

In reply please quote our reference: 628182 / ST : LC

25 June 2015

Mr Richard Webster
Manager, Regulatory Reporting
Essential Services Commission of SA
GPO Box 2605
ADELAIDE SA 5001

Dear Mr Webster

Simplifying Annual Reporting requirements for Minor and Intermediate Retailers

Thank you for the opportunity to provide comment on the Essential Services Commission of SA's (ESCOSA) draft determination regarding the simplification of annual reporting requirements for minor and intermediate retailers

Over half of the 68 Councils in South Australia, are minor and intermediate retailers, including many small rural/regional Councils. As such the Local Government Association of South Australia (LGA) welcomes simplification to the reporting requirements under the licencing regime. The proposed alignment of reporting dates, simplification of the pricing policy questionnaire and the simplified sign off requirements are all positive changes that will provide Councils with a more streamlined approach to reporting.

Councils are however still raising concerns regarding the overall reporting requirements under the current licencing regime. In particular the volume of reporting and multiple parties that require reports is a significant burden on Councils. Currently reporting is required by ESCOSA, Environment Protection Authority (EPA), Department of Health, Local Government Grants Commission, Office of the Technical Regulator and others. It is administratively in-efficient for these reporting requirements, often for a single water asset, to be done separately, in different formats, with duplication of information.

The LGA requests that ESCOSA consider the overall reporting requirements of minor and intermediate retailers and investigate opportunities for consolidation of reporting requirements in a single format that can be accessed by a range of agencies requiring reporting. The LGA offers its on-going support in these discussions to ensure Council perspectives are considered in any simplification process. The LGA is happy to partner with ESCOSA wherever possible to assist in building the capacity of Councils in meeting reporting requirements and associated activities.

I would also like to acknowledge ESCOSAs approach of supporting Councils in meeting some of the more technical reporting requirements. This light handed regulatory effort has been noted and is commended.

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Thank you again for the opportunity to comment and please don't hesitate to contact me for any further information or clarification.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Gray', written in a cursive style.

Adam Gray
Director, Environment

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