

21 July 2025



Our Ref: 180/015/058

The Water Team, Price Monitoring and Regulation
Essential Services Commission
Level 8, 570 Bourke Street
Melbourne Vic 3000

Dear Water Team

REVIEW OF NEW CUSTOMER CONTRIBUTIONS – REPORT ON INTERESTED PARTIES FEEDBACK

Please find below Lower Murray Water (LMW) response to the Review of New Customer Contributions (NCC's) Report on Interested Parties' feedback, including our comments on several areas identified for improvement:

- **2.3 - Standard vs negotiated NCCs**

LMW supports the principle that negotiated NCCs should be an exception rather than the norm, particularly in cases where development planning & sequencing are clearly understood,

We would welcome further guidance from the Commission on the criteria that determines when a development qualifies for a standard NCC and when a negotiated NCC may be appropriate.

- **2.4 - Monitoring of NCC implementation**

LMW does not support the introduction of additional regulatory reporting requirements related to NCC implementation, as this would impose an unnecessary administrative burden on staff. Water corporations have already been subject to increased obligations to demonstrate support for the Victorian Governments Housing Statement. LMW believes introducing further requirements would be inconsistent with the Victorian Government's Economic Growth Statement and its Regulatory Burden Reduction Targets.

- **3.3 - Locational versus network based NCCs**

LMW supports a standardised NCC pricing approach across its entire service region to ensure equity for all developers. This approach helps avoid perceptions that certain areas are more economically favourable for development than others.

A standardised NCC is consistent with LMW's water and wastewater tariff principles, which apply uniform pricing across the service region. This ensures that smaller townships, which may be more expensive to service, are not unfairly disadvantaged. LMW believes that aligning the NCC approach with these established principles represents the most equitable and effective path forward.

We look forward to participating in the upcoming workshops scheduled for August and September and the continued collaboration with the Commission as part of this important review process.

Yours Sincerely

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