

HUNTER WATER CORPORATION

Our Ref: HW2016-522/4.001

ABN 46 228 513 446 PO Box 5171 HRMC NSW 2310 36 Honeysuckle Drive Newcastle NSW 2300

30 October 2025

Mr Mike Smart
Deputy Tribunal Member
Independent Pricing and Regulatory Tribunal
PO Box K35
HAYMARKET NSW 1240

Dear Mr Smart,

RE: Updated guideline for scheme-specific reviews of wholesale water prices

Hunter Water thanks IPART for the opportunity to comment on the proposed changes to procedural aspects of its guideline for scheme-specific reviews of wholesale water prices. We agree it has been a dynamic period for the water industry since the original guideline was published in 2018. It is timely and appropriate to review the document for currency and clarity.

Hunter Water supports IPART's proposed changes, specifically:

- The ability to defer or adjourn a review process where the information provided by parties is insufficient or where external expert advice is required. Hunter Water considers the proposed four-week period to be a reasonable timeframe for IPART to obtain the necessary information, while still ensuring the review proceeds in a timely manner.
- Updated references to legislation and regulations.

Hunter Water suggests that IPART also considers introducing an additional procedural requirement for scheme-specific reviews, requiring the party initiating the review to provide advance notice to the counterparty. Written notification of intent within a set timeframe (e.g., two business days) would allow for final resolution attempts between parties before escalation. This approach would help discourage ambit claims and ensure that only genuine disputes that cannot be resolved directly between the parties are escalated to IPART. The counterparty should also receive a copy of the review request form submitted to IPART to support timely preparation and information sharing.

Currently, the guideline does not require such notification, meaning the counterparty may only become aware of a request once contacted by IPART. Including this requirement would enhance transparency, encourage early engagement and collaboration, and support a more efficient and well-informed review process, benefiting all participants.

Hunter Water

Yours sincerely,