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Amendment record

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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.

1.3 Structure of this Reporting Manual

This Reporting Manual is structured as follows:

- Section 1 details how Hunter Water is to report and provides 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 Appendix A.

¹ Clause 6.2.1 of the Licence.
1.4 Changing this Reporting Manual

At times 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 Appendix A. We have grouped reporting requirements into:

- ‘periodic’ reporting (ie, monthly, quarterly, annual etc), and
- ‘as required’ reporting (ie, once-off report as required under the Licence, or report when certain events are triggered).

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 (eg, 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
Level 15, 2-24 Rawson Place
Sydney NSW 2000

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.

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.
2 Water conservation

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

2.1 Periodic reporting

2.1.1 Annual reporting - Water conservation work program

Hunter Water must submit a report on their progress against the water conservation work program developed using the Water Conservation Strategy and the approved Economic Level of Water Conservation Methodology to IPART, by 1 September 2019 and annually thereafter.

The report must:

- describe and explain Hunter Water’s progress against implementation (or otherwise) of water conservation activities for the previous financial year
- include, for water conservation activities upstream of Hunter Water’s water treatment plants, for the next five financial years:
  - Hunter Water’s strategies, programs and projects relating to Water Storage and Transmission
  - options identified for conserving water within system operating arrangements
  - comparison of these options, and
  - options selected for implementation,
- include, for water conservation activities within and downstream of Hunter Water’s water treatment plants, for the next five financial years:
  - Hunter Water’s strategies, programs and projects relating to water leakage, recycled water and water efficiency
  - Hunter Water’s water conservation objectives, targets and timetables, and
  - the extent to which these elements align with the Economic Level of Water Conservation Methodology
- describe and explain any changes to the water conservation activities, relative to the water conservation activities identified in the previous annual report
- outline how Hunter Water’s water conservation activities relate to the Lower Hunter Water Plan, and
- 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 by 1 September 2019, (b) expects that the annual report prepared by 1 September 2019 will capture water conservation activities implemented after the development of the Water Conservation Strategy and the approved Economic Level of Water Conservation Methodology, which do not necessarily cover the full financial year, and (c) anticipates that the five year plan set out in the annual report in September 2019 may be subject to change as the Water Conservation Strategy or the Economic Level of Water Conservation Methodology becomes more established.]

2.1.2 Annual compliance and performance reporting - Water Conservation Target

Until IPART approves the new Economic Level of Water Conservation Methodology, Hunter Water must submit a report on their compliance and performance with the Water Conservation Target by 1 September, annually.

The report must include:

▼ Hunter Water’s compliance with the Water Conservation Target (refer to Licence clause 2.2.1)

▼ 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

▼ 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 Licence clause 2.2.1, Hunter Water must continue to report on its compliance with the Water Conservation Target until the Economic Level of Water Conservation Methodology is approved and program is developed. This section 2.1.2 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.

2.2 As required reporting

2.2.1 Economic Level of Water Conservation Principles and Approach

Hunter Water must submit to IPART its Economic Level of Water Conservation Principles and Approach for approval by IPART by 1 November 2017, or by a later date as approved by IPART.

2.2.2 Economic Level of Water Conservation Methodology

Hunter Water must submit to IPART its Economic Level of Water Conservation Methodology for approval by 1 November 2018, or by a later date as approved by IPART.

2.2.3 Water Conservation Strategy for Water Storage and Transmission

Hunter Water must submit to IPART its Water Conservation Strategy for Water Storage and Transmission to IPART by 1 November 2018, or by a later date as approved by IPART.

2.2.4 Water conservation work program

Hunter Water must submit to IPART its water conservation work program to IPART by 1 September 2019, or by a later date as approved by IPART. The water conservation work program must be developed using the process set out in the Water Conservation Strategy and the approved Economic Level of Water Conservation Methodology. The water conservation work program should set out for the next five financial years:

- for ‘catchment to water treatment plants’:
  - Hunter Water’s strategies, programs and projects relating to Water Storage and Transmission
  - options identified for conserving water within system operating arrangements
  - comparison of these options, and
  - options selected for implementation, and

- for ‘water treatment plants to tap’:
  - Hunter Water’s strategies, programs and projects relating to water leakage, recycled water and water efficiency
  - Hunter Water’s water conservation objectives, targets and timetables, and
  - the extent to which these elements align with the Economic Level of Water Conservation Methodology
2.2.5 Changes to the approved Economic Level of Water Conservation Methodology

Hunter Water must obtain IPART’s written consent to make any changes to the Economic Level of Water Conservation (other than changes to correct minor grammatical or typographical errors).

2.3 Publicly available documents

Hunter Water must make the annual report on the water conservation program (referred to in sections 2.1.1 and 2.1.2 of this Reporting Manual) available to any person, free of charge:

- on its website for downloading, and
- upon request through the General Enquiry Process.
3 Supply services and performance standards

This section sets out Hunter Water’s reporting obligations for Part 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 14th day of the following month.

[Note: Under Licence clauses 3.1.1 and 3.1.2, 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 by the 7th day 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 Licence clause 3.1.1) 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\(^2\) basis to NSW Health for each quarter starting from 1 July 2017. Hunter Water must submit the report by the 14th day of the second month following 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.

[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, ie, 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.]

\(^2\) 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.
3.1.4 Annual compliance and performance reporting – Drinking water and Recycled water quality management

Hunter Water must submit a compliance and performance report on its Drinking Water and Recycled Water Quality Management Systems 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 significant changes made to the Drinking Water Quality Management System and/or the Recycled Water Quality Management System, and
- any non-conformances with a Water Quality Management System and the action(s) taken to resolve those non-conformances.

[Note: Under Licence 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 (e.g., 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 (i.e., 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 (e.g., 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.

3.1.5 Annual compliance and performance reporting – System performance standards

Hunter Water must submit a compliance and performance report on its management of the performance standards to IPART for each financial year on:

- 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.

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.

[Note: Under Licence clause 3.3, Hunter Water is required to comply with the System Performance Standards. This section 3.1.5 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 30 June 2020 that provides information to inform a potential review of System Performance Standards and rebates.

3.3 Publicly available documents

Hunter Water must make:

- the Monthly Water Quality Monitoring Report – Drinking Water (referred to in section 3.1.1 of this Reporting Manual), 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
- upon request through the General Enquiry Process.
4 Organisational systems management

This section sets out Hunter Water’s reporting obligations for Part 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 major non-conformities 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);
- an EMS, ie, a Management System that is consistent with the standard specified in the licence (Licence, clauses 4.2.1 and 4.2.3); and
- a QMS, ie, a Management System that is consistent with the standard specified in the licence (Licence, clauses 4.3.1 and 4.3.3).

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 Strategic asset management plan

Hunter Water must submit a copy of its Strategic Asset Management Plan to IPART by 1 July 2018, once the Asset Management System is fully implemented as per Licence clause 4.1.2.

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
- upon request through the General Enquiry Process.
5 Customers and stakeholder relations

This section sets out Hunter Water’s reporting obligations for Part 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 on its Customer and stakeholder relations 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 with the Customer Advisory Group Charter,

- any systemic problems arising from Complaints and the action taken to resolve them, and

- 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 Licence clause 5.6.

[Note: Under the Licence, Hunter Water must:

- maintain and implement a Procedure for Payment Difficulties and Actions for Non-payment (Licence clause 5.3)
- consult with its Customers through a customer advisory group and maintain a Customer Advisory Group Charter (Licence clause 5.4),
- maintain and implement an Internal Complaints Handling Procedure (Licence clause 5.5), and
- be a member of the external dispute resolution scheme (Licence clause 5.6).]
5.2 As required reporting

Under Licence clause 5.1.2, 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.

5.3 Publicly available documents

Hunter Water must make the documents referred to in Licence clause 5.7.2 available free of charge:
- on its website for downloading by any person, and
- upon request through the General Enquiry Process.
6  Performance monitoring and reporting

This section sets out Hunter Water’s reporting obligations for Part 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 to IPART by **1 September** after the end of the financial year, or at a later date agreed to by IPART, on:

- Hunter Water’s performance against the IPART 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 IPART 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.

[Note: Under Licence clause 6.2, Hunter Water must comply with its reporting obligations in this Reporting Manual. This section 6.1.1 requires Hunter Water to report on its performance against the performance indicators.

Under Licence clause 6.2.1(e)(i), Hunter Water must report to IPART the IPART performance indicators. IPART performance indicators maybe reviewed. We will update this Reporting Manual accordingly and notify stakeholders of the changes.

Under Licence clause 6.2.1(e)(ii), 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.]

6.1.2  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 Licence clause 6.1, IPART or an Auditor may undertake an Operational Audit. This section 6.1.2 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

6.1.3 Significant changes

Hunter Water must submit to IPART by 31 March each year a report on any significant changes that have been made from 1 July the previous year to the:

- Drinking Water Quality Management System
- Recycled Water Quality Management System
- Asset Management System
- Environmental Management System, and
- Quality Management System.

[Note: Under the Licence, Hunter Water is required to develop and implement Management Systems referred to in Licence clauses 3.1, 3.2, 4.1, 4.2 and 4.3. This section 6.1.3 requires Hunter Water to report on any significant changes to these systems, over the first nine months of the financial year, to inform the scope of the Operational Audit. The full year reporting requirements on Management Systems are provided in sections 3.1.4 and 4.1.1.]

6.1.4 Statement of compliance

Hunter Water must submit a statement of compliance to IPART by 1 September each year in accordance with IPART’s Public Water Utility Audit Guideline.

[Note: Under Licence clause 6.1, 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.]

6.2 As required reporting

There is no as required reporting requirement under section 6 of this Reporting Manual.

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3 IPART, Audit Guideline – Public Water Utilities, May 2016, Appendix D.
6.3 Publicly available documents

Hunter Water is not required to make documents or reports publicly available under this section 6 of the Reporting Manual.

[Note: IPART prepares an annual performance report on the public water utilities (including Hunter Water). The Bureau of Meteorology also prepares an annual national performance report of all urban water utilities (including Hunter Water). Both of these reports are publicly available.]
Appendices
## A Timeline for reporting

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

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<td>31 March</td>
<td>IPART</td>
<td>Significant changes report</td>
<td>6.1.3</td>
</tr>
<tr>
<td>1 September</td>
<td>IPART</td>
<td>Annual report on:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Water conservation</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Supply services and performance standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Organisational systems management</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Customer and stakeholder relations</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>IPART performance indicators</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>NWI Performance Indicators</td>
<td></td>
</tr>
<tr>
<td>1 September</td>
<td>IPART</td>
<td>Statement of Compliance</td>
<td>6.1.4</td>
</tr>
</tbody>
</table>

### Table A.2 As required reporting under Hunter Water’s Licence and reporting manual

<table>
<thead>
<tr>
<th>Date</th>
<th>Reporting to</th>
<th>Reporting on</th>
<th>Reporting Manual Section</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 November 2017</td>
<td>IPART</td>
<td>Approach and principles to developing its Economic Level of Water Conservation Methodology</td>
<td>2.2</td>
</tr>
<tr>
<td>1 July 2018</td>
<td>IPART</td>
<td>Strategic Asset Management Plan</td>
<td>4.2.1</td>
</tr>
<tr>
<td>1 November 2018</td>
<td>IPART</td>
<td>Economic Level of Water Conservation Methodology</td>
<td>2.2</td>
</tr>
<tr>
<td>1 November 2018</td>
<td>IPART</td>
<td>Water Conservation Strategy for Water Storage and Transmission</td>
<td>2.2</td>
</tr>
<tr>
<td>1 September 2019</td>
<td>IPART</td>
<td>Water conservation work program</td>
<td>2.2.4</td>
</tr>
<tr>
<td>30 June 2020</td>
<td>IPART</td>
<td>Customer Survey Report</td>
<td>3.2.3</td>
</tr>
<tr>
<td>As triggered</td>
<td>IPART</td>
<td>Obtain written consent to make changes to the approved Economic Level of Water Conservation Methodology</td>
<td>2.2</td>
</tr>
<tr>
<td>As triggered</td>
<td>NSW Health</td>
<td>Drinking Water and Recycled Water Incident and emergency notification</td>
<td>3.2.1</td>
</tr>
<tr>
<td>As triggered</td>
<td>IPART, NSW Health</td>
<td>Notification of proposed significant change in drinking and recycled water quality management systems</td>
<td>3.2.2</td>
</tr>
<tr>
<td>As triggered</td>
<td>IPART</td>
<td>Notice of variation to Customer Contract</td>
<td>5.2</td>
</tr>
</tbody>
</table>
B IPART performance indicators – water quality

The table in this appendix sets out the performance indicator required for water quality to be provided to IPART, as follows.

Table B.1 Performance Indicators – Water Quality

<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>
The table in this appendix set out performance indicators required to be provided to IPART, as follows.

**Table C.1 Performance Indicators - Infrastructure**

<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
</table>
| I 1                 | The number of properties affected by an unplanned water interruption duration of more than 1 hour and less than or equal to 5 hours. | **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, 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;  
  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.  
**Note:** WIC Act Licensee’s end-use customers are not considered to be **Properties** for the purposes of reporting performance against IPART performance indicators. **Water Interruption** 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. **Planned water interruption** – water interruption initiated by the water utility for which at least 24 hours’ notice has been given to the customer. **Unplanned water interruption** 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 outside the period 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. |
| I 2                 | Occurrence of water interruptions to affected properties (ie, the number of properties experiencing three or more Planned or Unplanned water interruptions) of more than one hour duration). | |
| I 3                 | Events leading to planned or unplanned water interruption where 250 or more properties experience an interruption of over 5hrs duration. | **Planned water interruption** as per I 1. **Unplanned water interruption** as per I 1. **Notes:**  
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. |
| I 4 (H)             | The number of residential properties affected by planned water supply interruptions in peak hours (5am -11pm). | **Property** as per I 1. **Planned water interruption** as per I 1. **Notes:**  
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 5                 | 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. | **Property** as per I 1. A property experiences a **water pressure failure** if a pressure of less than **20 metres** head is experienced for a continuous period of **30 minutes** or more measured at the point of connection of the property to the water supply system (usually at the point of connection known as the 'main tap'), but does not include a situation in which the property experiences low water pressure on a day when peak day demand exceeds **370 megalitres per day**. For the purpose of this indicator: 
  a) where connected properties are in multiple occupancy, each separately billed or occupied part shall be counted as one connected property. Connected properties currently unoccupied shall be included.  
  b) a Property is taken to have experienced a water pressure failure at each of the following times:  
     (i) when a person notifies the water utility that the Property has experienced a water pressure failure and that water pressure failure is confirmed by the water utility; or  
     (ii) when the water utility’s systems identifies that the Property has experienced a water pressure failure; and  
  c) a property will not be taken to have experienced a water pressure failure if that water pressure failure occurred only because of:  
     (i) a planned water interruption or unplanned water interruption;  
     (ii) water usage by authorised fire authorities in the case of a fire; or  
     (iii) a short term or temporary operational problem (such as a main break) which is remedied within 4 days of its occurrence. **Occasional or recurrent, but not permanent water pressure failure** includes one off failure sites. Properties with a **permanent low water pressure failure** refers to properties that record a failure for every day of the year and is calculated through the water utility’s system modelling. |
<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. |  |
| I 8                 | Number of residential customers’ dwellings affected by sewer spills not contained within 1 hour of notification. | **Residential customer** means a customer who: owns real property which is used as a principal place of residence.  
**Property** as per I 1.  
**Note:** WIC Act Licensee’s end-use customers are not considered to be **Properties** for the purposes of reporting performance against IPART performance indicators.  
**Sewer spills** 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.  
**Contained** 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. |
### Table D.1 Performance Indicators - Environment

<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>E 1</td>
<td>Total number of proceedings and Penalty Notices under the Protection of the Environment Operations (POEO) Act 1997 issued to the water utility.</td>
<td><strong>Proceedings</strong> refers to proceedings in connection with the POEO Act for prescribed offences. <strong>Penalty Notice</strong> 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. <strong>Note for E 2</strong> - 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.</td>
</tr>
<tr>
<td>E 2</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>E 3</td>
<td>Total electricity consumption by water assets (kWh/ML of water supplied to be included).</td>
<td><strong>Water supplied</strong> 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.</td>
</tr>
<tr>
<td>E 4</td>
<td>Total electricity consumption by sewer assets (KWh/ML of sewage collected).</td>
<td></td>
</tr>
<tr>
<td>E 5</td>
<td>Electricity consumption from renewable sources or generated by the water utility expressed as a percentage of total electricity consumption.</td>
<td><strong>Sewage treated</strong> 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. <strong>Renewable energy</strong> is electricity sourced from non-fossil fuel sources.</td>
</tr>
<tr>
<td>E 6</td>
<td>Total mass of biosolids produced by the water utility.</td>
<td><strong>Biosolids</strong> means the stabilised organic solids derived from sewage treatment processes. <strong>Total Mass</strong> means the quantity in dry tonnes of biosolids captured and removed from sewage treatment plants.</td>
</tr>
<tr>
<td>Indicator No.</td>
<td>Indicator detail</td>
<td>Definitions</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>E 7</td>
<td>Percent of solid waste recycled or reused expressed as a percentage of solid waste generated.</td>
<td><strong>Solid Waste</strong> 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. <strong>Recycled</strong> 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 (eg, 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. <strong>Re-use</strong> 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).</td>
</tr>
<tr>
<td>E 8</td>
<td>Total area of clearing of native vegetation.</td>
<td>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 <em>Native Vegetation Act 2003</em> (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. <strong>Note:</strong> 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. This is to be reported on a financial year basis only. Planned rehabilitation or clearing works are not to be included until such time as the works are completed.</td>
</tr>
<tr>
<td>E 9</td>
<td>Total area of native vegetation rehabilitated, including due to replanting and protection by the water utility.</td>
<td></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>
<td></td>
</tr>
<tr>
<td>E 11</td>
<td>Total number and nature of proceedings or Penalty Notices of conditions under licences issued to the water utility by DPI Water for water management.</td>
<td><strong>Proceedings</strong> refers to proceedings in connection with the Water Management Act for prescribed offences. <strong>Penalty notice</strong> 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. DPI Water means the Department of Primary Industry Water.</td>
</tr>
</tbody>
</table>
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>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>C 1</td>
<td>The percentage of complaints resolved within 10 business days.</td>
<td>Complaint is defined in AS/NZS 10002:2014 or the most recent up-to-date version of that standard. This standard defines a complaint as an “expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”. The following examples are intended to provide some clarity to this definition.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact requesting information is not a complaint.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact reporting a service difficulty or fault is not a complaint and these contacts are recorded separately.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact expressing dissatisfaction with repeat service difficulties and faults is a complaint.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact where a credit adjustment on the account has been made due to a meter misread is a complaint.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact that results in a water quality issue is a complaint (ie, due to particles, discolouration, smell, taste, or a health issue).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact that results from an internal sewage overflow is a complaint.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ 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.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ Complaints regarding repeat service difficulties or faults where they are from separate customers arising from the same cause, are counted as separate complaints.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ More than one complaint from the same customer arising from the same cause are reported separately.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A complaint that is registered with EWON is a corporation complaint.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact regarding a matter that is not the responsibility of the Corporation is not recorded as a complaint.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ A contact regarding flooding the water utility’s Stormwater system is considered to be a complaint.</td>
</tr>
<tr>
<td>Resolution of a complaint means that:</td>
<td></td>
<td>▼ the complaint is resolved to a customer’s satisfaction, or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ the customer is provided with an explanation as to why no further action is proposed in relation to the complaint, or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>▼ 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.</td>
</tr>
<tr>
<td>Note: A complaint made by an end-use customer of a WIC Act Licensee, that mistakes Hunter Water as its network operator and/or retail supplier is not included in this indicator.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IPART Indicator No.</td>
<td>Indicator detail</td>
<td>Definitions</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>C 2</td>
<td>Percent of calls abandoned</td>
<td><strong>Customer</strong> means any person who is taken to have entered into a Customer Contract with the water utility. A <strong>metered account</strong> 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 <strong>customer meter read</strong> is one, which is provided by the customer to the utility. A <strong>business meter read</strong> is one taken by the utility or its contractor.</td>
</tr>
<tr>
<td>C 3</td>
<td>Percent of metered accounts of customers that receive a bill not based on a business meter read for one year.</td>
<td><strong>Residential customer</strong> means a customer who owns real property which is used as a principal place of residence. <strong>Non-Residential customer</strong> means all customers not classified as a residential customer. <strong>Note:</strong> WIC Act Licensee’s end-use customers are not considered to be customers for the purposes of reporting performance against IPART performance indicators.</td>
</tr>
<tr>
<td>C 4</td>
<td>The total number of residential customers disconnected for non-payment of amounts owed to the water utility.</td>
<td><strong>Disconnection</strong> means the stopping (either temporarily or permanently) of water supply to a customer’s property. <strong>Flow Restriction</strong> means a direct intervention in the water supply system by the utility in order to reduce flow to a customer’s property.</td>
</tr>
<tr>
<td>C 5</td>
<td>The total number of non-residential customers disconnected for non-payment of amounts owed to the water utility.</td>
<td></td>
</tr>
<tr>
<td>C 6</td>
<td>Total number of residential customers on whom water flow restrictions have been imposed.</td>
<td></td>
</tr>
<tr>
<td>C 7</td>
<td>Total number of non-residential customers on whom water flow restrictions have been imposed.</td>
<td></td>
</tr>
<tr>
<td>IPART Indicator No.</td>
<td>Indicator detail</td>
<td>Definitions</td>
</tr>
<tr>
<td>---------------------</td>
<td>------------------</td>
<td>-------------</td>
</tr>
</tbody>
</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.  
**Note:** WIC Act Licensee’s end-use customers are not considered to be customers for the purposes of reporting performance against IPART performance indicators.  
**Payment plan** is a plan for a residential customer experiencing payment difficulties to pay a retailer by periodic instalments, or 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.  
**Flow restriction** as per C 4. |
<table>
<thead>
<tr>
<th>IPART Indicator No.</th>
<th>Indicator detail</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>C 11</td>
<td>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, b) they have been flow restricted, and c) other.</td>
<td></td>
</tr>
</tbody>
</table>
F Drinking water and recycled water quality management system report template

The following table is a template to be used for Hunter Water to report on its Drinking Water and Recycled Water Quality Management Systems to IPART, as set out in section 3.1.4 of this Reporting Manual.

Table F.1 Management system report template

<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 2017</td>
</tr>
</tbody>
</table>