
From: Julian James <juljam@onkaparinga.sa.gov.au>
Sent: Friday, 19 June 2015 4:31 PM
To: Webster, Richard (ESCOSA)
Cc: Lim, Peter (ESCOSA); Ben Hall; Luke Seidel
Subject: RE: Simplifying Annual Reporting Requirements for Minor and Intermediate Retailers

Hi Richard,

In response to the Commission's request for feedback on the draft reporting simplification we provide the following:

Draft Decision 1 – Sign off date extended to 30 November

- We support the principle of all reporting to ESCOSA to be provided by a single date (30 November).

Draft Decision 2 – Pricing Questionnaire Simplification

- We support the simplification of the questionnaire to support the transition and tracking of compliance with the pricing principles
- In relation to the purpose of the questionnaire and the draft wording provided (which suggests that retailers are able to provide a plan for compliance with the relevant pricing principles) - we request that:
 - ESCOSA clarify the position indicated in their 2013-14 annual reporting feedback letters (Minor and Intermediate retailers) that the Commission expects full cost recovery to be achieved by the end of the first price determination. This seems to be a marked departure in the Commission's language from the final price determination which states that:
 - *Sewage – “The Commission’s final decision is that Minor and Intermediate Retailers will be required to apply all of the NWI Pricing Principles for recovery of capital expenditure, and Principles 1,4,5,6,7,8,9 and 10 for setting urban water tariffs to their sewerage pricing during the first price determination period. The Commission, however, accepts that some Minor and Intermediate Retailers will require a transitional period before achieving full compliance with these NWI Pricing Principles.”*
 - *Recycled and Stormwater supply - “The Commission’s final decision is to require Minor and Intermediate Retailers to apply all of the NWI Pricing Principles for recycled water and stormwater to their recycled water and stormwater pricing during the first price determination period.Minor and Intermediate Retailers' recycled water and stormwater pricing practices will transition gradually to compliance with the NWI Pricing Principles.”*
 - *The detail of the price determination also indicates a stronger requirement for the application of the pricing principles to sewerage services that to the supply of recycled effluent and stormwater (presumably because of the availability of substitutes and therefore greater consumer choice).*

Draft Decision 3 – Sign Off Requirements

- We request that ESCOSA consider that a single sign off may result in the situation where the overall sign off is delayed due to an internal concern with one of the subsidiary reports.

- We also request that ESCOSA consider allowing sign off by a responsible officer under delegation from the CEO.

Regards,

Julian James

Team Leader Commercial (Acting)
Finance, Assets and Commercial Viability
8301 7242
0449 505 847
www.onkapingacity.com



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From: Webster, Richard (ESCOSA) [mailto:Richard.Webster@escosa.sa.gov.au]
Sent: Tuesday, 26 May 2015 2:21 PM
Cc: Lim, Peter (ESCOSA); Webster, Richard (ESCOSA)
Subject: Simplifying Annual Reporting Requirements for Minor and Intermediate Retailers

The Essential Services Commission of South Australia (Commission) is seeking comment from all interested parties on draft changes to the reporting requirements for Minor and Intermediate Water Retailers set out in its Water Industry Guidelines. The aim of the changes are to assist the Commission in performing its regulatory functions and to reduce red tape for Minor and Intermediate Retailers. Your organisation is a licensed Minor or Intermediate Retailer of water and/or sewerage services under the *Water Industry Act 2012* so these changes will apply to you.

The Commission is responsible for the economic regulation of water and sewerage services provided by Minor and Intermediate Retailers and issues Water Industry Guidelines to specify reporting requirements in relation to performance monitoring, compliance and retail pricing matters.

The proposed changes aim to:

- Simplify and align the sign-off requirements for all annual reporting to the Commission.
- Streamline the price monitoring reporting requirements relating to compliance with the prescribed pricing principles.

Further details on the changes are attached or can be found on the Commission website.

Please contact Peter Lim or Richard Webster on 8463 4444 if you have any queries in relation to the proposals.

Written submissions on the Draft Decision should be provided by Friday 19 June, 2015.

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