



30 July 2010

**By email: [water@esc.vic.gov.au](mailto:water@esc.vic.gov.au)**

Mr Andrew Chow  
Director  
Local Government and Water  
Essential Services Commission  
Level 2, 35 Spring Street  
Melbourne VIC 3000

Dear Mr Chow,

**Re: Developing a hardship related guaranteed service level measure**

The Financial and Consumer Rights Council (**FCRC**) thanks the Essential Services Commission (**Commission**) for the opportunity to provide comment on the Commission's development of a hardship related Guaranteed Service Level (**GSL**), as detailed in the *Issues Paper*. The proposals detailed in the *Issues Paper* are fair and reasonable and we support them in their entirety.

One comment that we do make however, is that the coverage of the GSL extend to all water companies, and not just those listed in the *Issues Paper*. We believe that all regions should be subject to the GSL, with review after 12 months to refine and amend the GSL if necessary.

Again, we thank the ESC for the opportunity to provide comment. Should you have any questions regarding this submission, please contact Kristen Gobbo at the FCRC on (03) 9663 2000.

Yours sincerely

**Richard Foster**  
Chief Executive Officer

**Kristen Gobbo**  
Policy and Public Affairs Officer