

Marcus Crudden,

E.S.C.

Marcus,

You will be aware that Barwon Water has already corresponded with you on the subject of proposed performance indicators based on preliminary output of the working group (ref my email 25 May 2004). Barwon Water also attended the public forum on this subject and made a number of comments, which I understand were recorded.

Given the pressure of time, please accept the following as Barwon Water's response to the discussion paper.

Population Served

The issue of how to deal with seasonal variations in population applying to coastal holiday resort towns like Lorne and Apollo Bay remains. The population of these towns can vary by as much as 10:1 between summer and winter, and use of permanent population figures only would result in distorted indicators of, for example, average consumption per person. Barwon Water suggests the way to deal with this is to use an estimate of population for each reported quarter and an average of the four quarters to give an average annual population.

Time taken to rectify bursts and leaks

Total time taken to repair blockage or spill

Exclusion of time involved in follow-up works associated with reinstatement of nature strips etc. is supported.

Call connect time to operator

Barwon Water remains concerned that this indicator may discriminate against those water businesses who have IVR systems and provide a convenient single telephone number for receiving all calls from customers. The advantages to customers of a common number versus call connect time to an operator needs further consideration.

Volume of sewage spilt from ERSs and pumping stations

Barwon Water does not have flowmeters fitted to constructed overflows. Installation of flowmeters would require allocation of substantial funds that may be better applied elsewhere. The need for measurement of flows from such structures is a matter that will be further discussed with the EPA, being the relevant technical regulator. In the first regulatory period this indicator should be made optional for RUWAs.

CO2 emissions

The reason for inclusion of this indicator is unclear. CO2 emissions cannot be measured directly, and would need to be calculated as a theoretical measure. Consequently the lack of robustness or auditability of the measure is a concern and it therefore should be omitted from the ESC's indicators. Barwon Water would however be happy to provide this information directly to the relevant technical regulator, along with other information of a similar specialised technical nature regularly reported to technical regulators.

Regards,

Carl Bicknell
Executive Manager Water Systems
Tel. 5226 9202