

Friday, 15 December 2023

Dear Commissioner, Essential Services Commission,

I am an unregulated domestic and stock water user in the Goulburn Murray Water system.

I have held my 2ML licence for about 20 years. I provide all infrastructure, maintenance and management of the water. It is used for household – ie sanitation, drinking, watering vegetables, retaining a green curtailment for bushfire and maintaining a pool, also to be used for bushfire protection. If we are in a seasonal dry sequence eg the millennium drought we have less water and manage accordingly. The creek associated with our take off point is ephemeral so has limited effect on any other watercourse.

I would like to submit that GMW currently charge, and have been for at least the past 5 years, for services that they have never and have no intention of providing, for unregulated domestic and stock water users.

They charge:

Customer fee - \$130: I assume this is to send our bill out once a year, and check it's paid, seems excessive.

Surface Water Licence

Service Point Unmetered @\$145: There is no service, GMW don't know where it is and they haven't installed or maintained anything and have no process to do this nor intention.

Access Fee – (related to the service point) @\$83: Are we paying for GMW to access our point when we show them where it is? We access water from a natural spring, not a pipe or channel and again, GMW contribute nothing.

Resource Management Fee - @ \$3.23 per ML: For me that is \$6.46 This is great if it's what I think it is for and we should probably pay more although I note that the gravity irrigators don't seem to pay anything in this category and it seems to me that the damming of our water resources and using rivers for channels arguably requires the most resource management

Water Registration Entitlement Fee – \$14.44: Another bureaucratic fee that is closer to what the customer fee should be.

My concern is centred upon the Service Point fee (\$145 per annum) as the absence of delivery or intent to deliver makes this an illegal charge and potentially referable to the ACCC under the *Competition and Consumer Act 2010 (CTH)*.

GMW recognise that our fees are subsidising other water users but claim that our class of user is too small to be billed as a separate group. I'm not an IT expert but even an excel spreadsheet could differentiate even one anomalous customer. The size of the group is irrelevant to a correct and legal fee structure.

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I urge you in this assessment of fee structure to consider a fair and equitable fee for unregulated domestic and stock users reflecting the actual service provided,

Yours faithfully

Sarah Nicholas