



By Email: water@esc.vic.gov.au

Ms Natalia Southern
Director Regulation – Water
Essential Services Commission
Level 2 35 Spring Street
MELBOURNE VIC 3000

Dear Natalia,

RE: Draft Performance Reporting Framework – Metropolitan and Regional Businesses

Western Water has reviewed the Consultation paper No 2 on the proposed framework and offer the following comments for your consideration.

Generally speaking Western Water is concerned that the suite of indicators are a significant enhancement on those currently reported by the metropolitan businesses to the ESC. The imposition of more detailed reporting, requiring collection from 1 July 2004, will mean that Western Water will not be able to report the data, of all the performance indicators in the short term. Earlier commitments made to water businesses that the framework would not lead to significant changes to current reporting practices appear to have been overlooked in this case. Further the provision of this level of data for the regional businesses in particular will be resource intensive in terms of people and systems changes, which has not been anticipated in the Water Plan.

One way forward may be to adopt a smaller set of the indicators based on those currently in use and ask water businesses to comply with the full set of indicators within the regulatory period.

Further a number of indicators relate to specific groups of customers (eg developers and solicitors/conveyancers) without complimentary measures for other groups (such as concession cardholders and rebate claimants).

Detailed comments on each indicator are attached.

Western Water looks forward to working with the ESC during this reform process and thank you for the opportunity to provide comment on the Draft Performance Reporting Framework.

Yours faithfully

A handwritten signature in black ink, appearing to read "John Wilkinson".

John Wilkinson
CHIEF EXECUTIVE

**ESSENTIAL SERVICES COMMISSION
DRAFT PERFORMANCE REPORTING FRAMEWORK
FEEDBACK/COMMENTS**

Draft Performance Indicators

Performance Indicator	Comments
Definition of a Customer	The definition of a customer should include all customers that receive a service from the water business which includes those with serviced properties that are able to be serviced from the water business and who receive a bill for service. It is not valid to exclude customers who receive an account but choose not to connect as the billing costs are incurred nevertheless.
Sewerage Customers (p. 1)	See "Definition of a Customer" above.
Bursts and Leaks (p. 4)	Will require internal systems to be enhanced to record as Priority 1, 2 and 3
Time taken to rectify bursts and leaks (p.4)	"required level of service" means main is fully charged, needs to be defined.
Customers receiving 1, 2, 3, 4, 5, & 6+ water supply interruptions in year (p. 5)	Suggest a 12 month rolling timeframe would provide more valuable data.
Leakage (p. 6)	Define "unavoidable". % unaccounted measure should read "in accordance with WASA methodology".
Total time taken to repair blockage / spill (Hr) (p. 6)	Need to define that this is until blockage is cleared, and does not include cleanup ?
Customers receiving 1, 2, 3, 4+ sewer supply interruptions in year (p. 6)	Suggest a 12 month rolling timeframe would provide more valuable data.
Sewer spills from reticulation and branch sewers (p.7)	Confusion of terms, suggest once defined we should stick with the term " spill " example of suggested changes : <ol style="list-style-type: none"> 1) For the purpose of this indicator, a priority one or two sewer spill is any escape of sewage from the sewerage system, excluding: 2) –a spill to a sensitive receiving environment 3) – a spill from a sewer that is 300mm diameter or greater 4) Priority 2 spill means any minor escape of sewage from the sewerage system. (the rest of this clause is unnecessary and further confusing) Note the word 'contain' now is all about our appropriate response to any spills, and is quite clear. (The word surcharge must not be used)
Unaccounted Water	Need to ensure consistent treatment of water used by the business itself
Call connect time to Operator (sec) (p.7)	Suggest 'hangups' occurring over 10 secs should be recorded.
Complaints (p.9)	Suggest that : <ul style="list-style-type: none"> • A complaint is a written or verbal expression of dissatisfaction about an action, proposed action or failure to act by the water business, its employees or contractors. Complaints from separate customers arising from the same cause count as separate complaints. ... be the definition applied to all complaints in the first instance. Each complaint can then have its respective conditions.

	<p>Categories where “expresses dissatisfaction” is noted as the criteria is too subjective.</p> <p>The definition above provides some direction and clarity.</p>
Water Quality Complaints (p.9)	<p>First contact advising of a water quality issue was traditionally classed as a complaint. Require confirmation that this is no longer the case.</p>
Sewer Odour Complaints (p.9)	<p>First contact advising of a sewer odour issue was traditionally classed as a complaint.</p> <p>Require confirmation that this is no longer the case.</p>
Property Development Agreements. (p.9)	<p>Suggest removal. This is a commercial decision between the customer and the water business.</p> <p>If remaining, requires clarification on definition of ‘prepared works & construction’. Also, 45 days is inappropriate where feasibility assessments may be required.</p>
Information Statement turned around in 3 days. (p.9)	<p>Far too detailed a measure on a task that is no more important than many others.</p> <p>These other similarly procedural tasks are correctly not suggested as requiring measuring under this regime.</p> <p>This creates a risk that businesses will drive activities to meet this particular requirement at the expense of other equally important activities. For example, Concessions, Notices of Sale, Tenancy changes, etc. If the measure is proceeded with then turn around time should be 10 working days</p>
Effluent Reuse (p10)	<p>Strongly recommend the terms “effluent reuse” and “sewerage effluent reused” be replaced with the term “recycled water” in accordance with the section heading and current best practice.</p> <p>Split needs to be separated into volumes of each class of recycled water produced (ie A,B,C or D in accordance with current EPA Guidelines), plus total volume.</p> <p>Volumes of water recycled of each class, and % of water recycled of each class, plus totals.</p> <p>Volumes recycled should be collected in accordance with its appropriate uses, ie:</p> <ul style="list-style-type: none"> ○ Agricultural ○ Recreation & Municipal ○ Urban residential ○ Industrial ○ Approved environmental ○ Licenced discharges (stream & ocean) ○ Other (including losses)* <p>Volumes of recycled water substituted for other sources should be shown as:</p> <ul style="list-style-type: none"> ○ Potable substitution ○ Ground water substitution ○ Raw water substitution <p>Also, recommend that the number of plants be shown in the baseline explanatory data as operating at the end of the reporting period in total, and for each class. In addition, numbers of recycled water customers should be also shown in this explanatory section.</p>

	<p>* Suggest that volumes of recycled water produced is based on volumes of sewage treated as often, whilst direct users of recycled water are metered, transfers from the sewerage treatment plant to winter storages are often not metered (particularly for lagoon based plants). This information will be useful as an indicator of recycled water losses through biosolids removal, net evaporation, plant and system losses etc, and should not pose an additional burden on data collection. Definition of % recycled water is required and should be calculated as (Inflow MLs less Licenced discharges MLs)/Inflows MLs</p>
Volumes of Sewer spills and Minor Trade Waste customers are not measured nor can they be with any real accuracy.	Suggest the term "Estimate" prefix all requests to measure these elements volumetrically. Ideally, the reporting template will address the "how" for consistent reporting across the industry.
Biosolids reuse is accurately measurable for any dewatered material. The dry weight volume of Biosolids accumulating in lagoons is an educated guess at best.	Suggest the term "Estimate" prefix all requests to measure the mass weight. Again, the reporting template will address the "how" for consistent reporting across the industry.
CO ₂ equivalent emissions are currently measured through National Pollution Inventory (NPI)/EPA for processes that exceed a certain tonnage. We currently have one plant/process out of many (in excess of 14) that exceeds the NPI reporting requirement and we do not capture nor calculate vehicles, office buildings etc.	A great deal of effort (human resource and dollars) will be required to capture, calculate and report with any accuracy in the medium term. Acceleration of these mechanisms to report by July 2004 will only exacerbate the effort.
Trade Waste priority parameters are not exhaustively identified in relation to the sensitivities of each of the seven wastewater treatment plants.	A good deal of effort (human resource) will be required in addition to and during the overhaul the existing Trade Waste Strategy to capture, calculate and report with any accuracy for individual plants.
Standards for Drinking Water Quality must be reported to DHS. This additional statistic is of little importance.	The value of a percentage of population (connections or heads?) receiving water not meeting the standards is of dubious relevance to RUWA as opposed to the Metro's. Should the ESC insist on this requirement, any template supplied must lay down a calculation to ensure interpretation is sound
Volume of sewage spilt from ERS's and SPS's	Measurement of such spills is a significant task, suggest both measured and estimated volumes spilt be used in the % calculation, should have little impact on the resolution of the final figure.