

Our Ref: A4431077

19 July 2022

Mr Marcus Crudden
Executive Director, Price Monitoring and Regulation
Essential Services Commission
Level 8, 570 Bourke Street
MELBOURNE VIC 3000

Dear Mr Crudden,

Draft Guidance on the 2024 Goulburn Murray Water price review

Thank you for the opportunity to review and provide feedback on the Commission's draft guidance for Goulburn-Murray Water's (GMW) 2024 Price Submission due 29 September 2023.

GMW have completed a review of the draft guidance and provide the following minor comments:

- Page 29 and 34 Note 39 includes a list of our water supply districts however should also include 'Mitiamo'.
- Page 37 the draft guidance notes that "the opening RAB 1 July 2024 = RAB at July 2020, adjusted to reflect 2023/24 actuals". GMW believes this should refer to 2019/20 actuals (instead of 2023/24 actuals).

The draft guidance paper provides GMW with sufficient scope to proceed with developing a pricing submission that meets the ESC requirements.

GMW notes the guidance material relating to:

- Form of price control (ESC anticipate GMW will continue to use a Revenue Cap form of price control – including a +/- 10% rebalancing constraint)
- Regulatory Period (ESC proposes a four year period commencing 1 July 2024)

Should GMW seeks to propose an alternative as part of the 2024 Pricing Submission we will engage with the ESC as soon as possible and engage our customers as required by the guidance.

GMW will continue to engage with the Commission officers to clarify any further aspects of the guidance if required.

GMW looks forward to developing the 2024 Pricing Submission with our customers and stakeholders for assessment by the Essential Services Commission.

Yours Sincerely



Charmaine Quick
MANAGING DIRECTOR

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