

File References: GAWAT1

Assistant Director, Licensing
Economic Regulation Authority
PO Box 8469
Perth WA 6849

21 July 20011

Dear Sir/Madam,

RE: PROPOSED AMMENDMENTS TO OPERATING LICENSE No32

References:

A. #4699186-v1A dated 10 June 2011.

We are in receipt of your proposed amendments to Water Corporation operating licence No32. The propose improved performance measures, detemining service standards for minimum flow for farmlands, measuring pressure and flow are noted and Council is supportive of this move. However, there is considerable discussion on how this may affect the Shire of Moora (being on an aquifer supply) and that the proposed minimum flow indicates a lesser level of supply, whilst the minimum flow measures will be linked to a customer satisfaction not a water deliver factor.

We would like further explanation on the change in current minimum flow and proposed flow. The policy indicates a considerable reduction as it states "over a 24 hour period 11.2 litres/hectare/day and 3kL per occupied house." to "3kL/day per service" and "over a 24 hour period 5.6 litres/hectare/day and 1.8kL per occupied house to "1.8kL/day/service". Therefore a farm with a dwelling will drop to 1.8kL/day per service? Please confirm that we have interpreted this correctly.

We have concerns that the proposed minimum flow measures will move to a measure of complaints not measure actual services. The key outcome of the Water Corporation is the delivery of adequate water to consumers; therefore the measure should reflect this. The proposed measurement is moving towards a measure of customer satisfaction and is more applicable in a customer service charter measurement, than in the operational delivery of the core infrastructure services, water to the consumer.

We would like further information on how the Shire of Moora may be affected as the provision of water, is a critical infrastructure and service to our communities that if not provided will impact directly on our economic, environmental and social sustainability.

We do not support the proposed amendment at this time.

Thank you for the opportunity to make comment and if I can be of any other assistance please do not hesitate to contact me.

Yours faithfully



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