Coliban WATER

18 February 2026

Gerard Brody
Chairperson
Essential Services Commission

Via email: [redacted]

Dear Gerard

Getting to Fair: Advancing Equity strategy

Thank you for the opportunity to provide feedback on your draft *Getting to Fair: Advancing Equity* strategy, which builds on the important work the Commission led with the original Getting to Fair 2021-2021 strategy, removing barriers for customers experiencing vulnerability in accessing essential services.

In reviewing the draft, we provide the following for consideration:

- Ensure that priority actions are clear and unambiguous. Case studies and examples would be beneficial, as they can play an important role in ensuring clarity for providers to implement actions that deliver the intended outcomes.

- As a customer funded regional water corporation, the cost of implementation will ultimately be borne by customers. This should be a consideration to ensure the good intent of the strategy is not lost in the 'cost of compliance'. Priority Theme 1 does note that the ESC will recognise the cost and benefits of additional obligations, and we suggest this needs to be clear and transparent.

- We recognise the importance of supporting First Nations community, as noted in the draft, and are already leading some of this work locally through our Innovate RAP, partnering with DJAARA to design a culturally safe financial support and hardship assistance program as well as designing culturally respectful approaches to engagement. This work will also be built into our engagement programs for Price Submission 2028.

Our team would be happy to be involved further in any conversations regarding the draft or to discuss any of the points above.

Yours sincerely

[redacted]

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