



Marcus Crudden
Executive Director, Price Monitoring and Regulation
Essential Services Commission
570 Bourke Street, Melbourne 3000
<Submitted via Engage Victoria Portal>

11 November 2025

Dear Marcus

New Customer Contributions (NCC) Review 2024
GWW submission to ESC *Draft New Customer Contributions Framework*
October 2025

Greater Western Water (GWW) welcomes the opportunity to provide feedback on the Essential Services Commission's (ESC) *Draft New Customer Contributions Framework* ("draft NCC framework") released on 14 October 2025. This follows GWW's submission in late 2024 on the ESC's NCC consultation paper and our participation in the ESC's industry workshops in August and September 2025.

GWW supports the ESC's intent to improve the consistency, transparency and efficiency of the NCC framework through updated guidance, models, case studies and training. The review provides a valuable opportunity to align customer contribution practices across the sector and strengthen the link between NCCs, growth planning and customer outcomes.

Overall framework

GWW agrees with the ESC's objective of maintaining a principles-based framework that provides greater clarity on application, limits the administrative burden through using standard charges while also recognising local context and the diversity of development patterns across water corporations. The proposed Connection Policy and NCC monitoring framework are positive steps towards improved transparency and accountability.

Feedback on key implementation matters

NCC monitoring

GWW encourages the ESC to consider incorporating the proposed NCC monitoring requirements into the existing annual *Water Industry Performance Audit* process. This would help minimise the administrative burden by streamlining compliance obligations for water corporations.

GWW sees value in aligning the definitions, terminology and data parameters for NCC metrics where there is a comparable metric collected under DEECA's Housing Statement Reporting, as this process has already resolved data challenges. GWW

also requests clarity on whether the metrics apply to all pathways through which new customers can become connected (for example, upsizing may incur standardised NCCs yet it is unclear if this would be captured by the 'new connection' lens of the metrics).

Supporting materials for 2028 Price Submission (PS2028) preparations

GWW looks forward to the final NCC framework being released by the ESC in December 2025. We would welcome the additional training materials, case studies and NCC model with detailed guidance for application as early as possible in 2026 so that we can incorporate these into our PS2028 preparations and engagement program, which are already underway. Furthermore, early provision of the full PS2028 Guidance Paper, including the NCC guidance changes, will ensure we can consider the broader implications under the PREMO framework.

Connection policy and guidance

GWW supports the requirement for each business to prepare a Connection Policy as part of the PS2028. We welcome early release of example model templates, and case studies illustrating the ESC's expectations on how costs and benefits should be attributed, how standard versus negotiated NCCs should be justified, and how dispute resolution processes (including funding arrangements) should be presented.

Next steps

GWW appreciates the constructive engagement by the ESC throughout the NCC Review and looks forward to the final release of the framework in December 2025, along with the supporting tools and materials that will assist all water businesses in the development of PS2028.

To support refinement of the proposed NCC framework, GWW would welcome the opportunity to walk through some case studies illustrating different types of newly serviced or connected customers. These examples could help test understanding of the framework's definitions, applicability, identify areas of compliance or ambiguity, and highlight practical opportunities to improve consistency and insight.

Should you have any further questions please reach out to [REDACTED].

Kind regards
[REDACTED]

[REDACTED]
Greater Western Water
[REDACTED]