



BUSSELTON WATER

Our ref : D19/3709 & 4674
Your ref :
Enquiries : Chris Vigus

PO Box 57
Busselton WA 6280
Tel 61 (8) 9781 0500
Fax 61 (8) 9754 1075
admin@busseltonwater.wa.gov.au
busseltonwater.wa.gov.au

17 May 2019

ABN 79 306 761 595

Ms Caroline Coutts-Kleijer
Economic Regulation Authority
PO Box 8469
Perth BC WA 6849
publicsubmissions@erawa.com.au

Dear Caroline

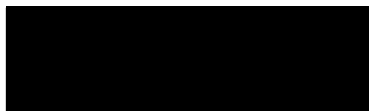
Re: **WATER LICENCE REVIEW 2019**

Thank you for the opportunity to provide a submission to the above review. Busselton Water has reviewed the document and offers the following comments:

- The many proposed administrative changes are accepted. They predominantly improve sentence clarity or align water licence text with electricity licence text.
- Removal of references to Hardship Policy from the licence is accepted.
- We acknowledge ERA's reasoning related to ERA review of "by agreement" contracts. Busselton Water has no objection to the proposal.
- We note that Schedule 2 performance standards (e.g. minimum head 15m, maximum head 100m, minimum flow 20 l/min) are to be interpreted as:
 - "design" standards to guide the delivery and operation of "works" (assets);
 - not performance standards for service levels provided to individual customers.

Busselton Water has no objection to the proposed changes to Schedule 2 and 3, however clarity on this subject is vital to water licencing.

Yours faithfully,



Chris Elliott
Managing Director

