

11/01/2017

Essential Services Commission

Level 37/2 Lonsdale Street

Melbourne Vic 3000

Re MW 2016 tariff Patterson Lakes

This submission is regarding MW Action plan at the bottom of page 7 of the tariff submission where MW set out a response should multiple prolonged BGA blooms occur.

Firstly let me say that my submission already forwarded still stands, I want the bore to run, and like the 75% of residents am prepared to pay for the service. **The bore flushing must continue.**

Any reference to stopping the bore concerns me.

Therefore I have a concern about a small part of MW tariff proposal regarding outbreaks of BGA at the bottom of page 7.

MW has set out an inappropriate response for an issue, providing MW run the bore that should not exist i.e. multiple outbreaks of BGA...

1. MW would wait for multiple BGA blooms within a single summer. MW hold a bore license for 400 mega litres of water per year, currently they are using 253 mega litres. It would appear to me that instead of waiting for multiple BGA blooms it would be more appropriate to increase the bore water flushing to 2 Mega litres per day, a 30% increase, immediately any concerning level of BGA is detected. MW could do this without any downside impact.
2. MW response to BGA blooms is to stop the bore flushing. To stop the flush would only facilitate the growth and spread of BGA. The bore flushing over a four to five year period has proven to be an effective means of controlling BGA. The bore flushing is the only tool available and shown in trials to be extremely effective. Under no circumstances can I envisage any advantage in stopping the bore flushing even in the highly unlikely event of multiple outbreaks of BGA being evident in the lakes.
3. MW state that in the event of multiple BGA blooms the bore would be stopped and they would conduct a review into the benefits of bore flushing and control of BGA. This has been done over the last five years and ongoing, with results that the bore flushing of the lake has proven to significant improvement in water quality and control of BGA.
4. MW does not include any plan to start the bore once stopped either in the specific summer or any subsequent summers.

The underlying message I get from this part of the tariff application is MW appears not to have learnt anything from five years of bore flushing trials and a mindset somewhere deep in the past and want to turn back the clock in a never ending challenge to the benefits of bore flushing. In the three years of trials and another year of bore flushing and the poll on the residents for the tariff we have moved well beyond any review point.

Consultation.

In the scenario where MW would review and decide if the bore had an effect on the BGA and the possible outcome of stopping the bore, there is no consultation with the residents prior to stopping the bore flushing. This scenario and whole situation has not been discussed or conveyed to the lake residents. In order to start the bore a poll was taken and 75% of the residents agreed to pay the tariff if MW wants to stop it the same process should be followed i.e. A poll where 75% agree to stop the bore, followed by a submission to the ESC to stop the bore and tariff.

Main concern.

I am concerned that by having the multiple out breaks of BGA and stopping the bore scenario in the bore tariff application MW in fact have by passed the due process and therefore have prior approval to stop the bore without further consultation with the residents and ESC approval.

Why is this passage in the tariff application?

MW appears to be creating a problem that simply should not exist with an action that should not be taken i.e. stopping the bore flushing.

My main concern with this passage about stopping the bore is by leaving it in the tariff application it could be misinterpreted or miss used to stop the bore at some time in the future, is opened ended about staring it again and the review process.

I put it to the ESC and MW this whole passage is simple wrong in every possible way.

Moving forward with tariff approval.

The bore flushing must continue, in expressing my concerns it is not my intention to hinder the tariff application process. In order to move forward with the tariff approval and alleviate my concerns I request that

1. In the ESC approval of the tariff it includes a statement to the effect that any implied or otherwise prior consent be ruled out and due process must be followed to stop the bore and tariff i.e. consultation with residents, submission to the ESC and submissions from the resident on the proposal to stop the bore and tariff.
2. I would like to see the ESC suggest or recommend the option of increasing the bore flushing volume with the first sign of BGA and the bore flushing not stopped.

I assume that the scenario about multiple BGA blooms and action is simply a misconceived and innocent inclusion in the tariff application with unintended consequences and therefore I cannot envisage any objection from MW to the above.

Have a great day

Graham Tonta