

7 August 2019



Mr Ashley Harbutt
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Dear Mr Harbutt,

Ref Small-scale networks inquiry

I understand General Manager City Services, Tony Lines and Water Resources Coordinator, Glynn Rickets met with Peter Lim and yourself on 1st August 2019. I would like to thank you for attending our office and presenting on a range of regulatory options towards developing a proportionate and responsive regulatory framework. The City of Marion encourages regulatory reviews that ensure consumer protection.

Our preference is for Option 4: Trust and verify approach. We support the harmonisation of regulatory instruments and the reduction of reporting to demonstrate compliance. Moving towards the trust and verification approach will deliver this outcome

In regards to specifics we would like to encourage ESCOSA to further investigate the need for actual metering for billing on small scale networks. The economics of billing small volumes of water do not always justify the costs of installing meters, meter reading, calibration and administration costs around invoicing. A fixed rate including service charge and consumption, based on comparative analysis, to be agreed by ESCOSA, may be a more cost effective method of encouraging alternative water supplies to potable water.

We would also encourage ESCOSA notify the alternative water sector of your intent and timing as you to move towards auditing as the primary verification method.

Yours sincerely

A handwritten signature in black ink, appearing to read "Adrian Skull".

Adrian Skull
Chief Executive Officer

The City of Marion acknowledges it is part of Kaurna land and recognises the Kaurna people as the traditional and continuing custodians of the land.