



Application Form for the Issue of a Water Licence

By the Essential Services Commission of SA under the Water Industry Act

May 2020

Enquiries concerning this form should be addressed to:

Essential Services Commission
GPO Box 2605
Adelaide SA 5001

Telephone: (08) 8463 4444

Freecall: 1800 633 592 (SA and mobiles only)

E-mail: licensing@escosa.sa.gov.au

Web: www.escosa.sa.gov.au

Table of contents

- Glossary of terms iii
- Information for applicants before filling out this form 1
 - Purpose of this form 1
 - Basis for this form..... 1
 - Use of this form and applicant’s responsibility 1
 - Prior reading..... 1
 - Licence conditions 1
 - Variation of licence conditions 1
- 2
- 2
- 2
- 3
- 3
- 3
- 3
- 1 The Applicant..... 4
 - 1.1 Identity of applicant 4
 - 1.2 Legal identity of applicant 4
 - 1.3 Address and Contact Details of applicant 4
 - 1.4 Contact Person on behalf of applicant..... 4
 - 1.5 Contact person for licence fees 5
- 2 The Licence..... 6
 - 2.1 A detailed description of the retail services for which a licence is sought..... 6
 - 2.2 Date from which Licence is sought..... 6
- 3 Suitability of Applicant to Hold a Licence..... 7
 - 3.1 Standard of honesty and integrity shown by applicant..... 7
 - 3.2 Standard of honesty and integrity shown by officers and major shareholders (if relevant) of the applicant. 7
 - 3.3 Names and addresses of the officers of applicant 8
 - 3.4 Names and addresses of major shareholders of applicant (not relevant for local council applicants)..... 8
 - 3.5 Details of the group members (not relevant for local council applicants)..... 9
 - 3.6 Additional information..... 9
 - 3.7 Financial resources available to the applicant 10
 - 3.8 Human resources available to the applicant 10
 - 3.9 Technical resources available to the applicant 11
 - 3.10 Contracts 11
 - 3.11 Suitable and appropriate infrastructure 12
 - 3.12 Risk management 12
 - 3.13 Licences held by the applicant in other Australian jurisdictions 13
 - 3.14 Previous unsuccessful licence applications in other Australian jurisdictions..... 13
 - 3.15 Licences held by associates of the applicant 13
 - 3.16 Compliance program 13

3.17 Additional information.....	14
4 Factors specified in the Essential Services Commission Act 2002.....	15
5 Application Fees	15
6 Declaration.....	16

Glossary of terms

Commission	Essential Services Commission, established under the Essential Services Commission Act 2002
ESC Act	Essential Services Commission Act 2002
Treasurer	Treasurer for the South Australian Government
Regulator	Technical Regulator

Information for applicants before filling out this form

Purpose of this form

This form is to be completed by persons making an application to the Essential Services Commission of South Australia (the **Commission**) for the issue of a licence to provide a retail service (or undertake any other activity for which a licence is required by the regulations) in the water industry in South Australia.

The Commission may consider joint applications from two or more persons who wish to hold a licence jointly. Persons making joint applications must ensure that each of the applicants completes a separate application form together with a covering letter explaining that the application is for a licence to be jointly held.

Basis for this form

Section 19(1) of the Water Industry Act 2012 (the **Act**) provides that an application for the issue of a licence must be made to the Commission in a form approved by the Commission. This is the form approved by the Commission.

Use of this form and applicant's responsibility

For the purpose of this application form, a reference to the term "Officer" include the applicant's directors and secretary, and/or other persons who make or participate in making decisions that affect a substantial part of the business of the applicant (e.g. Chief Executive Officer, Chief Financial Officer, General Manager etc.).

Applicants should list the information requested in the spaces provided in this form and enclose additional information when required. Applicants must take all reasonable steps to ensure the information provided in the application form is complete, true and correct and are required to make a declaration to that effect. Failure to disclose information or misrepresent any matter relevant to such information may result in a licence not being issued or in the suspension or cancellation of a licence at a later time.

Applicants are responsible for providing the Commission with current, accurate and relevant information. This will ensure that the application is processed promptly and without delay. All applications are assessed on a case-by-case basis. If insufficient information is provided with an application, the Commission will request additional information to be submitted before the application is considered further. This may cause delays in the assessment of the application.

Prior reading

It is essential that licence applicants read the Commission's Water Bulletin – "*Licensing Arrangements for the Water Industry*" before they fill out this form. This Bulletin is available on the Commission's website www.escosa.sa.gov.au under water/licensing. Applicants should also familiarise themselves with the regulatory obligations set out in the Act and the Water Retail Code that will apply to entities that provide retail services.

Licence conditions

Section 25 of the Act requires the Commission to impose certain conditions in licences. The Commission strongly recommends that applicants review these mandatory conditions. Applicants must be familiar with the relevant conditions and be confident that they can comply with the conditions. The Commission will have regard to the scale and nature of the operations undertaken by an applicant in imposing these conditions and will be available to consult with an applicant in this regard.

Variation of licence conditions

As part of the Commission's licensing function, it has the power to vary (or add to) conditions that are imposed on a licence it has issued. Specifically, under section 28 of the Act, the Commission has the power to vary a licence at any time, subject to statutory procedural requirements, including providing a licensee with reasonable notice of a proposed variation and allowing it the opportunity to make representations on that variation.

There is a broad range of factors that might be potential ‘triggers’ for the Commission to consider varying a licence, or adding new conditions. These include factors both external and internal to a licensee, and may include (without limitation):

- ▶ material changes in market operations, outcomes or structures;
- ▶ changes to applicable national or State legislation, rules or policy;
- ▶ the findings of a formal inquiry undertaken by the Commission;
- ▶ substantive changes to operations which would have a genuine connection to or impact on the operations authorised under a licence;
- ▶ an application by a licensee to vary its licence (for example, to add or remove retail operations); and
- ▶ evidence of upgrades or material changes to a licensee’s business or operational practices relating to operations authorised under a licence.

In considering a potential licence variation, the Commission must consider the factors specified in section 6 of the Essential Services Commission Act 2002 (which sets out the Commission’s primary statutory objective and other relevant considerations), the objects of the Act (as set out in section 3 of that Act). It will also be informed by any information submitted by a licensee to which the variation may apply, through public consultation and by engagement with regulatory agencies involved in the electricity supply industry.

Consultation and Confidentiality

The Commission will consult with relevant government, industry and consumer groups in the conduct of its licensing functions through a public consultation process. Consequently, applications and/or supporting information will be made available on the Commission’s website and in hard copy from the Commission’s office for this purpose.

If applicants believe that they are providing confidential information when completing this form they should write “this information is confidential” after any such information. It is the applicant’s responsibility to ensure this is clearly highlighted on the form. Applicants should also provide a ‘non-confidential’ version of the form capable of publication on the Commission’s website.

The Commission will use information supplied in applications and in support of applications in accordance with the requirements of Part 5 of the Essential Services Commission Act 2002. Applicants claiming confidentiality are encouraged to familiarise themselves with Part 5. Applicants should note that the Commission may be required to disclose confidential information in some circumstances.

How to lodge an application

Applicants should send their completed application form in electronically (preferred) or in writing.

Electronically to: licensing@escosa.sa.gov.au

In writing to: Essential Services Commission of SA
GPO Box 2605
Adelaide SA 5001

Application fee

Applicants must also enclose an application fee¹ (set by the Treasurer) with their application. This fee must be received by the Commission in cleared funds before it can commence assessing an application.

¹ Available at <https://www.escosa.sa.gov.au/industry/water/licensing/licence-fees>

Annual licence fee

Holding a licence incurs an annual licence fee. The licence fees² are set by the Treasurer, however, are collected by the Commission. At annual intervals, the Commission, on behalf of the Department of Treasury and Finance, will send to each licensee an invoice for the relevant annual licence fee. Licence fees are to be paid on receipt of an invoice via one of the payment options set out in the invoice.

A licence cannot be issued until the first annual licence fee has been paid.

² Available at <https://www.escosa.sa.gov.au/industry/water/licensing/licence-fees>

The Applicant

Applicants must answer all questions in this section.

1.1 Identity of applicant

State the full name of the applicant. The applicant should be the person/entity that will be providing a retail service (e.g. retail or distribution operations etc). The Commission can also consider joint applications from two or more persons who wish to jointly hold the licence. Joint applicants should each complete an application form, and submit their application forms at the same time, with a covering letter explaining that a joint application is being made.

Name: Alexandrina Council

1.2 Legal identity of applicant

Provide information about the applicant, (i.e. whether the applicant is a natural person, proprietary limited or public company, partnership or local government body etc). If the applicant is a body corporate, please also state the jurisdiction in which the applicant is registered, and the applicant's ABN/ACN.

Local Government, Alexandrina Council, ABN 20 785 405 351

1.3 Address and Contact Details of applicant

Business Address:

11 Cadell Street, Goolwa

State: South Australia Post Code: 5214

Postal Address (if different to Business Address):

PO Box 21, Goolwa

State: South Australia Post Code: 5214

Telephone: 8555 7000

Facsimile: 8555 3603

E-mail: alex@alexandrina.sa.gov.au

1.4 Contact Person on behalf of applicant

The full name, title and contact details of a person to whom the Commission can direct enquiries and correspondence about the application.

Full Name: Gary Lyons

Title: Manager, Sustainable Resources

Business Address:

CWMS Depot - Skewes Road

State: Goolwa Post Code: 5214

Postal Address (if different to above):

n/a

State: South Australia Post Code: 5214

Telephone: 8555 7000

Facsimile: 8555 3603

E-mail: gary.lyons@alexandrina.sa.gov.au

1.5 Contact person for licence fees

The full name or title of the person to whom the Commission can direct enquiries and correspondence about licence fees.

Full Name: Gary Lyons

Title: Manager - Sustainable Resources

Business Address:

CWMS Depot, Skewes Road, Goolwa

State: South Australia Post Code: 5214

Postal Address (if different to above):

n/a

State: Post Code:

Telephone: 8555 7000

Facsimile: 8555 3603

E-mail: gary.lyons@alexandrina.sa.gov.au

2 The Licence

Applicants must answer all questions in this section.

2.1 A detailed description of the retail services for which a licence is sought

For example:

Water: drinking- residential and/or non-residential;

Water: non-drinking – residential and/or non-residential;

Sewerage: residential and/or non-residential; and

Sewerage – trade waste – non-residential.

The Alexandrina Council currently holds *Water Industry Retail Licence, Class – Intermediate (2) Retailer*, issued 10 January 2013 (Appendix A).

This application seeks to vary that licence to include servicing of the Coorong Quays development formerly known as The Marina, Hindmarsh Island and the greater Hindmarsh Island residential zone.

Alexandrina Council currently owns and operates the Goolwa CWMS which services the nearby township of Goolwa as well as a number of developments on the western side of Hindmarsh Island.

During 2017/18 changes to the ownership of Coorong Quays resulted in the new owner approaching Council to transition ownership & management of the privately operated Coorong Quays CWMS network. Following this approach, the Council & Coorong Quays undertook significant amounts of analysis to assess the feasibility of connecting this 'private' CWMS into the greater Goolwa CWMS. Based on the findings the Council agreed to that transition of ownership & management.

The Coorong Quays CWMS is a dedicated vacuum sewer network that currently services 830 connections and will ultimately service 1400 connections. The land use is primarily residential (95%) with a minor mix of marina administration, retirement village, hospitality (café) and associated marine services & trades.

Vacuum Connection
<ul style="list-style-type: none">• Residential allotments• Marina administration• Retirement village• Café• Marina services & trades

The private Coorong Quays WWTP is currently located on Tolarno Drive, Hindmarsh Island. It has been privately operated in some form since the 1990s. The WWTP comprises three (3) vacuum pump stations, two (2) aerators, eight (8) process storage lagoons & an irrigation wood lot. At present, the system is owned & operated in entirety by Coorong Quays.

Transition of ownership & management is documented via Agreement as June 2021.

Following June 2021 the existing plant will be decommissioned by Coorong Quays during 2021/22 with only the vacuum pump stations, vacuum mains & one (1) storage lagoon being vested to Council. The Council has recently constructed a major pump station & electrical control system on site to accommodate flows and therefore make redundant the vast majority of this private infrastructure. Works have been undertaken in accordance with Agreement held between Council & Coorong Quays.

Coorong Quays currently generates 55 ML per year. At full development, 110 ML per year is forecast. Full engineering assessment & modelling has been undertaken by Wallbridge Gilbert Aztec (WGA) to ensure viability of Council ownership.

All Coorong Quays flows will be pumped, via the new pump station, into Council's existing Goolwa CWMS. All waste water will be treated at Council's dedicated WWTP located on Kessell Road, Goolwa. This dedicated plant has capacity to process 1.5ML per day with current flows equalling 0.75ML per day at peak.

All treated water is stored in HDPE lined lagoons and re-used for turf production.

2.2 Date from which Licence is sought

If the applicant seeks to have the licence issued by a certain date, provide this date. Please note that the Commission does not undertake to issue the licence by this date. Applicants should usually allow the Commission a minimum of twelve weeks to consider an application, as a public consultation period of several weeks forms part of the Commission's consideration of licence applications.

Transition of ownership is effective from 19 June 2021. Following that date the Council assumes all ownership & management responsibility.

3 Suitability of Applicant to hold a Licence

Applicants must answer all questions in this section.

3.1 Standard of honesty and integrity shown by applicant

In deciding whether the applicant is a suitable person to hold a licence, the Commission may:

- ▶ consider the applicant's previous commercial and other dealings; and
- ▶ the standard of honesty and integrity shown in those dealings.

Please provide information that will assist the Commission in its consideration of this matter. If the applicant:

- ▶ has been found guilty of any criminal offence;
- ▶ has been successfully prosecuted under any Territory, State or Commonwealth legislation (such as the Australian Securities and Investments Commission Act 2001 or the Competition and Consumer Act 2010); and/or
- ▶ has been the subject of disciplinary action.

Details of such matters must be disclosed. Failure to disclose such information or misrepresent any matter relevant to such information may result in the cancellation of a licence.

The Commission may use the service of an external expert to assist with the assessment of the applicant's standard of honesty and integrity.

To the best of our knowledge relevant officers have not been the subject of any of the matters listed above.

Alexandrina Council currently holds *Water Industry Retail Licence, Class – Intermediate (2) Retailer*, issued 10 January 2013 (Appendix A).

3.2 Standard of honesty and integrity shown by officers and major shareholders (if relevant) of the applicant

Applicants should address responses to this question in the same manner as 3.1 above.

Alexandrina Council is current holder of *Water Industry Retail Licence, Class – Intermediate (2) Retailer*.

In addition to Water Industry Retail Licence, Council is provided governance frameworks via Environment Protection Authority (EPA) and other statutory bodies within which to operate its water business.

As a Council, our water business operates within an overarching governance & risk management framework to ensure full compliance and reporting.

3.3 Names and addresses of the officers of applicant

State the names and addresses of the officers of the applicant. “Officers” of the applicant include the applicant’s directors and secretary, or other persons who make or participate in making decisions that affect a substantial part of the business or operations of the applicant that will be licensed.

Full Name: Glenn Rappensberg

Date of Birth: n/a

Office Held: Chief Executive Officer

Business Address:

11 Cadell Street, Goolwa

State: South Australia Post Code: 5214

Full Name:

Date of Birth:

Office Held:

Business Address:

.....

State: Post Code:

Full Name:

Date of Birth:

Office Held:

Business Address:

.....

State: Post Code:

(attach additional pages if necessary)

3.4 Names and addresses of major shareholders of applicant (not relevant for local council applicants)

N/A

3.5 Details of the group members (not relevant for local council applicants)

This is information about entities controlled by the applicant, or by the ultimate parent entity of the applicant (if applicable).

N/A

3.6 Additional information

Please answer the following questions.

- ▶ Is the applicant a resident of, or does it have permanent establishment in, Australia? If the answer to this question is “no”, please provide further details.

Yes

- ▶ Is the applicant under external administration (as defined in the Corporations Act 2001) or under a similar form of administration under any laws applicable to it in any jurisdiction? If the answer to this question is “yes”, please provide further details.

No

- ▶ Is the applicant immune from suit in respect of the obligations under the Water Industry Act 2012? If the answer to this question is “yes”, please provide further details.

No

- ▶ Is the applicant capable of being sued in its own name in a court of Australia? If the answer to this question is “no”, please provide further details

Yes

3.7 Financial resources available to the applicant

Provide information about the financial resources available to the applicant which provides sufficient evidence of the current and ongoing financial capacity of the applicant to effectively provide the relevant retail services (e.g. bank guarantees, credit history and business continuity arrangements).

If the applicant is a company, please enclose a copy of the audited (and Board approved) profit and loss statement and balance sheet for the previous two financial years, including the director’s report and the audit opinion. If the applicant is a subsidiary company, please also provide a copy of the audited profit and loss statement and balance sheet of the applicant’s parent company for the previous two financial years.

If an applicant is a local council, please enclose a copy of the audited profit and loss statement and balance sheet for the previous two financial years.

Applicants should also submit copies of business plans which detail the strategic direction of the applicant, including its objectives, identified opportunities in the market place and forecast results.

Council’s Annual Business Plan & Budget, Community Strategic Plan (CSP) and Financial Statements are available from its website at;

<https://www.alexandrina.sa.gov.au/council/council-publications>

These publications have financially modelled the expected revenue and expenditure changes from the Coorong Quays acquisition.

3.8 Human resources available to the applicant

Provide information about the human resources available to the applicant, for example, the number of employees and the experience of these employees in providing the services for which the licence is sought. If the applicant will employ contractor/s to assist with the licensed operations, please provide the name of that contractor/s, and details about the experience of the contractor/s in such operations and details of the processes in place to ensure the contractor/s will comply with the regulatory obligations imposed by the licence.

Alexandrina Council employs 175 staff as at 2021 across all areas of responsibility.

The Sustainable Resources Division, responsible for delivery of the water business, employs 10 full time and 2 fixed contract staff – including management, design, operations and electrical specialists. As part of the Coorong Quays transition plan the Council has further recruited 1 permanent role with an additional 2 FTE to be recruited during 2021 / 22.

The planned staffing structure is detailed below.

Further details of the staff that manage the CWMS system are detailed within Item 3.9 below.

3.9 Technical resources available to the applicant

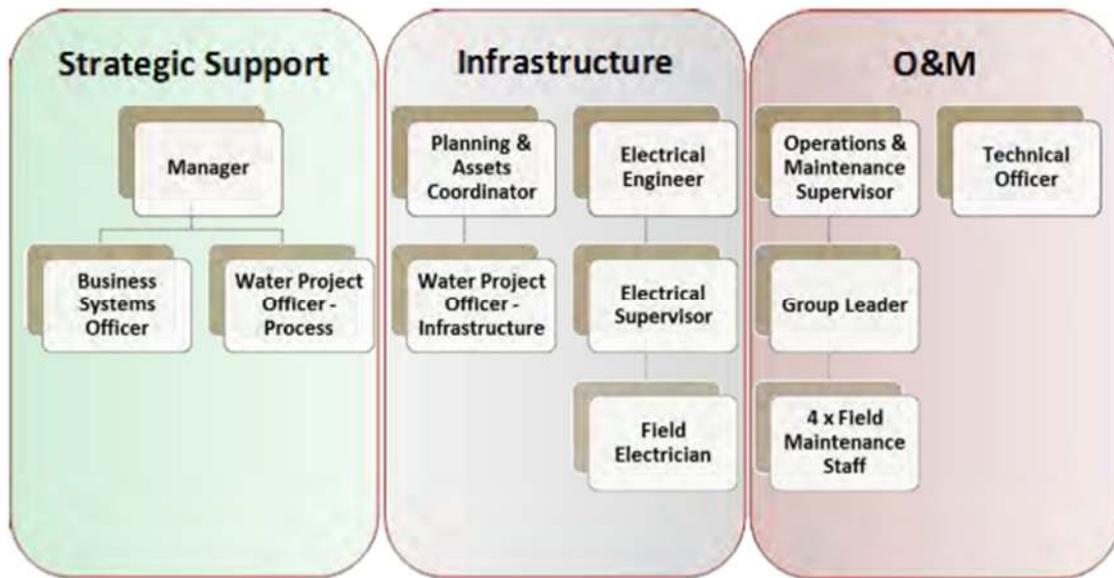
Applicants are asked to provide details about the availability of technical resources to be used in carrying out the services for which a licence is sought. The information should include details about the technically qualified staff available to the applicant and (if relevant) of experience gained in similar operations.

Applicants must also provide sufficient details of the systems and processes to be used to market and/or communicate with customers, to provide bills, to follow up payments and process customer move-ins and move-outs and deal with customer enquiries and complaints.

The Sustainable Resources Division has operated the Council's waste water operations since waste water operations commenced within the district, estimated as approx. 1965.

Alexandrina Council's CWMS operations encompass gravity, pressure, vacuum, treatment & disposal systems; from collection, through processing to ultimate disposal via irrigation. The Goolwa CWMS is one of five (5) CWMS schemes operated across the district by dedicated CWMS staff.

As detailed within Council's Asset Management Plan, the CWMS team structure is documented below.



3.10 Contracts

Applicants must provide reasonable evidence that they are able to meet reasonably foreseeable obligations under contracts for the sale and supply of water or the sale or supply of sewerage services (or both) as the case may be. Such contracts would include contracts whereby the applicant is reliant on a supply of water or specific sewerage service from a third party which intends to on sell to its customers.

Following agreement in 2006, Alexandrina Council & Brook Turf Pty Ltd (commercial turf operations) have been engaged in commercial partnership for water usage. This commercial agreement was entered into following a dedicated LGA governance process, and linked to a 21 year lease term via the LG Act.

Fixed volumes of recycled water are delivered to the production site via a Council infrastructure with Council sharing in portion of annual commercial profit.

This agreement is considered both successful and commercially viable for both parties, and no change to that commercial arrangement is proposed.

3.11 Suitable and appropriate infrastructure

The Commission may not issue a licence unless it is satisfied that the infrastructure to be used in connection with the relevant service is appropriate for the purposes for which it will be used. Applicants are therefore asked to provide a detailed description of the infrastructure that will be utilised by the applicant in providing the retail services for which the licence is sought and verify that the infrastructure has been (or will be) developed in accordance with relevant Australian Industry Codes and Australian Standards with reference to technical specifications or reports.

If an applicant does not own the infrastructure to be used in delivering the relevant retail services, the applicant must provide information regarding the appropriateness of that infrastructure and of the binding arrangements that are (or will be) in place with the owner of the infrastructure in regards to the use of the infrastructure.

The Alexandrina Council operate and manage their Goolwa CWMS scheme in accordance with requirements defined by ESCOSA, EPA and Department of Health.

Approvals currently in place include;

ESCOSA	<i>Water Industry Retail Licence, Class – Intermediate (2) Retailer (10/01/2013)</i>
EPA	EPA 2132; Sewerage Treatment Works or Septic Tanks Effluent Disposal Scheme, Goolwa
Department of Health	<p>WCS2078 – Goolwa Scheme Reclaimed Water Irrigation System Utilising Class C recycled Water from the STEDS Lagoons (18/07/2006)</p> <p>WCS2248 – Winter Storage Lagoon and Connecting Pipe Work at Kessell Road, Goolwa (9/02/2007)</p> <p>WCS2457 – Wastewater Treatment Plan, Goolwa (21/8/2008)</p> <p>2013-01730 - Upgrade of Goolwa CWMS, Wastewater Treatment Lagoon and Decanting Tank (15/10/2013)</p> <p>2001-03532/1 – Brook Turf User Approval (31/01/2012)</p>

Council's *Draft* 2020-2030 Asset Management Plan, inclusive of the Wastewater & Water Supply plan, was approved by Council and released for public consultation in December 2020.

The *Draft* Asset Management Plan documents the Council's strategy, future vision & financial commitment for the CWMS with the next 10 year horizon and beyond. Council's *Draft* Asset Management Plan and Council's Audit Committee documents are available from its website at;

<https://www.alexandrina.sa.gov.au/council/council-publications>

Council's CWMS is a comprehensive scheme that operates on a 24 / 7 basis and is managed, operated and maintained in strict accordance with statutory approvals, and legislated requirements.

3.12 Risk management

Provide confirmation and reasonable evidence that the applicant's management has identified the risks associated with the retail services it intends to provide and has established, utilises and relies upon risk management systems and processes which are adequate, accurate and current to address those risks. A copy of the applicant's risk management strategy should be submitted.

Alexandrina Council's business is managed and administered within a framework defined and documented within the Risk Management Policy, Risk Management Policy (both dated 21 October 2019) and the Alexandrina Council Business Continuity Plan dated 19 January 2019.

These documents articulate the organisations approach to the overarching Risk Management portfolio.

Council's *Risk Management Policy* document is attached as **Appendix B**, *Risk Management Framework* is attached as **Appendix C** and *Alexandrina Council Business Continuity Plan* is attached as **Appendix D**.

As part of the strategic growth plans for the water industry a Technical Officer will be employed to drive continuous improvement in this area. This will include but not be limited to the integration of Coorong Quays into key Technical Regulator, Department of Health and EPA documentation.

3.13 Licences held by the applicant in other Australian jurisdictions

If the applicant holds, or has previously held, a retail services licence or equivalent in other Australian jurisdictions please provide details. If a licence previously held has been suspended or cancelled, please provide details.

N/A

Licences as documented within Item 3.11.

3.14 Previous unsuccessful licence applications in other Australian jurisdictions

Please state whether the applicant has applied for a water retail licence or equivalent in another Australian jurisdiction and not been issued with a licence, and provide relevant details.

N/A

3.15 Licences held by associates of the applicant

If an associate of the applicant (within the meaning of the Corporations Act) holds a water retail licence in South Australia or in other Australian jurisdictions, please provide details.

N/A

3.16 Compliance plan

Applicants are required to submit a copy of their Compliance Plan which details what compliance systems the applicant has (or will have) in place and a description of how these systems will ensure compliance with the applicable regulatory obligations imposed by a licence and the Water Retail Code. The Commission expects that a Compliance Program will, as a minimum, document:

- ▶ the obligations that will apply to the applicant;
- ▶ the processes that are (or will be) in place to ensure the applicant's compliance with obligations;
- ▶ details on how compliance is monitored;
- ▶ details of how non-compliance will be reported and rectified; and
- ▶ details of any internal audit programs in place that review (or will review) the effectiveness of the Compliance Program from time to time.

Alexandrina Council Business Continuity Plan (Appendix D) defines frameworks, responsibility statements, notification chains & direct actions to ensure system compliance is met. In conjunction with the suite of other Council governance documents this plan is overarching and caters for the Council's CWMS network compliance overall.

Council considers this document, Risk Management Policy, Risk Management Framework, Water Plan 2020 – SRMTMP OTR and current ESCOSA – Water Retail Licence document provides the governance measures to ensure system compliance is actively managed & achieved.

3.17 Additional information

The Commission encourages applicants to provide any additional information they consider would be of assistance in supporting the application. Please provide below.

Alexandrina Council's CWMS Department is managed and administered within a framework defined and documented within the Risk Management Policy, Risk Management Policy (both dated 21 October 2019) and the Alexandrina Council Business Continuity Plan dated 19 January 2019.

These documents articulate the organisations approach to the overarching Risk Management portfolio.

Council's Asset Management Plan documents in detail Council's commitment to the overarching management & operations of the greater CWMS. Within that document a comprehensive commentary is provided on Council's commitment to Levels of Service, Future Demand, Lifecycle Management, Risk Management, Financial Management, Plan Improvement & Monitoring of the CWMS overall.

In addition, Council's most recent *Water Plan 2020 Safety Reliability Maintenance Technical Management Plan – Office Technical Regulator* (Appendix E) and Council's *CWMS Report Department of Health (DHA) Annual Monitoring Report* (Appendix F) are attached for further relevant ownership, management & maintenance information.

4 Factors specified in the Essential Services Commission Act 2002

In considering a licence application, the Commission must have as its primary objective the protection of the long term interests of consumers with respect to the price, quality and reliability of essential services, and must also have regard to the need to:

- (a) promote competitive and fair market conduct;
- (b) prevent misuse of monopoly or market power;
- (c) facilitate entry into relevant markets;
- (d) promote economic efficiency;
- (e) ensure consumers benefit from competition and efficiency;
- (f) facilitate maintenance of the financial viability of regulated industries and the incentive for long term investment;
- (g) promote consistency in regulation with other jurisdictions.

If the applicant believes that information about their application would assist the Commission in its consideration of these factors, the applicant should provide such information below.

N/A

5 Application Fees

Applicants for a licence must pay the Commission an application fee which is fixed by the Treasurer. Please enclose this fee with the application. An application cannot be considered until this fee has been received.

6 Declaration

All information in this application for the issue of a licence to authorise the provision of retail services in the water industry in South Australia must be verified by a Statutory Declaration of the applicant, in accordance with the provisions of the Oaths Act 1936 (SA)³, stating that the information contained in the application is true and correct to the best of the applicant's knowledge, information and belief.

In conjunction with this declaration, evidence of the relevant authority of the declarant to sign on behalf of the applicant must also be provided to the Commission.⁴

Statutory Declaration

I Glenn Rappensberg

of Alexandrina Council

do solemnly and sincerely declare that the information contained in this Application for the issue of a licence to authorise the provision of retail services in the water industry in South Australia is true and correct to the best of my knowledge information and belief.

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1936.

Date 1/4/2021
Signature 

(Where the applicant is a body corporate, the declaration must be made by a person authorised by body corporate to sign on its behalf)

Declared at:this day of20....

Before me:

(Signature of Justice of the Peace or other person authorised under the Oaths Act 1936)

³ Or equivalent legislation in other Australian jurisdictions.

⁴ The Commission will accept a copy of a Board or Council minute (or circulating resolution) giving approval for the declarant to sign on behalf of the applicant as evidence of the relevant authority.



The Essential Services Commission
Level 1, 151 Pirie Street Adelaide SA 5000
GPO Box 2605 Adelaide SA 5001
T 08 8463 4444

E escosa@escosa.sa.gov.au | W www.escosa.sa.gov.au