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The following information has been submitted from the ESCOSA:

**Project Title** Subsequent determination to vary 2013-17 price determination for minor and intermediate retailers  
**Date** Jun 09, 2017  
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**Is your submission confidential?** No (My submission is not confidential)

The City of Tea Tree Gully (CTTG) does not oppose the proposal to extend the operation of the June 2013 to 30 June 2017 price determination to 30 June 2018. The guidelines set out in the Water Initiative Pricing Principles have merit and are important to ensure essential services are operated sustainably into the future for the water entity, the community and CTTG.

**Option to write your submission Or any comments**

In relation to reducing the prescriptive wording about ongoing reporting requirements, CTTG see the benefits of the current Compliance Report as it lays out the various clauses in the Water Industry Act that are monitored by ESCOSA for compliance. The Price Monitoring Report and Financial and Operational Performance Report can be resource consuming to input accurately the required data. However, this can be overcome with time as water entities are encouraged to innovate and utilise technology to develop data capture processes. Capturing the right data is important to water entities as it is an integral part of its continuous improvement system. The benefit to the community begins to be realised as water entities are encouraged to set KPIs and strive to continuously improve processes to achieve industry benchmarks. Many water entities generally operate as a monopoly due to the mode of service delivery with limited alternative options available to the community. Performance benchmarking becomes important for measurement and comparison. It has been noted that only pricing data for individual water entities was published in the 15/16 Performance Report. The report contains a combined graph showing customer service across all minor to intermediate entities, but this does not allow cross examination of service related issues for each water entity. The price of the service should reflect the level of service provided by the water entity to the customer. The level of service would differ for different communities due to differing expectations. Therefore, issues such as water quality related issues, planned and unplanned service interruptions, mains breaks, chokes and blockages should be published to provide transparent interpretation of the price of service.

There is some ambiguity regarding what is meant by "reduce the prescriptive wording about ongoing reporting requirements." Therefore it is difficult for CTTG to determine what benefit there would be to reducing the prescriptive wording. As stated above, CTTG do not oppose the reporting requirements of ESCOSA in the annual reports but would like to see an added benefit by providing performance data for each water entity. In addition, any reduction in unnecessary 'red tape' with no benefit to Local Government and the community it services is accepted by CTTG.

Our preferred format is Acrobat pdf, Maximum attachments size is 3MB

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