

18 October 2013

Mr Stuart Peevor
Manager Pricing and Access
Essential Services Commission of South Australia
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Dear Stuart

Draft Rule 1 – Dispute Resolution for Excluded Services

Thank you for the opportunity to comment on the above-mentioned draft rule released for public consultation on 19 September 2013. SA Water has supported and assisted with the development of the regulatory framework to date and appreciates the consultative approach.

As you are aware, SA Water has in place dispute resolution practices that were formally approved by the Essential Services Commission of South Australia (ESCOSA) on 13 August 2013. SA Water supports the clarity that this draft rule would provide to both SA Water and its customers and seeks to achieve this without incurring additional cost impacts for customers. It is SA Water's intention to follow its usual processes when managing excluded services, pricing complaints and disputes.

As part of its support for an efficient and effective dispute resolution process SA Water considers that Draft Rule 1 would benefit from the addressing of the following points:

1. A light-handed, low-cost regulatory approach which:
 - a. allows ESCOSA the opportunity to review the disputed price and determine whether it meets the requirements set out in section 5.1.1 of the Final Determination; and
 - b. refers pricing decisions back to SA Water in the event that ESCOSA determines that the disputed price has been set outside of the requirements so that SA Water can amend accordingly.
2. Information requirements should be relevant to the level of information required to determine compliance with section 5.1.1 requirements;
3. A timeframe of 20 business days should be attributed to the provision of initial information.

SA Water would support ESCOSA in considering the costs and impacts of regulation and implementing the most light-handed, cost-effective processes wherever possible.

Yours sincerely



John Ringham
CHIEF EXECUTIVE

