

## ESCOSA Water Regulatory Information Requirements for Intermediate and Minor Retailers

Clause	Content	Requirement	Question / Comment
		General statement	<ul style="list-style-type: none"> <li>General reporting information, in particular with regard to accounting treatments represent minor changes in current practices. We look forward to collaborating with ESCOSA through the transitional period in the so that these proformas may be adapted to both suit the manner in which licensees operate their businesses, whilst meeting the expectations and requirements of the Act. The general impact of these changes is at this time not yet able to be quantified.</li> </ul>
		General statement	<ul style="list-style-type: none"> <li>We request that ESCOSA clarify why there is an expectation that reporting include elements of the licensees business that are not the subject of regulation. For example:               <ul style="list-style-type: none"> <li>PROFORMA OP1.1 – overall business telephone calls (see specific note below)</li> <li>ACCOUNTING PROFORMA(s) – unregulated services</li> <li>ACCOUNTING PROFORMA(s) – excluded services (as was presented on the regulatory account excel spreadsheet that was provided for comment)</li> </ul> </li> </ul>
	PROFORMA OP1.1	Timeliness of response to telephone calls	<ul style="list-style-type: none"> <li>The City of Onkaparinga call centre receives approximately 200,000 phone calls/annum (3,000-4,000 calls a week). This does not include those calls that are made direct to staff.</li> <li>The nature of these calls is highly varied and whilst a system is in place to categorise these phone calls it is not practical to introduce a separate KPI for calls related to the provision of a water retail service as the nature of an enquiry is not known until a call is taken.</li> <li>The nature of council's water business and the relationships forged</li> </ul>

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			<p>directly with the users of the water (as were categorised through the consultation on the economic regulation) means that consumers typically contact individuals responsible for the management of the scheme directly via personal line, email and or mobile. We feel the requirement to convert this into a statistical data contradicts the nature of our business and our true customer relationship performance.</p> <p>We request that ESCOSA acknowledge the nature of alternative water schemes and CWMS as minor and intermediate retailers and reconsider the indicators in direct discussion with those licensees to determine a more feasible set that would not be unduly onerous and that are relevant to the performance of the operation.</p>