

Our reference: A29580954

Your reference:

Enquiries to: Denis Musaefendic

10 September 2023

Level 8, 570 Bourke Street

Melbourne

VIC 3000

Dear Commission and Water team,

Re: Submission to Commission's draft Guideline on self-reporting non-compliance with the Water Industry Standard

We are pleased to provide a submission in response to feedback on the draft Guideline on self-reporting non-compliance with the Water Industry Standard (WIS).

We strongly support the intent of the WIS review and guidelines to protect interests and wellbeing of Victorian water customers with a focus on preventing instances of Family Violence and more transparent communication with the Commission.

Our key point of feedback is that there are no clear definitions for interpreting the meaning of 'material, potential and widespread' impacts. This may result in each water corporation reporting differently and potentially over or under reporting depending on their risk appetite.

Given the above point, we intend to develop and share with the Commission an internal decision-making framework over the coming months which will be the basis of our decision to make the 'Initial Report'.

The industry workshop held by the Commission on Tuesday 3<sup>rd</sup> August to discuss and clarify aspects of the draft Guidelines Reporting was very beneficial and we support the common discussion that the 'Initial 2-3 day Report' be viewed as a preliminary 'Alert' of an event that is being investigated. The focus in this early stage to also be on customer safety and remediation with a 'Substantiative report' to be made as soon as practical and within a reasonable timeframe for the Commission to be informed after investigations are complete.

We support the format of the Excel based draft template for making the substantiative final report given that the excel format will allow the Commission to analyse reports and identify potential hot spots that may need improvement.

In this light we look forward to utilising this process, learning from the findings and improving sector wide processes to further strengthen compliance and the protection of customers.

Please do not hesitate to contact us if you would like to discuss any aspects of our submission.

Yours sincerely,



Laura Kendall

General Manager Customer, Community and Strategy