

9 September 2024

Marcus Crudden
Executive Director, Price Monitoring and
Regulation
Essential Services Commission
Level 8, 570 Bourke Street
MELBOURNE VICTORIA

By email: water@esc.vic.gov.au

Dear Marcus

Yarra Valley Water's submission to the Essential Services Commission's August 2024 draft guideline on self-reporting non-compliance with the Water Industry Standards

We welcome the opportunity to provide a response to the Commission's draft guideline on self-reporting non-compliance with the Water Industry Standards 13 August 2024. We also welcome the collaborative approach the Commission has taken to develop this guideline.

The draft guideline provides clarity and examples to support water business decision making on reporting to the Commission, including:

- Definition of key terms
- Sections of the Water Industry Standard, and/or examples of non-compliances against the Water Industry Standard that would give rise to a material adverse impact
- Expectations of the Commission in relation to the form of reporting including timeframes, minimum data and information requirements
- Case studies covering both reportable and non-reportable scenarios including the rationale.

Following discussions internally and at the industry workshop, we request the Commission consider:

- amending the guideline to require initial information be provided to the Commission within two to three business days but no later than five business days after identification. This would help a water business balance the immediate needs of the impacted customer/s with the reporting requirements.
- flexibility around the form of self-reporting to include Commission's template, email or other means of communication.

We note the inclusion of both reportable and non-reportable examples through the guideline, and the rationale is valuable for water businesses understanding of the Commission's expectations. We'd welcome inclusion of additional examples of both reportable and non-reportable scenarios in the final guideline.

If you have any questions in relation to our response, please do not hesitate to contact Cindy Kozel, Water Resources and Regulatory Economist on [REDACTED] or by email at [REDACTED]

Yours sincerely



Pat McCafferty
Managing Director


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