

Our ref: 20/075/004-01  
Contact: Mark Williams  
Office: McLachlan Street, Horsham



**GWMWater**

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31 January 2013

Marcus Crudden  
Acting Director – Water  
Essential Services Commission  
Level 37, 2 Lonsdale Street  
MELBOURNE VIC 3000

Dear Mr Crudden

### **Submissions Specific to the Recreation Contribution Charge**

Since the public meeting where GWMWater presented Water Plan 3 on 28 November 2012, you have received three submissions specific to the proposed recreation contribution charge.

The recreation contribution charge is a concept that has had unanimous support through the GWMWater customer committee structure. On the basis of this support, the recreation contribution charge was included as part of Water Plan 3. We believe that the submissions received do not reflect the community view and are confused by other issues.

The views of Mr Herring are narrow in their application and only acknowledge its role in discounting the price of water supply to recreational lakes. It is further confused with service levels and more particularly water quality issues in Kaniva that have been previously the subject of community consultation.

The views of Mary Smith and the Horsham Rural City Council place an emphasis of equity of access to recreation water as much as the recreation contribution charge itself. In the municipality of Horsham, there is a need to clarify the future role of Green Lake and Toolondo; this will be undertaken as part of the upcoming review of the Wimmera Glenelg Bulk Entitlement order. The recreational amenity provided by the Horsham Weir Pool and Taylors Lake that are also within the Horsham municipality have been overlooked. Natimuk Lake has never been part of the regulated water system and whilst we do not discount the recreational and environmental amenity provided by the Lake their desire for a more secure water supply will need to be considered through the review of the Wimmera Glenelg bulk entitlement order.

Since completing the Wimmera Mallee Pipeline GWMWater has identified the inconsistencies of what has been considered recreation water in our system. Water that has formed an integral part of the headworks has provided

recreational amenity and the role of some of these structures changes under a pipeline system where the headwork network now plays a substantial role in meeting environmental obligations. The environment itself has also been a source of recreation water and its ability to do so enhance by the construction of the pipeline and the enhanced environment it has created.

The recreation contribution charge also provides a level of support to sporting clubs with significant benefits to those that still rely on the reticulated systems as a source of supply. This has generally been overlooked in the Horsham Rural City Council submission and we will be providing further information to Council on the benefit that has been overlooked in their submission.

We maintain that there is strong community support for the proposed recreation contribution charge. It is consistent with the liveability objectives of the WMPP that we committed to when we were vested with the responsibility for delivering the WMPP.

Should you require any further information to support your assessment of Water Plan 3 and the application of the proposed recreation contribution charge we would be happy to provide.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Mark Williams', written in a cursive style.

**Mark Williams**  
Managing Director

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31 January 2013

Peter Brown  
Chief Executive Officer  
Horsham Rural City Council  
PO Box 511  
HORSHAM VIC 3402

Dear Peter

### **2013-2018 Water Price Review – Submission on GWMWater Water Plan**

Thank you for your interest in the 2013-2018 Water Plan and the submission that was lodged with the ESC on the plan.

The Horsham Rural City Council submission raised a number of issues specific to the supply of water to recreation lakes, recreation facilities and the proposed recreation contribution charge. Outlined below are GWMWater observations about your submission that attempt to put the issues into the appropriate planning context.

#### ***Recreation Lakes***

In your submission to the ESC, a list of lakes and water bodies was provided that are presently supplied by the pipeline. All these lakes with the exception of Lake Marma were identified in the Wimmera Mallee Pipeline Project (WMPP) Interim Business Case as lakes and water bodies that traditionally received water via the channel network as part of the regulated water delivery system.

Through the WMPP planning processes, these lakes were identified by the community as priority community assets to be preserved for the recreational amenity provided to the community. The volume of water identified to maintain a top up supply to these lakes was identified to be 3,000 ML and the demands factored into the design of the pipeline.

Water supplied to these lakes previously attracted a charge of \$48 per ML under channel supply. GWMWater maintained this price during the period covered by Water Plan 2. When supply capability was restored, there was community concern about the affordability at this rate. The proposed discount to \$20 per ML with the differential to be met by the recreation contribution charge has been widely supported through the consultative processes of developing Water Plan 3. This differential represents approximately 25% of the money to be collected from the proposed recreation contribution charge.

The storages that were part of the headworks network before the construction of the WMPP (including Green Lake and Toolondo) were assumed to be retained as headworks storages. The only exception was Lake Batyo Catyo where it was known that this storage would no longer be required as part of the headworks system. It was also known at the time of preparing the Interim Business Case that the volume of water required for supply to Lake Batyo Catyo was too great to be incorporated into the pipeline design. The planning did assume however that Lake Batyo Catyo would be able to continue to harvest flows off the Richardson River. Under this scenario Lake Batyo Catyo would continue to receive a water supply but is more weather dependent on its ability to maintain a supply of water.

Natimuk Lake is not dissimilar to Lake Batyo Catyo only for the fact that it has never been part of the regulated water system. For Natimuk Lake to be supplied, it would command large volumes of water that are presently committed to the environment or consumptive uses that have been 'created' to facilitate the growth of the region. Natimuk Lake was not identified through the WMPP planning processes as a lake of recreational or environmental priority. The views on Natimuk Lake will however be fed into the processes for the review of the Wimmera Glenelg Bulk Entitlement Order that is to commence shortly.

The issues specific to Green Lake and Toolondo were not foreshadowed in the planning for the WMPP. The system now requires less storage capacity under pipeline operation than was required for the demands that were placed upon it when the channel system was in operation. The outcome of the review of headworks by the Future use of Reservoirs Committee was to be revisited and will be considered as part of the review of the Wimmera Glenelg Bulk Entitlement Order. The recreational amenity offered by these lakes is acknowledged. The role of these lakes in the water storage network will be reassessed as part of the review of the Bulk Entitlement Order.

Your submission does not acknowledge two other water bodies that provide substantial benefit to the Horsham Rural City Council and its ratepayers. The Horsham Weir Pool and Taylors Lake are other water bodies that provide substantial recreational amenity that are within the municipality. The ready access to lakes such as Green Lake, Taylors Lake and Natimuk Lake (when sufficiently full) has allowed the use of the Horsham Weir Pool to be restricted to more passive forms of recreation. When the pipeline was being completed and the drought had its most significant impact on water resources in the region Taylors Lake was the only water body in the region providing substantial recreational amenity.

Equity of access as well as price has been one of the more significant issues raised through the consultative processes of the Water Plan. The ratepayers of Horsham are well serviced with recreation water amenity from an access perspective. By virtue of this water being part of the environment or part of the headworks there is no charge associated with this water.

### ***Recreation Reservoirs and Sporting Clubs***

The council submission represents a view that the Horsham Rural City Council or broader community of Horsham will not benefit from the proposed discounting of water supplied to recreation water facilities due to the investment made in substitute water products.

GWMWater acknowledges and congratulates the Council on its achievements and GWMWater has been supportive of such initiatives. We do believe that there are more facilities that rely on the reticulated system for water supply that will benefit directly as a result of the discounted tariff and I will provide this information to you separately

The submission also overlooks the role of the Horsham Weir Pool as a source of supply to recreation and community assets in and around the town.

### ***Summary***

The WMPP is a project that was successful because of the strong community support for the need for the project. The outlying communities that have had to forgo farm dams felt strongly about retaining some water delivery capability that maintained some recreational amenity and basic environmental amenity. The 3,000 ML for recreation and the additional 1,000 ML that was allocated to the environment were an outcome of this process.

The role of Green Lake as a premier recreational lake in the region with significant environmental value is acknowledged. We are confident that this will be appropriately considered as part of the upcoming review of the Wimmera Glenelg Bulk Entitlement Order.

GWMWater would like to further develop a model for recreation lakes in consultation with local government that better reflects the differential source of water. This concept was broached when I met with you and other local government CEO's in late 2012.

The policy framework of the recreation contribution charge that has been developed for the 2013-2018 Water Plan is seen as being the most pragmatic way of ensuring that the 'liveability' objectives of the WMPP are achieved. This will enable GWMWater to meet the economic social and environmental aspirations of the region that it committed to as part of the WMPP by having a water supply system that can support existing consumptive water demands, the obligations that have been created for environment, water for growth and water for recreation.

The water storage and delivery network and how it operates will be reviewed as part of the upcoming Wimmera Glenelg Bulk Entitlement Order review. We encourage you to participate in this process and we will be advising of the consultative processes for the review in the next couple months.

Thank you for your interest in the 2013-2108 Water Plan and I look forward to working with local government more generally on refining the model for recreation water supply across the GWMWater service region.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Mark Williams', written over a horizontal line.

**Mark Williams**  
Managing Director

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31 January 2013

Mary Smith  
Secretary  
Water for Natimuk Lake Committee  
PO Box 36  
NATIMUK VIC 3409

Dear Mary

### **2013-2018 Water Price Review - Submission on GWMWater Water Plan**

Thank you for your interest in the 2013-2018 Water Plan and the submission that was lodged with the ESC on the plan.

The Wimmera Mallee Pipeline Project was the subject of a significant community consultative process with input from all regional stakeholders. During this consultative process, the communities that relied on the regulated water system as a source of recreation water registered their desire to retain access to recreation water. On the basis of the consultation undertaken, a list of lakes and water bodies of 'recreational significance' were identified and a 3,000 ML water allocation designed into the pipeline. Natimuk Lake was not included as part of the pipeline and is not part of the regulated water system.

The rainfall events of January 2011 resulted in the filling of most of the lakes and water bodies in the region that had been empty for many years. The recreation amenity that this has created has brought back some vibrancy to the region that has been accompanied by increased rates of visitation for recreation purposes. All these water bodies cannot however be supported by the regulated water system.

Your submission suggests that the ratepayers within municipality of the Horsham Rural City Council will be shouldering a disproportionate amount of the levy relative to the benefit. The communities that will be receiving water as part of the regulated water system will still be required to pay \$20 per ML for water and still have relatively modest access to recreation water. Toolondo and Green Lake are both officially considered part of the headworks system and their role in the system as assessed as part of the upcoming review of the Wimmera Glenelg Bulk Entitlement Order.

Within the municipality of Horsham there is also the Wimmera River weir pool and Taylors Lake that provide substantial recreational amenity.

GWMWater recently commenced dialogue with the municipalities that we service with a view to getting a blueprint for the model to be in place for recreation water across our service area. The objective of these discussions is to reach agreement on priority lakes that provide recreational amenity. This will also identify lakes that will be more reliant on weather events as a source of supply.

Only 25% of the proposed recreation contribution charge will be used to support the discounting of water supplied to recreation lakes. The remaining 75% is will be used to discount water supplied to recreational sporting grounds. This will benefit the Natimuk Showgrounds Reserve. We would also consider the Quantong community to be part of the broader Natimuk community of interest and the recreation contribution charge will also benefit the Quantong Recreation Reserve.

Since undertaking the Wimmera Mallee pipeline, recreation water has been the most topical issue we have had to consider. It has been the most significant issue raised by the community in the development of the Water Plan. Equity of access to recreation water has been as significant an issue as price. At this point in time your issues are more about access. These can only be considered as part of the upcoming review of the Wimmera Glenelg Bulk Entitlement Order review that is to be undertaken over the next eighteen months.

The proposed recreation contribution charge is aimed at providing a more equitable outcome for supplying and pricing of water to sporting clubs and recreation lakes that is more closely aligned to the objectives of the Wimmera Mallee Pipeline.

We welcome your feedback on the Water Plan and appreciate your views on the value of Natimuk Lake to the Natimuk community. GWMWater will continue to work with Horsham Rural City Council on issues specific to recreational water in the municipality and the issues specific to Natimuk Lake.

Yours sincerely



**Mark Williams**  
Managing Director

Our ref: 20/006/114: I2012/10449  
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31 January 2013

Mr John Herring  
11 Warwick Street  
KANIVA VIC 3419

Dear John

*Certified to best practice standards  
ISO 9001 / 14001 and AS/NZS 4801*

### **2013-2018 Water Price Review – Submission on GWMWater Water Plan**

Thank you for your interest and associated submission on the GWMWater 2013-2018 Water Plan.

Whilst I appreciate that the context of your submission centred upon the recreation contribution charge, the broader issue your submission raised was the service levels relative to price and the overall affordability of water. In reviewing your submission, I am aware that there has been a long standing history of objection specific to our service policies and the quality of the Kaniva water supply.

As you have indicated in your letter, Kaniva presently has an untreated water supply and as a consequence is declared a regulated water supply. GWMWater undertook a significant consultation program in Kaniva 10 years ago to ascertain the extent there was community support to upgrade the Kaniva water supply to a potable supply. The community was quite strong in their opposition to any proposal to upgrade to a portable water supply. There was an undertaking to revisit the community position on potable supply; the Water Quality Improvement Plan that supports the 2013-2018 Water Plan foreshadows our intention to reassess the community support for a water supply upgrade.

GWMWater maintains a policy of like price for like service and/or where there is a significant difference in the cost base that should be reflected in water prices. Kaniva attracts the same rate as all other groundwater towns where the water supply is not warranted to be potable. A copy of the proposed pricing as represented in the 2013-2018 Water Plan is included for your information.

Your letter suggests that the water you are receiving is compromised by galvanised pipes that service you. In Kaniva there were galvanised mains as part of the reticulation network but these have all since been replaced. The only galvanised pipework would therefore be restricted to the pipework serviced to you directly (main to meter). The GWMWater policy on galvanised services provides for the replacement of services with customers being required to meet

the first \$500 as part of its main to meter policy. This is a policy implemented in 1998 when the urban service connection policy was reviewed. This policy has been upheld by EWOV in determinations and no change has been proposed as part of the 2013-2018 Water Plan. I understand that subsequent to a process of inquiry your service was replaced in 2008. The other potential water quality impact for water service relates to your own internal plumbing and this is clearly the responsibility of the landowner.

In the absence of any issues caused by the existence of galvanised services, the aesthetic parameters of the water are generally reasonably good. The aesthetic parameters of the Kaniva water supply compared to the requirements of the regulations of the Safe Drinking Water Act are summarised below.

Parameter	Regulatory Standard	Kaniva (Average)
Turbidity	< 5 NTU	6 NTU #
EC	< 1,000	1532
Colour	< 15 HU	2

# Average is actually 4.3 with the 6 being caused by three outlier events of elevated turbidity.

The water would generally meet the microbiological standards as it is a closed system but as it is a regulated water supply we do not advise that the water be consumed. The 'hardness' of the water can cause premature scaling to appliances such as hot water services, kettles and dishwashers.

GWMWater is presently establishing a trial Point of Use system in Pimpinio for water quality. This is being developed as a potential template for smaller towns. It could however potentially be used in towns where the collective view is that a water quality upgrade is not necessary.

The timing of the establishment of a new round of consultation is likely to coincide with a more informed understanding of the outcome of the point of use trial.

In relation to the views on the proposed recreation contribution charge, you are only highlighting the potential benefit to recreation lakes. The recreation contribution charge will also benefit sporting clubs and the Showgrounds/Recreation Reserve, Bowling Club and Tennis Club will all potentially benefit from the recreation contribution charge in Kaniva.

Of the funds to be collected from the recreation contribution charge, only one quarter will be directed to supporting recreation lakes. The rest is to be directed to sporting clubs to assist with the cost of watering sporting reserves. The issues specific to the provision of recreational water have been as much about promoting the liveability of the Wimmera and Mallee region. This water includes the recreation water that has been secured for water that has historically relied

on supply from the regulated system as well as environmental water that has been realised by the construction of the pipeline systems.

The recreation contribution charge has been generally well supported throughout the consultative process of the Water Plan and I enclose a fact sheet that provides some more detail on the proposed recreation contribution charge.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Mark Williams', written in a cursive style.

**Mark Williams**  
Managing Director



### Recreation Water Contribution June 2012

11 McLachlan Street  
(PO Box 481)  
Horsham Victoria 3402

GWMWater is seeking to refine its pricing policy for recreation water as part of the development of its 2013-2018 Water Plan and is considering the introduction of a Recreation Water Contribution to recover some of the costs associated with supplying water to sporting and service clubs and nominated recreation lakes and weirs across the region.

The proposed Recreation Water Contribution is \$16.00 per customer with an \$8.00 discount applied to concession card holders. A customer is defined as each primary rural household meter and urban water connection.

If applied, GWMWater would raise \$400,000 from the introduction of the contribution which would allow:

- > the cost of water delivered to recreational lakes and weirs via the Wimmera Mallee Pipeline to be further reduced from the current discounted price of \$48 to \$20 per megalitre.
- > rural recreational and sporting clubs to collectively save \$26,000 per annum through volumetric rate discounts.
- > urban recreational and sporting clubs to collectively save \$88,000 per annum through volumetric rate discounts.

The proposed contribution has been the topic of significant discussion with our customer committees who support the release of this discussion paper for comment.

### BACKGROUND

A specific objective of the Wimmera Mallee Pipeline Project was to provide greater certainty for the provision of recreation water in the region.

The following recreation lakes/weir pools that previously received supply from the channel system now receive an annual 'top up' supply from the Wimmera Mallee Pipeline:

<b>Name</b>	<b>Management Authority</b>
Warracknabeal Weir Pool	Yarriambiack Shire Council
Marma Lake	Yarriambiack Shire Council
Brim Weir Pool	Yarriambiack Shire Council
Beulah Weir Pool	Yarriambiack Shire Council
Lake Lascelles	Yarriambiack Shire Council
Watchem Lake	Buloke Shire Council
Tchum Lake	Buloke Shire Council
Donald Park Lake	Buloke Shire Council
Wooroonook Lake	Buloke Shire Council
Green Lake (near Sea Lake)	Buloke Shire Council

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### **Recreation Lakes and Weirs**

Under GWMWater's 2011-13 Pricing Proposal, the current discounted volumetric rate for water supplied to recreation lakes is \$48.47 per ML, to be escalated on the same basis as domestic and stock price increases (2.5% per annum).

The cost of providing the 3,000 ML available to supply the nominated lakes and weirs each year (subject to resource availability) is made up of headworks storage and delivery costs. Water is generally delivered in low demand periods (May to September) to reduce operational costs.

The total annual cost to GWMWater of providing this service is \$358,000 which includes headworks storage and delivery costs and the maintenance of recreational facilities at headworks reservoirs.

The proposed contribution would be used to subsidise the already discounted volumetric rate for water supplied to the nominated lakes and weirs from \$48 ML to \$20 ML. The \$20 ML for water delivered would be charged directly to the Council or Committee of Management of the relevant lake or water body.

GWMWater believes that the discounted volumetric charge would ensure affordability for these organisations while still sending a price signal to promote the efficient use of the water resource.

### **Recreational and sporting clubs**

The possible introduction of the contribution has also been driven by feedback received on the sustainability of smaller rural sporting and service clubs from GWMWater's customer committees and the broader community. The proposed contribution would offset the cost of providing a discounted volume charge to 162 urban and 34 rural sporting and service clubs within the region, including recreation reserves and tennis, football, golf, racing, motor sports, bowling, shooting, boat and skiing, fishing, rowing, netball, hockey, softball, swimming, croquet, athletic, cycling, aero and gymnastic clubs

It is proposed that clubs serviced by the rural pipeline only attract the primary meter charge and discounted volumetric rate. No capacity charge would be applied, with the water allowances to supply these customers remaining with GWMWater. Only customers holding a tradeable water allowance would pay the capacity charge.

This approach is consistent with similar urban customers, where sporting and service clubs attract a concessional charge for a 20 mm service irrespective of the size of the water service. These customers pay the relevant volumetric rate for that town, with a 15% discount available for 'night watering'. This discount would remain in addition to the following volumetric rate discounts:

- > consumption up to 5 ML per annum - 40% discounted volumetric rate
- > consumption between 5 to 10 ML - 25% discounted volumetric rate
- > consumption greater than 10 ML would be charged at the full volumetric rate

Urban sporting clubs also receive a \$260 per annum subsidy through a State Revenue Office rebate. Rural sporting clubs are now eligible for this rebate if connected to a pipeline network.

### **Feedback sought**

GWMWater is now seeking feedback from customers and other key stakeholders on the introduction of the proposed Recreation Water Contribution.

All submissions must be received by **Friday, 10 August 2012** in writing at the office of GWMWater by:

**Mail** PO Box 481, Horsham Vic 3402

**Email** [info@gwmwater.org.au](mailto:info@gwmwater.org.au)

**Fax** 03 5381 9881

For more information on recreational water contribution, please contact our Customer Contact Centre on 1300 659 961 during business hours.

25 June 2012

## 5.2 Urban Water Tariffs

During Water Plan 2, GWMWater completed the rebalancing of residential and non-residential tariffs. Table 7 summarises the proposed prices to apply to standard urban services in 2012/13 through until 2017/18 for both residential and non-residential water products.

Table 7 - Summary of Urban Water Tariffs (Real, \$/l/13)

	Service Avail Charge		Volumetric	
	2012/13	2017/18	2012/13	2017/18
Drinking Water Supply (Full Treatment)	\$414.48	\$469.39	\$1.5444	\$1.7490
Drinking Water Supply (Disinfected only)	\$392.59	\$444.61	\$1.4723	\$1.6675
Regulated Supply - Pipeline/Channel	\$366.84	\$415.46	\$1.4055	\$1.5917
Regulated Supply - Groundwater	\$364.74	\$413.06	\$0.8650	\$0.9797
Regulated Supply - Eastern Grampians	\$366.84	\$415.46	\$1.1377	\$1.2884
Development Rate (Growth Towns) *	\$190.87	\$216.17	Na	Na
Concessional (All Supplies) #	\$272.33	\$308.41	Variable	Variable
Fire Service (All Supplies)	\$418.49	\$473.93	Na	Na

\* Growth Towns include Horsham, Stawell, Ararat, Halls Gap and Great Western

# Concessional approved sporting clubs also have access to a 15% night watering discount.

## 5.3 Urban Wastewater Tariffs

GWMWater has rebalanced all tariffs on the principle of like-price for like-service, with the exception of the wastewater charge which has been adjusted to remove the non-residential volumetric charge. A corresponding adjustment has been made to the minor trade waste charge for non-residential customers regulated by the Trade Waste By-Law.

Table 8 - Summary of Urban Wastewater Prices (Real, \$/l/13)

Customer Group	Charge		Minor Trade Waste	
	2012/13	2017/18	2012/13	2017/18
Residential	\$433.26	\$490.68	Na	Na
Non Residential	\$433.26	\$490.68	\$146.12	\$306.37
Non Residential Volumetric kL #	\$0.6717	\$0	Na	Na
Development Rate (Growth Towns)	\$199.28	\$225.69	Na	Na
Concessional (All Supplies)	\$259.04	\$293.36	\$146.12	\$306.37

# Minor trade waste charges increased in year one to offset removal of non-residential volumetric charges.

The details of the urban water and wastewater tariffs are provided in Appendix 5.

**Group 2 - Drinking Water (partial treatment)**

Common tariff for towns supplied with disinfected only drinking water, regardless of supply source:

Walpeup	Manangatang*	Quambatook*	Sea Lake #
Nullawil			

# Sea Lake has been programmed to receive water quality upgrades in 2018 of Water Plan 3

\* Low cost treatment solutions being investigated, with the price outcomes to be assessed based on water quality outcomes.

**Group 3 - Regulated Supplies (no treatment)**

Common tariff for all towns supplied with Regulated water via channel/WMP or Northern Mallee Pipeline:

Antwerp	Marnoo	Pimpinio	Culgoa
Berriwillock	Nandaly	Speed	Lascelles
Dooen	Chillingollah	Tarranyurk	Patchewollock
Glenorchy	Brim *	Tempy	Chinkapook
Beulah*	Minyip #	Waitchie	Yaapeet
Rupanyup #	Lalbert *	Donald #	Wycheproof #
Jung *	Watchem	Ultima	Woomelang*

\* Low cost treatment solutions presently being considered.

# GWMWater has received funds to advance water treatment and these towns will progress to the drinking water (potable) tariff.

**Group 4 - Eastern Grampians Pipeline (no treatment)**

Common tariff for Eastern Grampians pipeline towns supplied with regulated water.

Buangor	Elmhurst	Wickliffe	Moyston
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**Group 5 - Groundwater (no treatment)**

A common tariff applies to all groundwater towns receiving a Regulated water supply:

Apsley	Kaniva	Murrayville	Westmere
Cowangie	Kiata	Harrow	Miram
Goroke	Lillimur	Serviceton	Streatham