



City West Water™

City West Water Corporation

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29 January 2018

Ms Michelle Bryne
Senior Manager Strategic Communication
Essential Services Commission
Level 37, 2 Lonsdale Street
MELBOURNE VIC 3000

Dear Michelle,

RE: Submission on draft charter of consultation and regulatory practice

Thank you for the opportunity to provide feedback on the Essential Services Commission's draft charter of consultation and regulatory practice (draft charter).

As a water corporation providing regulated essential services, we have noted a significant uplift in the breadth, depth and timing of the water sectors' engagement with customers and community on service offerings, service standards and price. This uplift has clearly been assisted by the introduction of the PREMO framework and the guidance issued by the Commission as part of the 2018 Water Price Review. The new framework and guidance rightfully cement the central role of customers in business planning. Certainly we believe that our own engagement approach for our 2018 Water Price Submission has improved markedly compared to previous reviews and, as a result, our services provide significantly better customer value.

We note that the Commission regulates a diverse range of services. Given the expectations set by the Commission in its 2018 Water Price Review guidance and other sector-specific reviews, it is timely for the Commission to update its charter to consistently reflect contemporary principles and terminology across all its regulated sectors.

Having reviewed the draft charter and the corresponding consultation paper, we are supportive of both the principles-based approach proposed by the Commission and the five proposed engagement principles. Further, we support the 6 principles that set out the Commission's proposed approach to regulatory practice. We believe that the application of these principles can assist the Commission in promoting outcomes that are in the long term interest of consumers.

Thank you again for the opportunity to provide feedback. Should you have any queries please feel free to contact Richard Smith, our Business Planning and Regulation Manager on Ph 03 9313 8498 or email: Richard.Smith@citywestwater.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'David Ryan', written over a light blue circular stamp.

DAVID RYAN
Managing Director