Hunter Water Corporation Reporting Manual

Water — Draft Reporting Manual
December 2016
## Amendment Record

<table>
<thead>
<tr>
<th>Issue No</th>
<th>Date Issued</th>
<th>Reasons/for Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>RM-HWC-V1</td>
<td>July 2012</td>
<td>First Release</td>
</tr>
<tr>
<td>RM-HWC-V2</td>
<td>June 2013</td>
<td>Changes to performance indicators and reporting of opportunities for improvement</td>
</tr>
<tr>
<td>RM-HWC-V3</td>
<td>December 2016</td>
<td>Amended to complement the draft 2017-2022 licence</td>
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- Ms Catherine Jones
- Mr Ed Willett

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1 Introduction

The Independent Pricing and Regulatory Tribunal (IPART) is responsible for monitoring and reporting on Hunter Water Corporation’s (Hunter Water) compliance with its Operating Licence (Licence).

1.1 Purpose of the Reporting Manual

The Licence contains a number of reporting obligations with which Hunter Water must comply. The Reporting Manual outlines all of Hunter Water’s reporting requirements under its Licence. This Reporting Manual identifies:

- when Hunter Water must report
- what information Hunter Water must report
- to whom Hunter Water must report, and
- how Hunter Water must report.

It is a condition of Hunter Water’s Licence that it must comply with the reporting obligations set out in this Reporting Manual.¹

This Reporting Manual does not reproduce Hunter Water’s Licence obligations in full. It is still necessary for Hunter Water to refer to the Licence and to any law, statutory instrument or document referred to in the Licence obligations (eg, guidelines, etc).

1.2 Definitions and interpretation

Terms that are defined in the Licence have the same meaning in this Reporting Manual, unless the terms are separately defined in this Reporting Manual.

The interpretation provisions in the Licence apply to this Reporting Manual, with all references to the Licence in those provisions taken to be references to this Reporting Manual.

¹ Clause 5.2.1 of the Licence.
1.3 Structure of this Reporting Manual

This Reporting Manual is structured as follows:

- Section 1 details how Hunter Water is to report and provide a summary of the reporting schedule.
- Sections 2 to 6 outline the specific reporting requirements for each section of the Licence, when to report and who to report to, according to the reporting schedule in Table 1.

1.4 Changing this Reporting Manual

At time we may change this Reporting Manual to:

- reflect changes in the applicable law, including the Act
- include additional reporting obligations where appropriate
- include references to new Licence obligations
- delete references to Licence obligations that are no longer relevant
- amend the information that Hunter Water must provide to IPART and to NSW Health (as the case may be), and
- improve the reporting process.

Before we change this Reporting Manual (other than changes to correct minor grammatical or typographical errors), we will consult with Hunter Water and other interested stakeholders. We will then notify Hunter Water and stakeholders of the changes to this Reporting Manual and the start date for any new reporting arrangements. In determining the start date of changes, we will make sure there is enough time for Hunter Water to implement new arrangements to enable the reporting.

1.5 When should the information be reported?

Hunter Water’s reporting schedule is summarised in Table 1. We have grouped reporting requirements into:

- ‘periodic’ reporting (i.e., monthly, quarterly, annual etc), and
- ‘as required’ reporting.

Appendix A to this Reporting Manual provides a complete timeline for Hunter Water’s reporting requirements under its Licence.
1.6 How should the information be reported?

1.6.1 Reporting to IPART

Hunter Water should provide the required information in a clear and concise report. Where this Reporting Manual requires information on more than one area (e.g., water quality and environment) at the same time, Hunter Water is encouraged to provide the information in a single report. However, Hunter Water may choose to report the information in separate reports.

The reports must be approved by Hunter Water’s Managing Director.

Hunter Water must lodge each report electronically with a hard copy sent by mail. When lodging a report, Hunter Water must also provide the name and contact details (phone, email) of the primary contact with whom IPART can liaise when assessing compliance, and an alternative contact for those times when the primary contact is unavailable.

Electronic reports must be emailed to: compliance@ipart.nsw.gov.au, or to the last email address notified by IPART to Hunter Water.

Hard copy reports must be sent to:

- The Chief Executive Officer
- Independent Pricing and Regulatory Tribunal of NSW
- PO Box K35
- Haymarket Post Shop NSW 1240

or to the last address notified by IPART.

1.6.2 Reporting to NSW Health

Hunter Water must provide reports to NSW Health as outlined in this Reporting Manual.

Hunter Water must lodge each report electronically with a hard copy sent by mail. When lodging a report with NSW Health, Hunter Water must also provide the name and contact details (phone, email) of the primary contact with whom NSW Health can liaise when assessing compliance, and an alternative contact for those times when the primary contact is unavailable.

Electronic reports must be emailed to: waterqual@doh.health.nsw.gov.au, or to the last email address notified by NSW Health to Hunter Water.
1 Introduction

Hard copy reports must be sent to:

Environmental Health Manager
Hunter New England Population Health
Locked Bag 10
WALLSEND NSW 2287

or to the last address notified by NSW Health.
### Table 1  
**Summary of Hunter Water’s reporting schedule and requirements**

<table>
<thead>
<tr>
<th>Reporting frequency</th>
<th>Water conservation</th>
<th>Supply services and performance standards</th>
<th>Organisational systems management</th>
<th>Performance monitoring and reporting</th>
<th>Customer and stakeholder relations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>‘Periodic’ Reporting</strong></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Monthly</td>
<td>Drinking water quality monitoring report(a)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Fluoride monitoring report(b)</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Quarterly</td>
<td>Exception report on drinking and recycled water quality(b)</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Annually</td>
<td></td>
<td>Audit recommendation report – 31 March</td>
<td>Statement of compliance – 1 September</td>
<td>NWI indicators – 1 September</td>
<td></td>
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<tr>
<td>Compliance and performance report – 1 September</td>
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<tr>
<td>Water conservation report from 1 Sept 2020</td>
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</tbody>
</table>
## Reporting Frequency

<table>
<thead>
<tr>
<th>Reporting frequency</th>
<th>Water conservation</th>
<th>Supply services and performance standards</th>
<th>Organisational systems management</th>
<th>Performance monitoring and reporting</th>
<th>Customer and stakeholder relations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>As required</strong></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>By a specific date</td>
<td>ELWC approach and principles – 1 November 2017</td>
<td>Customer survey report – 31 December 2020</td>
<td>AMS certification – 1 July 2018</td>
<td>MoU with Fire and Rescue NSW – 31 December 2017</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ELWC methodology – 1 November 2018</td>
<td>Strategic asset management plan – 1 July 2018</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Water conservation program – 1 September 2019</td>
<td>EMS re-certification – September 2018</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Per event as triggered</td>
<td>Change in ELWC methodology</td>
<td>Incident notification b</td>
<td></td>
<td>Notify changes to Customer Contract</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Significant change notification in drinking and recycled water quality management systems c</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Notes

- **a** Report to the public via Hunter Water’s website.
- **b** Report to NSW Health only.
- **c** Report to NSW Health and IPART.

**Note:** All reports are to be submitted to IPART unless otherwise stated. See further details in the corresponding chapters of the Reporting Manual.
2 Water conservation

This section relates to Hunter Water’s reporting obligations under clause 2 of the Licence.

2.1 ‘Periodic’ reporting

2.1.1 Annual compliance and performance reporting (pre ELWC Water Conservation Program)

Until IPART approves the new Economic Level of Water Conservation (ELWC) methodology (under clause 2.1.3 of the Licence), Hunter Water must prepare, for each financial year, a report as a component of the annual compliance and performance report, by 1 September following the end of the relevant financial year, or by a later date agreed to by IPART.

The report must include:

▼ Hunter Water’s compliance with the Water Conservation Target (refer to operating licence clause 2.1.5);

▼ an update on the projects that Hunter Water has undertaken in the financial year to achieve the Water Conservation Target, including:
  – a description of each project, and
  – an estimate of the amount of water that was saved as a result of each project, and

▼ a list of projects that Hunter Water proposes to undertake to achieve the Water Conservation Target, including:
  – a description of each project, and
  – an estimate of the amount of water that will be saved as a result of each project.
an estimate of the maximum reliable quantity of water that Hunter Water can supply from one year to the next, from its existing water storages, taking into account and quantifying all relevant factors including but not limited to:

- the capacity of the water storages, and the rates of depletion and recovery of water in the water storages at current rates of consumption;
- climatic data, trends and projections;
- supply to and/or from areas outside the Area of Operations; and
- constraints on extraction of water to the water storages, including those imposed by Licences and approvals under the Water Act 1912 (NSW), the Water Management Act 2000 (NSW) and conditions in the relevant water sharing plans.

[Note: Under clause 2.1.5 of the Licence, Hunter Water must continue to report on its compliance with the Water Conservation Target until the Water Conservation Program is developed. This section 2.1.1 requires Hunter Water to report on its compliance with the Water Conservation Target as well as the actions it has taken or proposes to take to maintain such compliance.

Reporting of the maximum reliable quantity of water should be based on the yield definition in Hunter Water’s H250 Plan (the integrated water resource plan published in 2008) until a new definition of yield is developed under the Lower Hunter Water Plan.]

2.1.2 Annual Water Conservation Report (post ELWC Water Conservation Program)

In accordance with clause 2.1.7 of the Licence, Hunter Water must submit the Water Conservation Report to IPART by 1 September following the end of the relevant financial year, or by a later date agreed to by IPART.

The Water Conservation Report must:

- Include the elements of Hunter Water’s water conservation program for the previous financial year and for at least the next five financial years, including (but not limited to):
  - Hunter Water’s strategies, programs and projects relating to water storage and transmission, water leakage, recycled water and water efficiency
  - Hunter Water’s water conservation objectives, targets and timetables, and
  - The extent to which these elements accord with the economic level of water conservation activity and the methodology.

- Describe and explain Hunter Water’s progress against implementation (or otherwise) of each of the elements of its water conservation program for the previous financial year, including any deviations from this program.
Describe and explain any changes to Hunter Water’s water conservation program relative to the previous annual Water Conservation Report, from the second year of reporting.

Outline how Hunter Water’s water conservation program relates to the Lower Hunter Water Plan (LHWP).

Include information on the following measures for the previous financial year, as well as earlier financial years (where applicable) of the Licence term:
- the level of water leakage from Hunter Water’s Drinking Water supply system against the economic level of leakage for that financial year
- the volume of water sourced from Recycled Water (in Megalitres), and
- the quantity of Drinking Water drawn by Hunter Water from all sources, expressed in Gigalitres per year (aggregate), litres per person per day (weather corrected) and kilolitres per person per year (weather corrected).

[Note: IPART: (a) does not expect that Hunter Water will have fully implemented all of the water conservation activities set out in the First Water Conservation Report, (b) expects that the First Water Conservation Report will capture activities implemented after the development of the Water Conservation Program, which do not necessarily cover the full financial year, and (c) anticipates that the five year plan set out in the First Water Conservation Report may be subject to change as the methodology becomes more established.]

### 2.2 ‘As required’ reporting

<table>
<thead>
<tr>
<th>Required report</th>
<th>Date</th>
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<tbody>
<tr>
<td>Principles and Approach Report (for approval)</td>
<td>1 November 2017</td>
</tr>
<tr>
<td>Methodology (for approval)</td>
<td>1 November 2018</td>
</tr>
<tr>
<td>Water Conservation Program Report</td>
<td>1 September 2019</td>
</tr>
<tr>
<td>Water Conservation Report</td>
<td>1 September each year</td>
</tr>
</tbody>
</table>

#### 2.2.1 Economic level of water conservation – Principles and Approach

Hunter Water must prepare a report outlining Hunter Water’s approach to, and principles for, developing the methodology. Hunter Water must submit the report to IPART by 1 November 2017.

#### 2.2.2 Economic level of water conservation – Methodology

Hunter Water must prepare a report outlining Hunter Water’s methodology in accordance with the approach and principles. Hunter Water must submit the report to IPART by 1 November 2018.
2.2.3 Economic level of water conservation – Water Conservation Program

Hunter Water must prepare a water conservation program in accordance with the methodology. Hunter Water must submit the report on the program to IPART by 1 September 2019.

2.2.4 Notification of changes to economic level of water conservation methodology

Once the methodology is approved by IPART, Hunter Water must:

- notify IPART of any changes that it proposes to make to the methodology, and
- obtain IPART’s consent to make any changes to the methodology prior to implementing the changes.

2.3 Publicly available documents

Hunter Water must make the Water Conservation Report available to any person, free of charge:

- on its website for downloading, and
- at its offices for access or collection by any member of the public.
3 Supply services and performance standards

This section sets out Hunter Water’s reporting obligations for clause 3 of the Licence.

3.1 ‘Periodic’ reporting

3.1.1 Monthly Water Quality Monitoring Report – Drinking Water

Hunter Water must prepare a report that summarises the results of routine monitoring of Drinking Water quality, which is undertaken each month under the monitoring program developed as part of the Drinking Water Quality Management System (Monthly Water Quality Monitoring Report).

Hunter Water must report publicly on the Monthly Water Quality Monitoring Report in accordance with section 3.3 of this Reporting Manual by the second week of the following month.

[Note: Under clauses 3.1.1 and 3.1.2 of the Licence, Hunter Water must maintain and implement a Drinking Water Quality Management System, i.e., a Management System that is consistent with the Australian Drinking Water Guidelines. The Australian Drinking Water Guidelines provide a framework for good management of Drinking Water supply. One of the central aspects of the framework is the use of monitoring to confirm the effectiveness of the preventive measures and barriers to contamination, and to enhance Hunter Water’s understanding of the performance of the system that implements the Australian Drinking Water Guidelines.

To comply with the Licence, the Drinking Water Quality Management System must include a monitoring program. This section 3.1.1 of the Reporting Manual requires Hunter Water to report on aspects of its monitoring of Drinking Water quality to Customers.]
3.1.2 Monthly Fluoridation Report – Drinking Water

Hunter Water must submit a report on its fluoride monitoring to NSW Health for each month, which contains the information required by the Code of Practice for Fluoridation of Public Water Supplies. Hunter Water must submit the report within the first week of the following month.

[Note: Hunter Water must report on its fluoride monitoring on the basis that: (a) its performance programs must comply with monitoring requirements in the Code of Practice for the Fluoridation of Public Water Supplies, and (b) NSW Health has specified (as it is authorised to do under clause 3.1.1 of the Licence) that the monitoring and reporting of fluoridation in the Drinking Water Quality Management System must be consistent with the Code of Practice for the Fluoridation of Public Water Supplies.]

3.1.3 Quarterly Exception Report – Drinking Water and Recycled Water

Hunter Water must submit a report on its monitoring of the quality of Drinking Water and Recycled Water on an exception basis to NSW Health for each quarter starting from 1 July 2017. Hunter Water must submit the report within 6 weeks of the end of the quarter, even if there are no exceptions to report.

Each report must include the following information for the quarter:

• the details of any monitoring test result (Exception) that does not comply with:
  – the relevant guideline value for each Drinking Water quality characteristic (each as specified in the monitoring program developed as part of the Drinking Water Quality Management System), or
  – the relevant guideline value for each Recycled Water quality characteristic (each as specified in monitoring program developed as part of the Recycled Water Management System), and
  – the relevant critical control point breached and the action taken.

The details must include:

• test results and the date or period of non-compliance with the relevant guideline values

• an appraisal of the Exception, including a discussion of the extent and nature of the Exception and an analysis of the risks posed by the Exception, and

• an explanation of the causes of the Exception and any action taken to rectify it and prevent it from re-occurring.

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2 An exception is a test result that does not meet the guideline value for that water characteristic. A non-compliance occurs where the value for a water characteristic observed in testing does not satisfy the long term (12-month or longer) performance requirements set out in the Australian Drinking Water Guidelines or as determined by NSW Health.
[Note: As explained in the Note to section 3.1.1 above, Hunter Water must maintain and implement a Drinking Water Quality Management System in accordance with the Licence. Hunter Water must also maintain and implement a Recycled Water Quality Management System, i.e., a Management System that is consistent with the Australian Guidelines for Water Recycling (Licence, clauses 3.2.1 and 3.2.2). The Australian Guidelines for Water Recycling seek to provide a framework for good management of Recycled Water supply. To comply with the Licence, the Drinking Water Quality Management System and Recycled Water Quality Management System must each include a monitoring program. This section 3.1.3 requires Hunter Water to report on aspects of its monitoring of the quality of Drinking Water and Recycled Water under such monitoring programs.]

### 3.1.4 Annual compliance and performance reporting

Hunter Water must submit a compliance and performance report on its management of the quality of Drinking Water and Recycled Water to IPART for each financial year. The report must use the template in Appendix F of this Reporting Manual. Hunter Water must submit the report by 1 September after the end of the financial year, or at a later date agreed to by IPART.

The report must include:

- the Drinking Water and Recycled Water quality management activities and programs completed by Hunter Water in the financial year to meet its water quality objectives, including the results and outcomes from those activities and programs,

- the Drinking Water and Recycled Water quality management activities and programs proposed to be undertaken by Hunter Water to meet its water quality objectives in the future, including the expected outcomes, scope and timetable for completion,

- an assessment of the performance of critical control points (as identified by the Drinking Water Quality Management System and the Recycled Water Quality Management System) over the long-term in accordance with Chapter 10 of the Australian Drinking Water Guidelines or Element 11 of the Australian Guidelines for Water Recycling (as the case may be),

- an assessment of the review and continual improvement conducted over the previous 12-month period (as identified by the Drinking Water and Recycled Water Quality Management Systems) in accordance with Element 12 of the relevant Guideline,

- any changes made to the Drinking Water Quality Management System and/or the Recycled Water Quality Management System, and

- any non-compliance with a Water Quality Management System and the action(s) taken to resolve them, and
how Hunter Water has complied or not complied with the Water Pressure Standard, Water Continuity Standard and Wastewater Overflow Standard, including:
- major factors (both positive and negative) that have influenced Hunter Water’s performance, both within and beyond Hunter Water’s control, and
- reasons for any variation (both positive and negative) between Hunter Water’s performance in the financial year with performance in prior years.

Any change in the Area of Operations.

[Note: Under clauses 3.1.1, 3.1.2, 3.2.1 and 3.2.2, Hunter Water must maintain and implement a Drinking Water Quality Management System and Recycled Water Quality Management System. This section 3.1.4 requires Hunter Water to report on how it complies with this Licence condition.

The water quality objectives referred to in this section 3.1.4 are objectives that Hunter Water would need to identify for the Drinking Water Quality Management System and the Recycled Water Quality Management System. Hunter Water’s water quality objectives may be either:

- the broad objectives of the Drinking Water Quality Management System or Recycled Water Quality Management System (eg, to ensure consistent management of water quality). These objectives may cover all 12 elements of the Drinking Water Quality Framework or Recycled Water Quality Framework, such as monitoring, operation maintenance, training, community consultation and research programs; or
- the target water quality criteria (ie, operational water quality objectives) for each operational water quality characteristic included in the monitoring program developed as part of the Drinking Water Quality Management System or Recycled Water Quality Management System (eg, E.coli numbers in feeder streams or raw water).

The Drinking Water and Recycled Water Quality Management System activities and programs referred to in this section 3.1.4 are those that Hunter Water would identify in its risk assessments as actions or programs that are required to manage or maintain a risk below a tolerable level. Undertaking a risk assessment is part of the Drinking Water Quality Framework and Recycled Water Quality Framework, with which the Drinking Water Quality Management System and the Recycled Water Quality Management System (respectively) must be consistent.

Under clause 3.3 of the Licence, Hunter Water is required to comply with the System Performance Standards. This section 3.1.4 requires Hunter Water to report on how it complies with this Licence condition.]
3.2 ‘As required’ reporting

3.2.1 Incident and emergency reporting – Drinking Water and Recycled Water

Hunter Water must immediately report to NSW Health any incident in the delivery of its drinking water and recycled water services which may adversely affect public health.

Hunter Water must report the “incident” (as defined in a Water Quality Management System) in accordance with the reporting protocols developed in that necessary Water Quality Management System.

[Note: To comply with the Licence, the Drinking Water Quality Management System and the Recycled Water Management System should define “incidents” and include protocols for external communications and reporting of incidents. This section 3.2.1 requires Hunter Water to report these incidents in accordance with these protocols.]

3.2.2 Notification of significant changes to Water Quality Management Systems

Hunter Water must notify IPART and NSW Health of any significant changes that it proposes to make to the Drinking Water and Recycled Water Quality Management Systems.

3.2.3 Customer survey report

Hunter Water must provide a customer survey report by 31 December 2020 that provides information to inform a potential review of System Performance Standards.

3.3 Publicly available documents

Hunter Water must make:

- the Monthly Water Quality Monitoring Report, and
- the annual compliance and performance report on Drinking Water and Recycled Water quality management (referred to in section 3.1.4 of this Reporting Manual),

available free of charge:

- on its website for downloading by any person, and
- at its offices for access or collection by any member of the public.
4 Organisational systems management

This section sets out Hunter Water’s reporting obligations for clause 4 of the Licence.

4.1 ‘Periodic’ reporting

4.1.1 Annual compliance and performance reporting

Hunter Water must submit to IPART a compliance and performance report on the following management systems:

- Asset Management System (AMS),
- Environmental Management System (EMS), and
- Quality Management System (QMS).

Hunter Water must submit the report by 1 September following the end of the financial year, or at a later date agreed to by IPART.

The report must include:

- the management activities and programs completed by Hunter Water in the financial year to meet the objectives of each management system,
- the results and outcomes from those activities and programs,
- the activities and programs proposed to be undertaken by Hunter Water to meet the objectives of each management system in the future, including the timetable for completion,
- any significant changes made to each management system, and
- any failures in each management system and the action taken to resolve them.

[Note: Hunter Water must maintain and implement:

- an AMS, ie, a Management System that is consistent with the standard specified in the licence (Licence, clauses 4.1.1 and 4.1.2);]
This section 4.1.1 requires Hunter Water to report on how it complies with these Licence condition. The objectives referred to in this section 4.1.1 are those that Hunter Water would need to identify for each Management System. The activities and programs referred to in this section 4.1.1 are those that Hunter Water would need to undertake to achieve the objectives of the each Management System.]

4.2 ‘As required’ reporting

4.2.1 AMS

Hunter Water must notify IPART:

- That it has developed a management system consistent with ISO 55001:2014. This is anticipated to be achieved by 31 December 2017.
- The date(s) of the certification audit and allow IPART to attend the audit. This is anticipated to be prior to 1 July 2018.
- That certification to ISO 55001:2014 has been achieved. Hunter Water must submit a copy of the certification and the Strategic Asset Management Plan. This is anticipated to be achieved by 1 July 2018.

4.2.2 EMS and QMS

Hunter Water must notify IPART once the EMS or the QMS have been transitioned to the new respective ISO standard. This is anticipated to be achieved by September 2018.

4.3 Publicly available documents

Hunter Water must make the compliance and performance report on its Management Systems (referred to in section 4.1.1 of this Reporting Manual) available free of charge:

- on its website for downloading by any person, and
- at its offices for access or collection by any member of the public.
This section sets out Hunter Water’s reporting obligations for clause 5 of the Licence.

5.1 ‘Periodic’ reporting

5.1.1 Annual compliance and performance reporting

Hunter Water must submit a compliance and performance report to IPART for each financial year on:

- Hunter Water’s performance against the performance indicators set out in Appendix B to Appendix E of this Reporting Manual for the financial year,
- Hunter Water’s analysis of any problems of a systemic nature arising from Hunter Water’s performance against those performance indicators, and
- Hunter Water’s performance against the National Water Initiative Performance Indicators in accordance with the National Framework for Reporting on Urban Water Utilities.

Hunter Water must submit the report by 1 September after the end of the financial year, or at a later date agreed to by IPART.

Hunter Water’s statement of compliance must be provided in accordance with IPART’s Public Water Utility Audit Guideline.

[Note: Under clause 5.2 of the Licence, Hunter Water must comply with its reporting obligations in this Reporting Manual. This section 5.1.1 requires Hunter Water to report on its performance against the performance indicators. IPART performance indicators maybe reviewed. IPART will update this Reporting Manual accordingly and notify stakeholders of the changes.

Under clause 5.3 of the Licence, Hunter Water must report to IPART the National Water Initiative Performance Indicators as outlined in the National Performance Frameworks: Urban performance reporting Indicators and definitions handbook.

Under clause 5.1 of the Licence, IPART may undertake an Operational Audit on Hunter Water’s compliance with the Licence. As part of the audit process, Hunter Water must provide a statement of compliance which identifies any non-compliance of which Hunter Water is aware.]
5.1.2 Annual audit recommendations status report

Hunter Water must report to IPART annually on the status of any audit recommendations identified in the most recent Operational Audit and outlined in IPART’s audit report to the Minister.

Hunter Water must submit the audit recommendations status report to IPART by 31 March each year (or at a later date agreed to by IPART).

Hunter Water may, but is not required to, report to IPART on the implementation of any opportunities for improvement identified in our report to the Minister on the results of the audit.

Hunter Water should provide this information with the status update on audit recommendations, if it chooses to report on opportunities for improvement. This information may be considered by an auditor in the subsequent annual audit.

[Note: Under clause 5.1 of the Licence, IPART or an Auditor may undertake an Operational Audit. This section 5.1.2 requires Hunter Water to report on the status of implementing recommendations identified in an Operational Audit.

IPART requirements for opportunities for improvement are set out in the Audit Guideline – Public Water Utilities.3]

5.2 ‘As required’ reporting

There is no ‘as required’ reporting requirement under this section 5 of this Reporting Manual.

5.3 Publicly available documents

Hunter Water is not required to make documents or reports publicly available under this clause 5 of the Reporting Manual.

[Note: IPART prepares an annual performance report on the public water utilities (including Hunter Water). The National Water Commission also prepares an annual national performance report of all urban water utilities (including Hunter Water). Both of these reports are publicly available.]

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3 IPART, Audit Guideline – Public Water Utilities, May 2016, Appendix D.
6 Customers and stakeholder relations

This section sets out Hunter Water’s reporting obligations for clause 6 of the Licence.

6.1 ‘Periodic’ reporting

6.1.1 Annual compliance and performance reporting

Hunter Water must submit a compliance and performance report on its Customer and Stakeholder Relations management to IPART for each financial year. Hunter Water must submit the report by 1 September after the end of the financial year, or at a later date agreed to by IPART.

The report must include:

- the activities of the customer advisory group in the financial year including:
  - the activities and achievements of the customer advisory group, and
  - compliance of the customer advisory group with the charter,
- any systemic problems arising from Complaints and the action taken to resolve them,
- any changes made to:
  - the Customer Contract,
  - the Procedure for Payment Difficulties and Actions for Non-Payment,
  - the customer advisory group charter,
  - the Internal Complaints Handling Procedure, and
  - the external dispute resolution scheme referred to in clause 6.6 of the Licence.

[Note: Under the Licence, Hunter Water must:

- maintain and implement a Procedure for Payment Difficulties and Actions for Non-Payment (Licence, clause 6.3)
- consult with its Customers and Consumers through a customer advisory group and maintain a customer advisory group charter (Licence, clause 6.4),]
6.1.1 requires Hunter Water to report on how it complies with these Licence conditions.

6.2 ‘As required’ reporting

Under clause 6.1.2 of the Licence, Hunter Water must provide IPART with a copy of the notice under section 38 of the Act, for the purpose of varying the terms and conditions of the Customer Contract.

6.3 Publicly available documents

Hunter Water must make the compliance and performance report on its Management Systems (referred to in section 6.1.1 of this Reporting Manual) available free of charge:

- on its website for downloading by any person, and
- at its offices for access or collection by any member of the public.
Appendices
## A Timeline for reporting

### Table A.1 ‘Periodic’ reporting under Hunter Water’s Licence

<table>
<thead>
<tr>
<th>Date</th>
<th>Report to</th>
<th>Required Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly</td>
<td>Public (web)</td>
<td>Drinking Water quality monitoring report</td>
</tr>
<tr>
<td>Monthly</td>
<td>NSW Health</td>
<td>Fluoride monitoring report</td>
</tr>
<tr>
<td>Quarterly</td>
<td>NSW Health</td>
<td>Exception report on Drinking and Recycled Water quality</td>
</tr>
<tr>
<td>31 March</td>
<td>IPART</td>
<td>Audit recommendation status update</td>
</tr>
<tr>
<td>1 September</td>
<td>IPART</td>
<td>Compliance and performance report on:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Management of the quality of Drinking Water and Recycled Water</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Water conservation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- System Performance Standards</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Asset, Environmental and Quality Management Systems</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Performance indicators</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- NWI indicators</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Significant changes made to processes, procedures and systems</td>
</tr>
<tr>
<td>IPART</td>
<td></td>
<td>First Water Conservation Report (2020)</td>
</tr>
<tr>
<td>IPART</td>
<td></td>
<td>Second Water Conservation Report (2021)</td>
</tr>
<tr>
<td>IPART</td>
<td></td>
<td>Third Water Conservation Report (2022)</td>
</tr>
</tbody>
</table>
### Table A.2  ‘As required’ reporting under Hunter Water’s licence

<table>
<thead>
<tr>
<th>Date</th>
<th>Report submitted to</th>
<th>Required Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 November 2017</td>
<td>IPART</td>
<td>Report on the approach and principles to developing its methodology for the determination of economic level of water conservation</td>
</tr>
<tr>
<td>31 December 2017</td>
<td>IPART</td>
<td>MoU with NSW Fire and Rescue</td>
</tr>
<tr>
<td>1 July 2018</td>
<td>IPART</td>
<td>Asset Management System certification and Strategic Asset Management Plan in accordance with ISO 55001:2014</td>
</tr>
<tr>
<td>September 2018</td>
<td>IPART</td>
<td>EMS and QMS re-certification</td>
</tr>
<tr>
<td>1 November 2018</td>
<td>IPART</td>
<td>Report setting out the methodology for the determination of economic level of water conservation</td>
</tr>
<tr>
<td>1 September 2019</td>
<td>IPART</td>
<td>Water Conservation Program developed using the economic level of water conservation methodology</td>
</tr>
<tr>
<td>31 December 2020</td>
<td>IPART</td>
<td>Customer Survey Report</td>
</tr>
<tr>
<td>As triggered</td>
<td>IPART</td>
<td>Proposed change in ELWC methodology</td>
</tr>
<tr>
<td>As triggered</td>
<td>NSW Health</td>
<td>Incident notification</td>
</tr>
<tr>
<td>As triggered</td>
<td>IPART, NSW Health</td>
<td>Proposed significant change in drinking and recycled water quality management systems</td>
</tr>
<tr>
<td>As triggered</td>
<td>IPART</td>
<td>Notice of change to Customer Contract</td>
</tr>
</tbody>
</table>
B  IPART performance indicators – water quality

The table in this appendix sets out the performance indicator required to be provided to IPART, as follows.
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>WQ 1(H)</td>
<td>Microbial compliance - Percentage of routine water quality samples that comply with the Australian Drinking Water Guidelines for <em>E.Coli</em></td>
</tr>
<tr>
<td></td>
<td>Chemical/physical compliance - Percentage of routine water quality samples that comply with the Australian Drinking Water Guidelines for key chemical/physical parameters</td>
</tr>
</tbody>
</table>
C IPART performance indicators – infrastructure

The tables in this appendix set out performance indicators required to be provided to IPART, as follows.
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>I 1</td>
<td>The number of properties affected by an unplanned water interruption duration of more than 1 hour and less than or equal to 5 hours.</td>
<td><strong>Property</strong> means any real property to which either or both of the following conditions apply: &lt;br&gt;a. the real property is connected to the water utility’s drinking water supply system, to the water utility’s sewerage system or to the water utility’s recycled water system and a charge for the services provided by one or more of those systems is levied on the owner of the real property; &lt;br&gt;b. the real property is within a declared stormwater drainage area for which the utility imposes a stormwater charge upon the owner of real property in that area. &lt;br&gt;<strong>Water Interruption</strong> means any event causing a total loss of water supply due to any cause. Water interruption excludes those caused by bursts or leaks in the service connection to internal plumbing or planned meter replacements. All interruptions not subject to notification caused by third parties or a power failure should be included. Exclude instances of reduced service levels due to, for example, low pressure. If a property experiences more than one interruption then it should be counted for each event. A water supply interruption, which causes loss of supply to 100 customers, is counted as 100 customer interruptions. &lt;br&gt;<strong>Planned water interruption</strong> – water interruption initiated by the water utility for which at least 24 hours’ notice has been given to the customer. &lt;br&gt;<strong>Unplanned water interruption</strong> means an interruption in which an occupier of a property has not received at least 24 hours notification of the interruption or an interruption that has occurred prior to the expiry of any notice provided to an occupier advising of an interruption. It also includes outages where the duration exceeds that originally notified. In this case the entire outage is classed as unplanned.</td>
</tr>
<tr>
<td>I 2</td>
<td>Occurrence of water interruptions to affected properties (ie, the number of properties experiencing 3 or more Planned and Unplanned water interruptions) of more than one hour duration.</td>
<td><strong>Property</strong> as per I 1.</td>
</tr>
<tr>
<td>I 3</td>
<td>Events leading to planned or unplanned water interruption where 250 or more properties experience an interruption of over 5hrs duration.</td>
<td><strong>Planned water interruption</strong> as per I 1</td>
</tr>
<tr>
<td>I 4 (H)</td>
<td>The number of residential properties affected by planned water supply interruptions in peak hours (5am - 11pm).</td>
<td><strong>Notes:</strong></td>
</tr>
</tbody>
</table>

**Notes:**
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| 15                  | The number of properties in the utility’s drinking water supply network experiencing a water pressure failure which is occasional or recurrent, but not permanent. | 1. For the purpose of this indicator, property refers to only residential properties.  
2. Interruptions spanning any part of the peak period are to be included. |
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| I 6                 | Number of High Priority sewage overflows per 100 km of sewer main responded to in a year. | **High Priority** sewage overflow is an event assessed by the water utility as:  
(a) a public health concern  
(b) likely to amount to significant damage to property  
(c) likely to have a significant environmental impact  
(d) an interruption of the sewerage service.  
**Medium Priority** sewage overflow is an event assessed by the water utility as likely to amount to:  
(a) minor property damage  
(b) minor environmental impact (including unpleasant odours) not posing a significant health risk.  
The utility has defined problem codes of ‘sewerage surcharge’, ‘plumber confirmed choke’ or ‘internal surcharge’. The number of events to be used is the number recorded under these codes determined to be priority High or Medium jobs.  
**Note:** High Priority is equivalent to a Priority 6 for Sydney Water or Priority 1 for Hunter Water. Medium Priority is equivalent to a Priority 5 for Sydney Water or Priority 2 for Hunter Water. |
| I 7                 | Number of Medium Priority sewage overflows per 100 km of sewer main responded to in a year. | **High Priority** sewage overflow is an event assessed by the water utility as:  
(a) a public health concern  
(b) likely to amount to significant damage to property  
(c) likely to have a significant environmental impact  
(d) an interruption of the sewerage service.  
**Medium Priority** sewage overflow is an event assessed by the water utility as likely to amount to:  
(a) minor property damage  
(b) minor environmental impact (including unpleasant odours) not posing a significant health risk.  
The utility has defined problem codes of ‘sewerage surcharge’, ‘plumber confirmed choke’ or ‘internal surcharge’. The number of events to be used is the number recorded under these codes determined to be priority High or Medium jobs.  
**Note:** High Priority is equivalent to a Priority 6 for Sydney Water or Priority 1 for Hunter Water. Medium Priority is equivalent to a Priority 5 for Sydney Water or Priority 2 for Hunter Water. |
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>I 8</td>
<td>Number of residential customers' dwellings affected by sewer spills not contained within 1 hour of notification.</td>
<td><strong>Residential customer</strong> means a customer who: owns real property which is used as a principal place of residence. <strong>Property</strong> as per I 1. <strong>Sewer spills</strong> refers to a sewer spill caused by a fault in the water utility's sewerage system that discharges to a customer's dwelling. It does not include spills caused by faults in the service connection or house connection branch and the house service line. <strong>Contained</strong> means the sewage spill has ceased or has been alleviated. It does not include sewer spills caused by faults or blockages in the customer’s pipes.</td>
</tr>
</tbody>
</table>
D IPART performance indicators - environment

The tables in this appendix set out performance indicators required to be provided to IPART, as follows.
### Table D.1 Performance Indicators – Environment

<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| E 1                 | Total number of proceedings and Penalty Notices under the *Protection of the Environment Operations (POEO) Act 1997* issued to the water utility. | **Proceedings** refers to proceedings in connection with the POEO Act for prescribed offences. **Penalty Notice** is a notice to the effect that, if the person served with the notice does not wish to have a specified penalty offence dealt with by a court, the person may pay the penalty prescribed under section 227 for the offence:  
*Note for E2* - this indicator refers to penalty notices which contractors inform the water utility were incurred whilst they were conducting works for the corporation. Each breach notice will be reported on the date that the contractor informed the water utility, not on the date the penalty was incurred or the date the notice was issued to the contractor. |
| E 2                 | Total number of proceedings and Penalty Notices under the *Protection of the Environment Operations (POEO) Act 1997* issued to contractors engaged by the water utility. |  |
| E 3                 | Total electricity consumption by water assets (kWh/ML of water supplied to be included). | **Water supplied** is the total metered volume of water (potable or non-potable) supplied to customers over the reporting period plus estimated non-metered water supplied. This comprises the sum of residential water supplied, commercial, municipal and industrial water supplied and other water supplied (includes estimated non-metered water supplied). It includes recycled water and urban stormwater used but excludes agricultural irrigation, environmental water and managed aquifer recharge.  
**Sewage treated** is the total volume of sewage collected by the water utility, measured as treatment plant inflow, plus sewage treated by another business on behalf of the water utility eg, wholesaler. This measure should equal the sum of volumes reported for residential, non-residential and non-trade waste collected and trade waste collected.  
**Renewable energy** is electricity sourced from non-fossil fuel sources. |
| E 4                 | Total electricity consumption by sewer assets (KWh/ML of sewage collected). |  |
| E 5                 | Electricity consumption from renewable sources or generated by the water utility expressed as a percentage of total electricity consumption. |  |
| E 6                 | Total mass of biosolids produced by the water utility. | **Biosolids** means the stabilised organic solids derived from sewage treatment processes.  
**Total Mass** means the quantity in dry tonnes of biosolids captured and removed from sewage treatment plants. |
<table>
<thead>
<tr>
<th>E 7</th>
<th>Percent of solid waste recycled or reused expressed as a percentage of solid waste generated.</th>
</tr>
</thead>
<tbody>
<tr>
<td>E 8</td>
<td>Total area of clearing of native vegetation.</td>
</tr>
<tr>
<td>E 9</td>
<td>Total area of native vegetation rehabilitated.</td>
</tr>
<tr>
<td>E 10</td>
<td>Total area of native vegetation gain due to rehabilitation, replanting and protection by the water utility.</td>
</tr>
</tbody>
</table>

**Definitions**

**Solid Waste** is any solid substance that is discarded, rejected, unwanted, in surplus or abandoned. It does not include gas, energy, water, wastewater, biosolids diverted for beneficial reuse and reuse water.

**Recycled** means the conversion of waste materials into a usable product or resource. The process of recycling includes the diversion or extraction of the material from the waste stream; the collection and sorting of recyclable materials; and the processing of those materials into products which can then be used (or sold for use). Materials are deemed to have been recycled when they are transferred to a facility for processing or manufacturing (e.g., a recycling centre). Energy recovery (or waste-to-energy) is another form of recycling, which involves recovery of latent energy rather than a physical resource.

**Re-use** is the application of a diverted waste product to a subsequent use which may be the same or different from the original purpose, and which extends the life of the product, but without further manufacture. Beneficial re-use is generally taken to mean that the form of re-use delivers some benefit (economic, social or environmental).

**Native vegetation indicators** will be an estimate based on the production of the water utility's Environmental Management Plans and documents, or triggered by Flora and Fauna studies. It will only be reported above 0.01 Hectares.

**The definition of Native Vegetation** will be derived from the *Native Vegetation Act 2003* (NV Act). The Objects of the NV Act provide guidance as to what needs to be considered when assessing whether an area will be included in the vegetation loss figures.

**Note:** Indicator will include works undertaken by or on behalf of the water utility on land that is not owned by the water utility, such as offsetting impacts to one area by rehabilitation or replanting at another site.
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| E 11               | Total number and nature of proceedings or Penalty Notices of conditions under licences issued to the water utility by NOW for water management. | **Proceedings** refers to proceedings in connection with the Water Management Act for prescribed offences.  
**Penalty notice** means a notice to the effect that, if the person served with the notice does not wish to have an alleged offence dealt with by a court, the person may pay, in accordance with the notice, the penalty specified in the notice.  
**NOW** means the NSW Office of Water. |
E  IPART performance indicators - customers

The tables in this appendix set out performance indicators required to be provided to IPART, as follows.
### Table E.1 Performance Indicators – Customers

<table>
<thead>
<tr>
<th>Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| C 1           | The percentage of complaints resolved within 10 business days. | **Complaint** is defined in AS ISO 10002:2014 or the most recent up-date version of that standard. This standard defines a complaint as an expression of dissatisfaction made to an organisation, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected. The following examples are intended to provide some clarity to this definition.  
- A contact requesting information is not a complaint.  
- A contact reporting a service difficulty or fault is not a complaint and these contacts are recorded separately.  
- A contact expressing dissatisfaction with repeat service difficulties and faults is a complaint.  
- A contact where a credit adjustment on the account has been made due to a meter misread is a complaint.  
- A contact that results in a water quality issue is a complaint (ie, due to particles, discolouration, smell, taste, or a health issue).  
- A contact that results from an internal sewage overflow is a complaint.  
- Any Civil actions taken through a court for loss or damage arising from the water utility’s performance under the Customer Contract is a complaint.  
- Complaints regarding repeat service difficulties or faults where they are from separate customers arising from the same cause, are counted as separate complaints.  
- More than one complaint from the same customer arising from the same cause are reported separately.  
- A complaint that is registered with EWON is a corporation complaint.  
- A contact regarding a matter that is not the responsibility of the Corporation is not recorded as a complaint.  
- A contact regarding flooding the water utility’s Stormwater is considered to be a complaint.  

**Resolution** of a complaint means that:
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
|                     |                 | a. the complaint is resolved to a customer’s satisfaction, or  
b. the customer is provided with an explanation as to why no further action is  
proposed in relation to the complaint, or  
c. the customer is provided with a date when the issue will be resolved if the  
complaint is relating to future planned operational or capital works. |
| C 2                 | Percent of calls abandoned |  |
| C 3                 | Percent of metered accounts of customers that receive  
a bill not based on a business meter read for one year. |  |
| C 4                 | The total number of residential customers disconnected  
for non-payment of amounts owed to the water utility. |  |
| C 5                 | The total number of non-residential customers  
disconnected for non-payment of amounts owed to the  
water utility. |  |
| C 6                 | Total number of residential customers on whom water  
flow restrictions have been imposed. |  |
| C 7                 | Total number of non-residential customers on whom  
water flow restrictions have been imposed. |  |

**Definitions**

**Customer** means any person who is taken to have entered into a Customer Contract with the water utility.

A **metered account** refers to water usage metered account, which is billed based on volume. If a property has multiple meters and each metered account receives a separate bill based on a meter read, these should be reported as separate metered accounts for the purposes of this indicator. If a property has multiple meters and a single account is issued due to common ownership, the meters will also be treated as separate metered accounts for the purposes of this indicator.

A **customer meter read** is one, which is provided by the customer to the utility. A **business meter read** is one taken by the utility or its contractor.

**Residential customer** means a customer who owns real property which is used as a principal place of residence.

**Non-Residential customer** means all customers not classified as a residential Customer.

**Disconnection** means the stopping (either temporarily or permanently) of water supply to a customer’s property.

**Flow Restriction** means a direct intervention in the water supply system by the utility in order to reduce flow to a customer’s property.
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| C 8                 | Number of residential customers per 1000 residential properties experiencing financial difficulty who are being assisted through the water utility's hardship program or payment plans. | **Residential customer** as per C4. **Property** means any real property to which either or both of the following conditions apply:  
a. the real property is connected to the water utility's drinking water supply system, sewerage system or recycled water system and a charge for the services provided by one or more of those systems is levied on the owner of the real property;  
b. the real property is within a declared stormwater drainage area for which the water utility imposes a stormwater charge upon the owner of real property in that area.  
**Payment plan** is a plan for a residential customer experiencing payment difficulties to pay a retailer by periodic instalments, any amount payable by the customer. A payment plan must only include an arrangement in which the customer is paying off an arrears component (of any overdue amount) and must consist of at least three instalments. |
| C 9                 | Percentage of residential customers in C 8 who are:  
(a) not meeting ongoing water and sewerage costs (debt increasing)  
(b) covering ongoing water and sewerage costs (debt stable) and  
(c) covering ongoing costs and portion of arrears (debt reducing). | **Residential customer** as per C4. |
| C 10                | Percentage of residential customers in C 8 who pay by:  
(a) Payment plan, and  
(b) Centrepay. | **Residential Customer** as per C 4.  
**Payment plan** as per C 8.  
**Centrepay** is a service offered by Centrelink that allows customers to pay their water bills by having an amount deducted from their Centrelink payments and paid directly to the water utility. |
| C 11                | Break up by percentage of residential customers who no longer meet C 8 by exiting the water utility's hardship program or payment plans because:  
(a) they have paid off their outstanding debt, | **Flow restriction** as per C 4. |
### IPART Indicator No. 1

<table>
<thead>
<tr>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b) they have been flow restricted, and</td>
<td></td>
</tr>
<tr>
<td>(c) other</td>
<td></td>
</tr>
</tbody>
</table>
The following table is a template to be used for Hunter Water’s compliance and performance report to IPART on its management of the quality of Drinking Water and Recycled Water, as set out in section 3.1.4 of this Reporting Manual.

<table>
<thead>
<tr>
<th>ADWG Framework sub-element</th>
<th>Water quality objective</th>
<th>Activity/Program</th>
<th>Results/outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example: 4.1 – Operational procedures 7.2 – Employee training</td>
<td>Example: Consistent management of water quality</td>
<td>Example: Proceduralise the routine data analysis process and train staff in procedure</td>
<td>Example: All data analysts are trained in routine data analysis and respond consistently when new data arrives.</td>
</tr>
<tr>
<td>4.3 – Corrective action</td>
<td>pH target for specific WFP</td>
<td>pH buffering facilities at WFP to be installed</td>
<td>Project scheduled for completion in late 2012</td>
</tr>
</tbody>
</table>