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Essential Services Commissioner,

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Dear Commissioner,

I am grateful for the opportunity to once again contact you regarding my concerns about GMW pricing structure, particularly as it impacts Unregulated Domestic and Stock water users.

Firstly I would like to comment on the irregular circumstances concerning my initial correspondence with you relating to GMW charges.

Following my initial complaints to GMW regarding my bill I responded to an invitation from GMW to take part in meetings chaired by GMW staff. They initiated these meetings in response to the large number of complaints received from Unregulated Domestic and Stock users, mainly I believe from the Upper Ovens catchment area. It was during this initial meeting that I became aware of a large group of other US&D water users all expressing mainly the same concerns that I had, I also became aware for the first time of the completely controlling nature of GMW, as it soon became obvious this meeting hadn't been called to facilitate the free flow of information, but rather a tightly controlled environment where GMW staff could set a very limited agenda and lecture us customers about the great services they were providing for us for much of the meeting, after we were given a brief opportunity to introduce ourselves and outline our concerns.

We were all mostly expressing the same complaints.

That our water bills had inflated well above the CPI since GMW assuming control, and that most of the Service charges appearing on our accounts bore no relationship with our reality. I.e, there were several service charges but none of us were receiving any services, other than the bill, and unwanted glossy mail outs with nothing inside relating to UD&S water users.

As every consumer at the meeting clearly stated, they had NO onground service from GMW and it seemed these rapidly inflating sums had become an addition to justify charging more for the \$6.75 which is the actual costing of the water we are entitled to.

Next GMW co-opted some of this group of complainants into what they called a Focus Group, which became quite active taking part in online meetings with GMW during the height of the Covid outbreak and lock downs. We also conducted our own private meetings where we workshopped ideas in an attempt to deal with the GMW intransience, as they sounded more and more like a broken record, dismissing our concerns and merely parroting the miss information they choose to distribute within the unwanted, expensive glossy mail outs.

We have all become extremely frustrated and exhausted by realising we had little to no chance of focussing GMW onto our concerns that they are charging us for services where no service is provided, to

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the point now where many of our group are no longer bothering to try, and I'm not sure how many of the group are now even contributing to this opportunity to have some meaningful input into our pricing structure.

Would you consider me cynical to suggest wearing us down with blunt intransience was an aim of GMW to silence criticism from the beginning? To me and most in our group its quite obvious that they are achieving this desired outcome.

During these meetings GMW regularly advised us to express our complaints to you, the ESC.

So it was (is) extremely frustrating to receive a response to my last input to the ESC informing me that the pricing structure of that period was fixed as all the legislation was set in place, that nothing could be done.

I ask, what would prompt GMW to advise us to write to you when there was zero chance of any positive outcome, other than to further frustrate their customers attempting to shine light on the irregularities in their prices?

This is typical of the belligerent, non caring, unrealistic attitude GMW have been displaying since I first started raising my concerns with them in 2019.

Realising GMW justify their pricing submissions to the ESC with the exact same erroneous figures and supposed 'services' they provide, it's little wonder they have been getting rubber stamped in the past.

And to me it's no surprise that despite all the interactions and protestations over the past 4 years from many people, not just those from the Upper Ovens catchment, that GMW would choose to present the same discredited justifications for the way they charge Unregulated Domestic & stick users.

1/ To maintain water flows.

2/ To monitor non compliance

3/ To monitor rosters.

There is nothing GMW can do for me even if they wanted to.

My land straddles 2 water courses in the upper reaches of the Barwidgee catchment, high above any other properties, and a very long way above any GMW infrastructure.

To my knowledge there has never been a GMW staff member on my property or within the local catchment I take my water from since its formation in 1989. In 1983 a member of the previous water administrators walked with me to what was then a fresh spring high in the gully above my isolated property. This spring has now deteriorated into a muddy deer wallow due to government policies encouraging the population growth of feral animals, but let's not go there today.

I still draw my water from the exact same location, because it's the only to date regular above ground water in that catchment. I've walked all over it since, and still found nothing else.

GMW justify their charges to me by claiming they're including me in water rosters that assure me of a regular supply and they prevent water theft, with promises to deliver reliable clean water. (Well documented in another submission I'm also a contributor to).

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The only rostering in my mountain valley is between myself and a neighbour, as we share the supply through a 20mm plastic pipe running down the valley, just as it does under the ground, according to what's provided by seasonal rains.

We are each licensed to take 2ml of water from the deer wallow.

Even if I were to take all the water travelling down the 20mm pipe, I would still fall well short of my allowed 2ml. But there are two licences so the most water I can receive is less than 50% of my licences volume.

It is simply physically impossible for this 20mm plastic pipe to deliver 2ml of water to our properties even if the supply was sufficient. Note we have systems in place to maintain environmental flows untouched by either of us.

GMW charge both properties the same amount for services not provided on top of license fees, newly implemented water registry fees and a new 15 year licence fee, all on top of our annual licence fee.

GMW charge both properties the same amount for taking a small amount of unpotable water available some days of the year, depending on seasonal rainfall and our ability to hike to the water, resolve the problem and get the water flowing again

My neighbour fell off his horse and had a broken pelvis so I had to do the job myself recently

I'm an aged pensioner and not as nimble as I once was. The walk took 7 hours, and I paid a friend \$45 an hour to walk with me for safety reasons.

I've complained to GMW many times about the unreasonable service charges they apply to my bill in light of it's impossible for them to provide me the services they claim to be giving, along with the fact they don't even know the location of my pipe.

Over recent years GMW have provided me with three sets of different coordinates supposedly detailing the location of my 'Service Point'.

None within a kilometre of the actual water source, and one location even within an entirely different water catchment.

It's more than frustrating and surely is illegal.

GMW regularly say they are committed to providing excellent service.

They say a lot of things much of which bears little resemblance with reality.

GMW recently responded to my latest complaint by stating that I had agreed, (with a person I've never spoken to) to use 'historical data' for the location of my 'Service Point'

I have and never would, agree to this as there IS NO HISTORICAL DATA, everything they have provided me with has been make believe, based on GMW guesswork.

Exactly the same as the accounts they send me.

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Is there any wonder I am refusing to give them any more money since first engaging with them over this issue, until a legal determination is handed down regarding GMW charging fees where no service is provided.

Particularly as I now know how many other Unregulated Domestic & Stock users are as tired as I am of 'taking it on the chin'.

This is my Domestic water supply, the only water I have other than rain I collect from my roof.

I need it for flushing my toilet, washing my clothes, filling a tank for watering a small green area around my home to try and keep bushfires away, and to have on standby for direct firefighting purposes, which also is a local government regulation.

GMW expect me to pay a similar amount for muddy irregular water that I provide ALL the infrastructure and maintenance for, that others within township boundaries pay for treated drinking water provided at the front gate .

Do you Commissioner think this is realistic and sustainable?

Demographics of rural populations have changed considerably over the past hundred or so years, and also since i moved onto my property in 1978.

Another inconsistent issue is the nature of Domestic and Stock. In the old days most rural land holders farmed the land and filled farm dams and troughs so they could run a few stock which they sold for profit.

I've been told outright by GMW staff that if I have excess vegetables in my garden, I can't sell them at the local farmers market.

If I grow a few oyster mushrooms in my shed it seems I can't sell them.

I know of many on Domestic and Stock licenses renting out rooms for extra income.

In no way wishing to undermine their lifestyle, but I ask the Commissioner:

In this day and age is it really fair and reasonable that I should be told what is an allowable use of my water, particularly in circumstances where it's actually impossible for my system to divert even 50% of my water allowance?

I know of many others in similar circumstances.

So I and others are pointing out to the ESC that the vast amount of the fees GMW are demanding we pay are for supposed services GMW have never and have no intention providing for Unregulated Domestic & Stock water users.

GMW have actually acknowledged that our fees are in fact subsidising other water users, but that our class of user is too small to be billed as a separate group.

Well thanks GMW for state of the art 2023 technology.

Would the Commissioner please point out to GMW what a nonsense this statement is? That a computer programme would resolve this issue in a heartbeat.

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They know who we are.

So taking all of the above into consideration, that most of the fees demanded by GMW of landholders located out of the main catchments where GMW actually do provide some services, are taken under false pretences.

That despite the protests of many Unregulated D&S water users over the past few years GMW have still blithely repeated in their current submission to the ESC most of the same erroneous claims of past years.

GMW it seems still consider it 'business as usual' despite being informed hundreds of times, privately and publicly, in meetings and in the media by at least one 'Focus Group' they established.

For us IT'S NOT BUSINESS AS USUAL.

GMW are still prepared to demand payment for services never rendered, that they have no intention of ever providing, and that they acknowledge often are impossible to provide, simply because they find it 'too difficult' to separate US&D water users into a uniquely charged group. Just as they do for other separate groups of water users.

I hereby request the commission to make a ruling regarding the legality or not of GMW charging Unregulated Domestic And Stock water users service fees for services never provided.

I would also like to know the commissions views on the fairness of GMW telling me what I can use my water for in light of the fact that I can only receive a small percentage of my allocation.

As a footnote I hasten to add, I don't know anyone asking for more water.

Nobody is more aware of not only our changing social structures and expectations but also our rapidly changing and volatile physical environment than people living remotely within forested areas.

It's important that pricing structures for what are for us very essential services bear some relationship with what we receive.

Thank you for receiving my personal submission,

Regards,

Christopher Maud

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