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Economic Regulation of Minor and Intermediate Retailers
Essential Services Commission of SA
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Dear Sir,

Re: Submission on Draft Water Retail Code – Intermediate Retailers

I am writing to you in response to your request for submissions on the proposed regulatory framework and the draft Water Retail Code – Intermediate Retailers. Council has been issued a Water Industry Retail Licence as we operate a Community Wastewater Management System (CWMS) to properties within the Kingston SE township. The CWMS provides connections to 791 occupied properties and 160 vacant properties.

I note under Section 12.1 of your proposed regulatory framework that: "A retailer must confer on each of its customers the right to effect termination of a standard contract by providing at least 3 business days' notice".

Our CWMS has been established for many years to take wastewater from households. If a customer terminated this arrangement with 3 day's notice what would be the responsibility for the customer for the removal and disposal of their wastewater? There are many health issues for the removal/disposal of wastewater and a customer can't just "terminate" the service. Could you please explain how this would work in a practical situation? I can understand having this clause for retail services such as the supply of electricity where there could be multiple service providers however in a country town there will only be a Council who can provide for the removal/disposal of wastewater that complies with the relevant health regulations.

I propose that you also need to address the customer obligations for the removal/disposal of wastewater that complies with the relevant health regulations in relation to a CWMS.

Please do not hesitate to contact me if you require any further information.

Yours faithfully,

Nick Brown
Chief Executive Officer

