

ESCOSA Questions:

VTA model

- Are the reduced reporting requirements for trusted licensees appropriate?

Yes, Playford Council supports the proposed VTA model as a licenced small scale retailer.

- Are guidelines on materiality required?

Playford Council supports the guideline concepts / drivers to support the best outcomes for both the customers and licenced small scale retailers.

- Are the proposed checks and balances – assurance statement, audits and compliance – appropriate?

Playford Council support the proposed checks and balances identified in the VTA model around trust, retailers accountability and the associated compliance verification.

As annual compliance reporting with licencing stakeholders can be onerous and a little repetitive, any improvements to the proposed annual returns as identified under the proposed VTA model is welcomed.

- What information should be reported on in the annual performance reports produced by the Commission?

The information Playford Council suggest could be provided by the commission in an annual performance report include:

- Small scale retailers acknowledged for working with customers
- Small scale retailers having a competent professional and reliable operation
- Acknowledgement for an Small scale affordable product
- Direct targeted feedback to service provider
- Open transparency on ESCOSA verification

Harmonisation

- Should the Commission undertake harmonisation? **Definitely yes**

Council supports ESCOSA acknowledging small scale competent water retailer operations that provide a reliable service which meet customer satisfaction.

- How important is it that the timing of harmonisation aligns with the implementation of the VTA model? **Probably not crucial and could be a staged approach, however, as the harmonisation framework aligns with the VTA model, from a reporting perspective it would make sense that the streamlined approach was implemented at the same time with any new endorsed compliance reporting requirement.**

- Relevant issues/examples?

Playford Council also undertakes annual reporting with the Office Technical Regulator (OTR), Council would like to suggest ESCOSA considered this reporting requirement when reviewing the suggested harmonisation approach.

EWOSA membership

- Do you support the proposed role of EWOSA? [Yes](#)
- If not, what approach would you prefer? [N/A](#)

Kind regards



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