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**Subject:** SAWRD24 submission – Regulatory business proposal  
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## OFFICIAL

Good Afternoon

The OTR Water and Sewerage Infrastructure team have reviewed SA Waters Regulatory Business Proposal for 24-28 as submitted to ESCOSA and have the following general comments.

- We are overall supportive of SA Water’s general asset management and investment strategy including the proposed CAPEX projects for water and sewerage infrastructure assets and the systems to support operations.
- We note the support from the customer challenge groups and willingness to pay surveys.
- More information is needed to support the change to the customer service standard 21 “Sewer overflow clean-up timeliness – metro areas”. The proposed change introduces certain situations where an exceedance in the time limit for clean-up is excluded from reporting. These situations include agreed delays where the customer requests a different response time or where property access is restricted, or the circumstances are unsafe. Page 64 shows a decrease in the standard being met over the last four years from >98% in 2020 to 95% in 2023. The business proposal states *“The instances this target was not met were considered beyond SA Water’s control. This included where customers requested the clean-up to be completed when it suited them and later than the target time, where accessing the site was unsafe, or where the clean-up was in an inaccessible location.”*
- Additional information that SA Water could provide to support amending service standard 21 includes:
  - an explanation of why there has been a consistent decrease in meeting the clean-up time target over the last four years. The reasons for customer requested delays stated are reasonable, but there is no explanation as to why an increase of requests has occurred.
  - A breakdown of the delays which were beyond SA Water’s control. i.e. safety and access issues vs customer requested delays.

Happy to discuss further.

Kind regards  
Natalie

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