Comments on Draft Performance Reporting Framework

My apologies for the lateness of my submission. Please find below some comments I have on the Draft Performance Reporting Framework. Please note that these comments are my own personal comments and do not reflect the views of my company, SGS.

1. As noted on Page 3 of the Consultation Paper, I think it is extremely important that there is the called-for coordination between the reporting requirements of DSE, DHS, EPA and ESC. Needless repetition of reporting will only frustrate attempts to create an open and cooperative reporting system.

2. With regard to affordability issues, yes, I think that more debate needs to be undertaken with regard to the affordability of water. The first thing I would like to have noted is the discrepancy between the service charges and the water usage charges. I currently rent, so I only pay water usage charges, not the service charge. My quarterly water bill, for using, on average, 240 litres per day, is around $20.00. On this cost there is no incentive to save or conserve water.

It is appreciated that for a water authority it is the delivery/infrastructure costs that are the big expense items, but if you look at sustainability of the resource issues, having water conservation measures in place is extremely important, and at the moment there are no economic incentives to conserve, because the fixed infrastructure/delivery/disposal charges are high, but the variable water usage charges are low. The obvious problem here is that everyone needs water to survive and by increasing the cost of the water itself it tends to disadvantage the poor, as water is not a luxury item.

This is not an easy problem to fix, but it would be nice to think that a better balance could be struck between the fixed costs and the variable costs, that would help promote water conservation, but still deliver enough revenue to water authorities to maintain adequate services.

I think that this is the debate that has to be had.

3. With the proposed indicators:

For most water authorities that pipe and then treat sewage at their own sewage treatment plants, I would assume that the Volume of Sewage Delivered (Page 2) would match the Volume Sewage Treated (Page 3), particularly if the measurement is taken at the inflow point to each STP. If this is the case, reporting the same figure twice is probably not a big issue.

Under Water Network Reliablity and Efficiency, I would like to see a figure on the total number of bursts and leaks, rather than or as well as a figure on bursts and leaks per 100km of main. The reason is that authorities with spread out supplies may be advantaged or disadvantaged by this averaging

process, whereas the total number of bursts and leaks may give a better indication of overall maintenance and infrastructure status issues.

With the "time taken to rectify bursts and leaks" I think the total job duration should start from the time that the crew arrrives on site, not from when the notification occurred, because for some regional authorities a crew might have to travel 30-50km to reach a break, where for some urban authorities the distance might be only 5-10km. This could artifically inflate the rectification time, whereas the true measure of how good an authority is at restoring service is by measuring how long it takes them to rectify a problem once they reach the site of the problem. It might be difficult to measure accurately, but it may be worth measuring the average distance that maintenance crews have to travel to reach a main break. This may help authorities plan whether they need more maintenance depots or review call out procedures if the kilometres travelled to each break are excessive.

A similar philosophy applies to sewage breaks.

Thank you for the opportunity to comment.

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