

By email: water@esc.vic.gov.au

19th June04

Mr Marcus Crudden
Project Manager, Performance Reporting
Essential Services Commission
Level 2, 35 Spring St
Melbourne 3000

Dear Marcus

RE: Draft Performance Reporting Framework Submission

Portland Coast Water wishes to thank the Commission for the opportunity to make comment on the Draft Performance Reporting Framework recently released to the Victorian water businesses. Our comments follow:

Definitions

Population Serviced

Under the indicator, *population serviced*, the Authority understands that the Commission requires the permanent population of particular towns to be reported. However, one of the towns serviced by the Authority has a large tourist population during summer months, swelling the town's population by 800 to 900%. Because of the significant effect of this population variation, PCW would request that the peak population also be an indicator so as to adequately illustrate the reasons behind particular infrastructure investments designed to cater for peak loading on our systems.

Non Prepared Works for Developers

PCW uses the town planning application process through local councils to inform developers of the requirement to satisfy a number of conditions before consent is granted to the issue of a statement of compliance. As a consequence PCW does not require developers to enter into an agreement with the Authority for non-prepared works, and consequently does not feel that this measure is relevant.

Ability to Report on all indicators from 1 July 2004

PCW can report upon all factors requested, apart from the following:

- Customers receiving 1, 2,3,4,5, and 6+ water supply interruptions in year.
- Customers receiving more than 1, 2,3, and 4+ sewer blockages in year.
- CO₂ equivalent emissions (Tonnes)

There are two issues surrounding the parameters which cannot be recorded from 1 July 2004. They are;

- Current inadequacies in Portland Coast Water's IT systems. It is expected that the roll out of these new IT systems will take up to twelve months to complete and fully integrate into the functioning of the business.
- Integration of particular parameters within larger strategic projects. PCW is currently developing an ecological footprint measure capable of illustrating our impact on the environment and intend to use this tool to measure progress toward a more sustainable future. Consequently, PCW is extremely cognizant of the requirement to set up the CO₂ measurement tool in an analytically rigorous fashion, and as a consequence will not be able to immediately report on this measure.

Due to the above two points, PCW will not be able to report on the full set of performance criteria until 1st July 2005.

If you have any queries or wish to discuss any of these comments please do not hesitate to contact me.

Yours faithfully

Owen Phillis
CHIEF EXECUTIVE OFFICER