the first stage starting construction at the end of this year.

You will also note that the construction of the Frontier Avenue extension along the west side of the Active Open Space and the Government Secondary School are timed to align with the development of the open space and expected land transfer of the school site. Beattys Road between Leakes Road and Frontier Avenue will need to be constructed in conjunction with development of Precinct 5, so as to provide a further connection to Leakes Road as traffic volumes increase.

For context, the current Precinct 3 staging plan and the overall Estate Masterplan (identifying precincts 5 & 7) are also attached.

We ask that Western Water takes account of these delivery forecasts in the preparation of its Capital Works allocations to ensure sequential development of Woodlea is facilitated with the timely provision of sewer and water infrastructure funded in Water Plan 4.

These forecasts can be further discussed at our meeting of Friday 14th July.

Yours sincerely

Elizabeth Hamila
Principal – Spiire Engineering

Enclosure
   1. Woodlea Precinct 3 water and sewer shared assets – delivery forecasts
   2. Precinct 3 Draft Concept and Staging Plan
   3. Woodlea Estate Masterplan

Copy to: Charbel Youssef
Development Manager
Woodlea

Matthew Dean
Project Director
Woodlea