

Question	Response
Do stakeholders have any fundamental concerns with the proposed regulatory framework outlined, noting that its proposed implementation is discussed in subsequent chapters?	The LGA is supportive of the proposed implementation of a Verified Trust & Accountability Model.
Is the assessment process for categorising licensees appropriate? If not, why not, and how might it be improved?	The proposed assessment process for determining competent operation seems reasonable. Where possible, existing process to satisfy legislative requirements (in addition to the Commission’s regulatory framework) should be used to provide evidence of competent operation, to avoid duplication.
Should the Commission publish results of its assessments, as proposed by maintaining a list of licensees that do not demonstrate competent operation to the Commission’s satisfaction?	If a list is published, consideration should be given to providing adequate transparency so that customers have information about how the assessments are made and where/why the shortfall has occurred. This may also help Licensees address any queries from customers.
Are the reduced reporting requirements for Category A licensees appropriate? If not, what should reporting requirements look like?	The reduced reporting obligations outlined in Section 3.5 are reasonable. To assist in reporting, the development of a standard reporting return, and clear definitions of “any material change to operation” would help assist Councils to provide the correct information to the Commission.
Are guidelines on materiality required? If so, what might they cover and why?	Guidelines on materiality are required to help define material change. The Guidelines could include guidance to help the Entity determine what constitutes a material change and how this needs to be reported. This will help reduce over or under reporting of material changes as a small change may be of significance to a licensee but of no interest to the Commission, and vice versa.
Are the proposed checks and balances - assurance statement, audits and compliance -appropriate?	It is important to note that the proposed requirement for immediate reporting of service issues, as specified in section 3.5.2 of the Draft Enquiry Report, is already required by the existing incident reporting mechanisms that are regulatory requirements of the EPA, SA Health and the Office of the Technical Regulator. If the Commission does not have any immediate role in the reporting of these incidents, it is suggested that it could use the existing incident reporting framework of other Regulators, to reduce the burden on Licensees. The statement of assurance and audit requirements seem appropriate.
What information should be reported in annual performance reports? For each piece of information, who should report this information, the Commission or licensees, and why?	Reporting performance to Customers is useful to give confidence that systems are operated in a responsible manner. It is unclear how much information is required by customers and this needs further exploration.

<p>Should the Commission undertake harmonisation? If not, why not?</p>	<p>The concept of harmonisation is supported as it will make it easier for Licensees to meet their obligations across a range of different services, provided that it does not materially increase the regulatory burden on any single industry, and that any risk is appropriately mitigated.</p>
<p>If harmonisation is undertaken, how important is it that the timing for the implementation of any outcomes from Harmonisation align with the implementation of the VTA model?</p>	<p>Based on the information provided in the Draft Enquiry report, it does not seem that the timing is critical.</p>
<p>Do you support the proposed role of EWOSA as outlined in this chapter? If so, please provide the reasons for this view. If not, why not? What approach would you prefer and why would that provide a better outcome?</p>	<p>The proposed role of EWOSA is supported if it helps to provide better certainty that Licensees can remain in Category A and if it will reduce the regulatory burden. However, this change may create confusion for Rate Payers in local Government who are used to using existing complaint processes for other services and will require customer education. This will need to be clearly communicated to avoid duplication.</p>

Kind regards,

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