

Input to the Essential Services Commission on the Draft Decision for Goulburn-Murray Water Price Submission 2024-2028.

“We are an independent regulator that promotes the long-term interests of Victorian consumers with respect to the price, quality and reliability of essential services.”

The ill-informed decision by ESC to approve the Diverters Tariff Strategy (DTS) which began operating in 2016 was wrong. There was no consultation of the heavily affected small customer group of Unregulated Domestic and Stock (UDS) customers who received a bill 22% higher in 2015/16 than the previous year.

The error of the DTS approval in 2016 has since perpetuated in subsequent rubber stamp approvals by ESC.

The untrue statement of Charmaine Quick claiming we are still paying the same as we did in 2016 is refuted. Managing Director Quick stated that the fees for UDS at \$349 currently and was the same in 2015/16. The real figures are 2015/16 \$282 which was a 22% increase from the previous year. The current bill for UDS is \$430. For the MD of GMW to make such a statement in a public forum sitting next to a Commissioner of ESC has one wondering who ESC are listening to. It is very obvious that ESC are not listening to the consumer.

The relationship between ESC and GMW is seen by small customers as being a very strong relationship.

Consultation between ESC and small water customers is very one sided (BIAS) as ESC do not seek clarification, hold any workshops with customers or participate in correspondence unless one lodges a complaint.

It is apparent that ESC don't understand what is being approved.

ESC are only taking the word of GMW as to what is being performed to provide so called “services”.

ESC make a strong point of sustainable and efficient operation to ensure the viability of GMW. This emphasis overshadows the consideration that should be given to decisions affecting GMW's smallest customers.

Even though a lot of people have written to GMW and ESC complaining of unfair prices for small customers, ESC do not demonstrate or acknowledge having absorbed the concerns. Commissioner Billings seemed surprised at some comments from the floor disputing GMW claims regarding fees for small customers. Perhaps the consumer concerns are not being distributed as they should be.

The presentation by ESC in Shepparton on April 23 2024 was intriguing in that if three consumers had not attended, the meeting would have comprised of eight ESC people, five GMW people and three Rural Water Services Committee members. The meeting was also odd in that the presentation by the Managing Director did not announce what GMW were doing about the one point that ESC rejected in the pricing submission.

GMW have been provided with many opportunities to justify the fees being charged to UDS and cannot. Fees charged are based heavily on assumptions, deeming and averaging. This flies in the face of what is expected by customer groups and regulations. ESC are not investigating either service provider claims or consumer concerns. ESC investigations are “high level”, “rely on lack of data from GMW” and are “constrained by time”, all resulting in ill-informed decisions.

Cameron and Jan Reid.