

20 October 2025

Gerard Brody
Commissioner and Chairperson
Essential Services Commission
Level 8, 570 Bourke Street
MELBOURNE VIC 3000

Dear Gerard

Re: Proposed billing exception approval for Greater Western Water

VicWater is the peak industry association for the Victorian water sector and all 18 Victorian water corporations are our members. We support our members to be 'better together' by facilitating industry advocacy, collaboration and innovation to achieve better outcomes for customers, community and the environment.

I am writing in response to the consultation regarding Greater Western Water's (GWW) proposed billing exception approval and enforceable undertaking, as published on the Engage Victoria website.

VicWater supports a regulatory outcome that is fair and reasonable, and consistent with the objectives outlined in the *Essential Services Commission Act 2001 (Vic)*, particularly sections 8 and 8A.

Section 8 of the Act sets out the Commission's primary objective "to promote the long term interests of Victorian consumers".

Section 8A outlines the matters the Commission must consider in achieving this objective, including:

- The efficiency of regulated industries and incentives for long-term investment
- The financial viability of the regulated industry
- The benefits and costs of regulation for consumers and regulated entities
- The reliability and quality of essential services
- The need for consistency across regulatory frameworks

GWW has fully acknowledged the significant disruption caused to customers due to delayed billing and system migration challenges, and the measures set out in the proposed enforceable undertaking demonstrate GWW's commitment to consumer protection and redress.

We consider it important that the Commission also considers the financial viability of GWW and the broader water sector. A well-functioning and resilient water industry depends on stable revenue streams to support operational and capital expenditure. Water businesses must be able to recover costs in a timely and predictable manner to maintain infrastructure, invest in necessary upgrades and continue to deliver reliable services to customers in a prudent and efficient manner.

The principle of intergenerational equity is also relevant. Regulatory decisions should ensure that short term relief for current customers does not lead to future bill shock and undermine the capacity of future customers to access reliable, affordable, and environmentally sustainable water services – in line with the Commission’s primary objective to promote the long term interests of Victorian consumers.

We support the proposed exception approval, noting that GWW will implement specific customer communication and compliance improvement measures. These steps will help maintain public confidence and trust in the water sector, and align with the Commission’s vision of fair and dependable essential services, today and tomorrow.

Thank you for the opportunity to provide feedback.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Jo Lim', with a stylized, flowing script.

Jo Lim
Chief Executive Officer