In relation to the ESC, Review of Water Performance Report Indicators – Staff Discussion Paper, April 2012, Central Highlands Region Water Corporation offers the following comments and questions:

Proposed new categories and indicators

• CRS 1 - Website mystery shopper

The proposed approach maybe subjective in its interpretation of the criteria range, unless formal and fixed guidelines are structured. Of note also is what's important to a customer may vary depending on location and their customer needs.

• CRS 3 - NPS or CES

Do not support net promoter score as it stands but will support CES measurement and an alignment for ease of doing business with CHW.

• CRS 4 - Customer satisfaction survey Support consistent approach focusing on improvement rather than compliant reduction as a measurement.

PRO 2 – Cost to serve (\$ per customer)

Costs to include need to be clearly defined as CHW is not currently capturing the cost of some of these activities at the proposed level e.g. meter reading, information statements, dispatch.

• SEC 1 – Supply Volume available to meet demand volume (ML)

Is the purpose to report on the volume of treated water actually in storage vs consumption or the total volume of water in storage? If the later then this statistic is fundamentally flawed because it does not take account of any expected inflow. Eg it is meaningless to compare the volume in storage at, say Blackwood with what is in store at Ballarat - these systems have vastly different streamflow magnitude and reliability.

The statistic may have been useful at the height of the drought when system augmentations had not been completed - but not now. Maybe might be useful for clear water storage

• SEC 2 - Demand vs sustainable yield

Why sustainable? Let's use the definition of yield ie the average annual demand which can be supplied at the agreed level of service. Adding "sustainable" is confusing an already complex parameter.

It may be better to report on the agreed levels of service but be aware that there is a vast range of LOS across Victoria - MW uses litre per person per day, CHW use frequency of restrictions and of critical storage levels.

Demand - the consumption for the past year is not the average annual demand Yield is a long term parameter and it possible to report on a system with demand greater than yield but not in imminent danger of running out of water. Reporting as proposed is an oversimplification and could lead to incorrect conclusions being drawn. If used then other aspects such as triggers for commencing augmentation would also need to be included and explained.

Proposed Indicator Modification

• UPP 1 – Instalment Plans (Page 38)

We have a query on the inclusion of "concession" to the split. This needs to be further defined as this would create cross-over between the categories. For example a customer on a pension on an instalment plan is either a domestic or non-domestic customer. Would this customer be counted solely as "concession" or counted twice as a "concession" and either a domestic or non-domestic customer as well. Proposed categories could be: Domestic (no concession) Domestic (concession) Non-domestic (concession) Non-domestic (no concession)

• **Table 4.2 Page 42 (BED 4 Trade Waste Customers)** There needs to be clear definition of the "industrial" and "commercial" categories.

Questions

• CRR7 - Volume of Trade Waste

Is this to only apply to all known trade waste customers (ie. those with individual formal consents / agreements) or is it intended that we identify and quantify volumes associated with "Deemed" Trade Waste Customers?

"Deemed" Trade Waste Customers are a new category, under the ESC's TW Code, and include Hairdressers, Florists and others. There will be a generic Trade Waste Consent covering these customers, but they are not subject to individual agreements.

• SEC3 - Independent supply systems

Need to check that this does not require splitting one existing system if it is supplied by groundwater and surface water. CHW would want to continue reporting on its 15 water supply systems.

• In relation to water supply interruptions - If a mobile potable water tanker is connected to the reticulation system to supply customers or to the individual customers premises, does this negate an interruption or minimise interruption time (water off, water on)? Note - This method can be used in either planned or unplanned interruptions.

Regards

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