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19th December 2023

Essential Services Commission
Level 8, 570 Bourke Street
Melbourne, VIC, 3000

Via email: water@esc.vic.gov.au

Dear Commissioner,

RE: Proposed amendments to the Water Industry Standards

Thank you for providing Central Highlands Water (CHW) the opportunity to provide feedback on Essential Services Commissions (Commission) draft decision on amendments to the Water Industry Standards with a proposed effective date of 1 March 2024.

CHW overall supports and welcomes the Commission's objective of monitoring our compliance with the Water Industry Standards. In particular, CHW is looking forward to participating in the Commission's upcoming engagement on developing a guideline for what constitutes "Material Impact" with other industry stakeholders. Without this guideline CHW is currently unable to understand the impacts to our business, the implementation timeframes and potential additional costs.

However, CHW recommend that the Commissions proposed implementation date of 1 March 2024 to be deferred until 1 July 2024 to ensure that the guideline is implemented and adopted appropriately. This additional time would also allow time for CHW to update our policies, procedures and educate required personnel on the new self reporting obligation and newly developed guideline. We would support interim self reporting measures remaining until this date.

We understand the Commission has an essential role in regulating the Water Industry and CHW, along with other Water Corporations, have several self reporting obligations including some which overlap with other regulators and authorities.

Whilst we appreciate the Commissions sentiment of not requiring CHW to self report something already being reported to another agency unless the Standards cover the same issue, we do recommend that the Commission re-considers some sections of the Standard are overly generalised and do significantly overlap other agencies.

CHW believes that the commission should be notified of the possible or actual material impact, however it may not be practicable to be informing multiple agency including the ESC while an incident is still unfolding and being dealt with by CHW teams.

CHW understands and appreciates the serious nature of family violence in our community and its effects on our customers. We take our family violence obligations seriously and appreciate the Commissions efforts in providing a clearer baseline in the draft decision for which CHW will strive to exceed. As such CHW agrees with the Commissions draft decision on clause 11 and anticipates no challenges or issues in implementing or complying with the proposed changes by 1 March 2024.

Yours sincerely,



Philippa O'Sullivan
General Manager Customer & Business Services