

## Submission on the ESCOSA draft documents

### Reference: Robusto Investments Pty Ltd; Drinking Water Draft Regulatory Determination

We moved to Mount Compass in the April of 2016 having bought the property in September 2015.

Our original water contract was with Hillrise Investments (which charged SA Water Rates). This was then taken over by Robusto Investments on 8 June 2016 with a totally new pricing structure which included a new \$■■■ per quarter Infrastructure Network Charge.

After attending the meeting with ESCOSA we want to make the following points

1. The discrepancy in the number of customers appears to be due to Robusto not including 2 non-residential customers. If these are the Golf Course and Sand Mine then they should also be liable for “wear” and “tear” of the system. Same as the water tanker which is being used to minimise dust on ■■■ development on George Frances Drive. I.e. residents should not be paying for the water used by Robusta for commercial purposes.
2. Very large discrepancy in the estimated average bills between Draft determination and Robusta submission. Still cannot comprehend how Robusta has submitted 4 pricing proposals that still do not comply with retailers price determination and ESCOSA has had to do a separate determination.
3. If Robusto do not agree with the Draft Determination they can appeal. Given that there is more than a \$2000 per year per customer discrepancy we think that they would appeal the decision. If this is the case then we would still not know how much we will be charged.
4. In the current draft Robusta has pricing flexibility. It appears to be the norm that there is a supply/distribution charge and a usage/consumption charge. We feel that this is the best and most fair system i.e. if you use more you pay more and if you use less you pay less. Concerned that as Robusta has pricing flexibility the easiest method for them would be to charge everyone the same. This would allow Robusta to recover the maximum revenue (without exceeding it) and not have to worry about reading the water meters. **I therefore strongly recommend that the determination includes a supply charge, a 3 tier usage charge plus quarterly meter readings.**

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