



Ref: 16/REG/WLIC/1/MM

21 May 2013

Essential Services Commission of SA  
GPO Box 2605  
ADELAIDE SA 5001

Dear Sir/Madam,

**ESCOSA's Water Regulatory Information Requirements for Intermediate and Minor Retailers – Water Industry Guideline No. 3 (WG3/01), Consultation Draft**

Thank you for providing Council with the opportunity to provide comment on the above mentioned document. It is understood the Local Government Association Community Wastewater Management System Management Committee (on which Council has a representative) will be submitting a detailed response. Mindful of the LGACWMSMC response the following complementary comments are provided.

Mid Murray Council stands to be particularly affected by reporting/operational requirements as we have both CWMS (a proportionally large number for a rural Council) and water supply infrastructure predominantly located along the River Murray. Under current legislative requirements Council reports annually to the Department of Health and Ageing relating to operational performance. We have a dedicated CWMS Maintenance Advisory Committee that meets bi-annually to discuss finances and operational issues associated with CWMS and Council also has an obligation to meet the financial requirements of the Local Government Act.

**OP1.1 – Timeliness of response to telephone calls**

Council is committed to assessing and improving service delivery standards however this requirement should be deleted as it is currently unrealistic and certainly unachievable.

**OP1.2 – Customer complaints**

Mid Murray Council as it is suggested the majority of rural Councils, will struggle to meet this reporting requirement. It is possibly achievable but will impact on staff resources.

**OP3.1 & OP3.2 – Water and sewerage infrastructure reliability**

Achievable but will have an impact on limited staff resources.

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**OP4.1(b) – Statistical information (Sales)**

In some instances this will require substantial upgrades of the systems to record incoming and outgoing water and sewerage levels. This will incur additional costs to already financially burdened systems.

To some degree, this information is already provided in Council's annual report to the Department of Health and Ageing and this is the information that Mid Murray Council will be providing to ESCOSA.

Should you require additional information or clarification of the above please contact me at the Cambrai office on 8564 6020 or by email at [cthomas@mid-murray.sa.gov.au](mailto:cthomas@mid-murray.sa.gov.au).

Yours faithfully,



Caroline Thomas  
**Manager – Health Services**