



Assessment of applications to vary
North Cooranbong scheme licences

Report to the Minister

November 2022

Water >>

Tribunal Members

The Tribunal members for this review are:

Carmel Donnelly PSM, Chair
Deborah Cope
Sandra Gamble

Enquiries regarding this document should be directed to a staff member:

Jamie Luke (02) 9290 8460

Sachin Singh (02) 9113 7784

The Independent Pricing and Regulatory Tribunal

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Acknowledgment of Country

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders, past, present and emerging.

We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

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1 Summary

We recommend that the Minister for Lands and Water^a (the Minister) grants:

- Altogether Cooranbong Pty Ltd (Altogether Cooranbong) a varied network operator licence (no. 15_033) (see Attachment A) and
- Altogether Group Pty Ltd (Altogether Group) a varied retail supplier licence (no. 13_001R) (see Attachment B).

We are not recommending any new licence conditions as the current licence conditions are appropriate for the additional proposed activities.

The varied licences, if granted,¹ will allow Altogether Cooranbong and Altogether Group to provide drinking water, recycled water and sewerage services to approximately 500 additional customers and add 4 additional end uses.

In assessing Altogether Cooranbong's application for a varied network operator licence and Altogether Group's application for a varied retail supplier licence, we considered the licensing criteria set out in sections 10(3) and 10(4) of the *Water Industry Competition Act 2006* (WIC Act) and had regard to the licensing principles in section 7(1) of the WIC Act.

The Minister must consider, but is not bound to accept, any advice or recommendation in this report in determining the licence application. The Minister may, if circumstances so require, seek further advice from us in relation to the licence application.

^a The Minister for Lands and Water administers the *Water Industry Competition Act 2006* (NSW).

2 Recommendations

We recommend that the Minister for Lands and Water:

1. Grant a varied network operator licence to Cooranbong Water (licence number 15_033), for the Cooranbong scheme subject to the conditions as set out in the attached draft licence.
2. Grant a varied retail supplier licence to Altogether Group (licence 13_001R) for the Cooranbong scheme, subject to the conditions as set out in the attached draft licence.

The Minister is required to provide us with a notice of the decision and of the reasons for the decision on whether or not to grant the licence.² We will make the information in the notice available to the public on our website, in accordance with the requirements of the WIC Act.³

3 Background

3.1 The applicants

We received applications to vary a network operator's and a retail supplier's licence from Altogether Cooranbong and Altogether Group on 17 May 2022.

Altogether Cooranbong has no employees and relies on the full support of Altogether Group to provide technical, financial and organisational capacity, under a Corporate Services Agreement. Altogether Group is the parent company of the Altogether group of companies. It has 7 subsidiaries (including Altogether Cooranbong) that hold 9 network operator licences. The proposed network operator licence retains Altogether Group as an Authorised Person to construct, operate and maintain recycled water infrastructure, consistent with the existing network operator licence.

Altogether Group's parent entity, Sustainable Communities Infrastructure Pty Ltd (SCI) is a special purpose vehicle with three shareholders, the New Zealand Superannuation Fund, the Commonwealth Superannuation Corporation (CSC) and MGIF SCIT PV Pty Ltd.

HRL Morrison & Co (Australia) Pty Ltd (Morrison & Co) manages SCI and the Sustainable Communities Infrastructure Trust (SCIT) on behalf of SCI's shareholders. Morrison & Co is an investment management fund, founded in 1988.

3.2 The scheme

The North Cooranbong scheme is in Cooranbong, NSW, in the City of Lake Macquarie local government area. The scheme is privately owned and provides drinking water, recycled water and sewerage services to the Watagan Park residential development. Altogether Cooranbong operates the scheme and maintains the water industry and sewage infrastructure within its licensed area of operation.

The scheme collects sewage from homes and businesses and treats the sewage to produce recycled water to be distributed back to homes and businesses through a recycled water reticulation network. It also supplies drinking water sourced from Hunter Water's drinking water network at the bulk supply point at Wainman Drive. The scheme has an ultimate capacity to provide drinking water, sewerage and recycled water services to residential, retail and commercial customers equivalent to 2,500 residential customers. It currently provides these services to approximately 600 residential customers. The scheme has been constructed to meet the ultimate capacity and will not require new treatment infrastructure if this licence variation is granted.

Altogether Cooranbong and Altogether Group have applied:

- to add new end uses for recycled water (general washdown, street cleaning and use of process water at the recycled water treatment plant), and

- to expand the network and retail licence area of operations to supply recycled water, drinking water and sewerage services to an additional 215 additional lots (approximately 500 new customers).

4 Consultation and submissions

On 17 June 2022, we provided the licence application to, and invited submissions from, the following Ministers⁴ and their relevant departments:

- Minister administering the WIC Act and Chapter 2 of the *Water Management Act 2000* (Minister for Lands and Water)⁵
- Minister administering the *Public Health Act 2010* (NSW) (Minister for Health)⁶
- Minister administering the *Protection of the Environment Operations Act 1997* (NSW) (POEO Act) (Minister for Energy and Environment)⁷
- Minister administering the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) (Minister for Planning).⁸

We invited Lake Macquarie City Council to make a submission as the local council and Hunter Water as the local public water utility. We also invited submissions on the application from the public.⁹ We advertised the application on our website on 17 June 2022. The closing date for submissions was 25 July 2022.

In addition to inviting submissions, we sought expert advice from Insurance & Care NSW (icare) to inform our assessment of appropriate insurance arrangements (see section 5.6).

We received 5 submissions from:

1. **NSW Health** advising that the management plans for drinking water, sewage and recycled water will need updating if details of the scheme change, including an assessment of the capacity of the systems to service the expanded area. NSW Health requested that the risk assessment is reviewed to ensure that the additional end uses are captured. This is discussed in section 5.5.
2. **The Minister for Environment** conveying that the Environment Protection Authority (EPA) is concerned that the additional end uses pose an unacceptable risk to the environment. This is discussed further in section 5.8.
3. **The Minister for Lands and Water** advising that a controlled activity approval, surface water access licence and a water supply work approval is not required under the *Water Management Act 2000* from the expansion of the North Cooranbong scheme.
4. **Hunter Water** stating that it does not have any concerns in relation to the applications. Also advised that there were no ongoing arrangements for Altogether to discharge excess recycled water into Hunter Water's infrastructure at the time of the application.^b This is discussed in section 5.8.
5. **A member of the public** claiming that Altogether Cooranbong's sewerage system is in breach of odour compliance. They also raised concerns relating to human and environmental impacts from recycled water. These are discussed further in section 5.8.

^b A formal agreement is now in place but was under negotiation during the consultation period.

5 Applications Assessment

This section of the report contains our assessment of Altogether Cooranbong's application for a varied network operator's licence and Altogether Group's application for a varied retail supplier's licence. It also contains our recommendations.

We considered the relevant licensing criteria set out in sections 10(3) and (4) of the WIC Act in assessing the applications ([Box 1](#)).

Box 1 Licensing criteria under section 10 of the WIC Act

(3) A licence may not be granted to:

- a. a disqualified corporation, or
- b. a corporation that is a related entity (within the meaning of the *Corporations Act 2001* of the Commonwealth) of a disqualified corporation, but only if the disqualified corporation would have a direct or indirect interest in, or influence on, the carrying out of the activities that the licence would authorise if granted.

(4) A licence may not be granted unless the Minister is satisfied as to each of the following:

- a. that the applicant has, and will continue to have, the capacity (including technical, financial and organisational capacity) to carry out the activities that the licence (if granted) would authorise,
- b. that the applicant has the capacity to carry out those activities in a manner that does not present a risk to public health,
- c. that the applicant has made, and will continue to maintain, appropriate arrangements with respect to insurance,
- d. in the case of an application for a licence to supply water, that, if such a licence is granted, sufficient quantities of the water supplied by the licensee will have been obtained otherwise than from a public water utility,
- e. such matters as are prescribed by the regulations,^c
- f. such other matters as the Minister considers relevant, having regard to the public interest.

^c Under the *Water Industry Competition (General) Regulation 2021* (WIC Regulation), section 7, the Minister must be satisfied that the applicant has the capacity to carry out the activities the licence, if granted, would authorise in a way that does not present a significant risk of harm to the environment.

We also had regard to the licensing principles in section 7(1)(a) of the WIC Act, which related to the protection of public health, the environment, public safety and consumers generally.

We consider that there have not been any material changes to how licensing principles section 7(1)(b) to (g) apply for the varied licences. Therefore, we consider analysis contained in the licence assessment report for the North Cooranbong scheme provided to the Minister in 2015 continues to apply.

Altogether Cooranbong relies fully on the support of Altogether Group staff and its systems under a Corporate Services Agreement to meet the licensing criteria. This includes technical, organisational and financial capacity. Therefore, we consider that Altogether Group's expertise is critical to Altogether Cooranbong's capacity. Where necessary we have considered information and evidence relevant to both Altogether Group and Altogether Cooranbong for the purpose of establishing Altogether Cooranbong's capacity. Altogether Group will remain as an Authorised Person on the varied network operator licence.

5.1 Disqualified corporation and related entity check

We consider that Altogether Cooranbong and Altogether Group are not a disqualified corporation or a corporation that is a related entity of a relevant^d disqualified corporation.

In making this recommendation, we have considered the following information:

- statutory declarations from Altogether Group and Altogether Cooranbong signed by the CEO and Director stating that:
 - Altogether Group and Altogether Cooranbong are not disqualified corporations within the meaning of the WIC Act, and
 - Altogether Group and Altogether Cooranbong are not related entities of a disqualified corporation that would have a direct or indirect interest in, or influence on, the carrying out of activities that the licence would authorise if granted
- information regarding details of the names of the Chief Financial Officer, Chief Executive Officer and Directors for Altogether Group and each of its relevant related entities.
- results of ASIC reports that we have obtained for Altogether Group, and for the related entities, confirmed that these companies are not disqualified corporations nor are the directors or persons concerned in the management of the companies' disqualified individuals.^e

Results of our search of the WIC Act licence database showed there are currently no disqualified corporations or individuals on the register pursuant to the WIC Act, sections 16(1)(e) and 16(1)(f).

^d A related entity that would have a direct or indirect interest in, or influence on, the carrying out of the activities that the licence, if granted, would authorise (WIC Act, section 10(3)(b)).

^e The relevant searches were completed on 12 October 2022

5.2 Technical capacity (licensing criterion (a))

We are satisfied that Altogether Cooranbong and Altogether Group have the technical capacity to undertake the proposed activities under the varied network operator licence and retail supplier licence.

Varied network operator licence

Previous technical experience. Altogether Cooranbong operates the North Cooranbong scheme, which commenced commercially operating in 2016. The scheme currently provides drinking water, recycled water and sewerage services within its designated area of operations. Altogether Group, which provides the operational support has 8 other schemes in NSW. We reviewed the position descriptions and professional experience of specific personnel nominated in the application. We consider that the expertise required by Altogether Cooranbong /Altogether Group personnel under a varied licence is not different to the expertise required under its current licence.

Compliance history. The North Cooranbong scheme has had a number of minor non-compliances identified in the 2021 operational audit. Altogether Cooranbong committed to a voluntary undertaking to rectify the identified non-compliances. The 2022 operational audit identified 2 minor non-compliances and found 17 of the 18 actions from the voluntary undertaking relating to the North Cooranbong scheme have been completed.¹⁰ The remaining action is in progress. There have been no incidents^f reported for this scheme in the 2021-2022 financial year. Altogether Cooranbong has reported non-compliances with their sampling and monitoring program. Several of Altogether Group's schemes were impacted by the service delivery of their external analytical provider. Altogether Group is now actively seeking to replace the service provider.¹¹

We are satisfied that Altogether Cooranbong has demonstrated its commitment to continued compliance.

Risk identification and management.¹² We reviewed the risk assessments for the scheme's water and sewage infrastructure and business systems. These document key hazards and risks and identifies control measures to manage these risks. For the purposes of this variation, we consider that the current risk assessment demonstrates Altogether Cooranbong has the technical capacity to ensure its infrastructure will be operated in a safe and reliable manner.

Management plans. Altogether Cooranbong uses the generic Altogether Group plans and a scheme specific plan. These plans outline how Altogether Cooranbong construct, operate and maintain the water industry infrastructure in accordance with the necessary standards and guidelines. The plans are:

- **Altogether Group drinking water quality plan (DWQP)**¹³ describes how the operation and maintenance of infrastructure for Altogether Group's drinking water schemes (including at North Cooranbong) would be consistent with the *Australian Drinking Water Guidelines* (ADWG).

^f As defined in the [WIC Act Reporting Manual](#).

- **Altogether Group recycled water quality plan (RWQP)**¹⁴ describes how the operation and maintenance of infrastructure for Altogether Group's recycled water schemes (including at North Cooranbong) would be consistent with the [Australian Guidelines for Water Recycling](#) (AGWR).
- **Altogether Group infrastructure operating plan (IOP)**¹⁵ describes the asset lifecycle planning, system redundancy, contingency plans and condition monitoring for water industry infrastructure, amongst other infrastructure management considerations.
- **Altogether Group sewage management plan (SMP)**¹⁶ describes the framework for the management of the (existing) scheme. The SMP is intended to supplement the RWQP, IOP, asset management plan, and incident management plan with scheme specific information. It includes scheme-specific details from relevant Altogether Group's plans (e.g. WQP and IOP) for the scheme recycled water infrastructure. It also addresses the requirements of Element 2 of the AGWR for the scheme specifically.

The plans were audited for adequacy (i.e. its consistency with the relevant guidelines) prior to the grant of commercial operation. The implementation of the plans is annually audited through a risk-based operational audit.

We consider that the plans and its implementation demonstrate Altogether Cooranbong's technical capacity to manage the operational activities that the varied licence will allow.

Varied Retail Supplier Licence

Previous technical experience. Altogether Group has provided retail services for the North Cooranbong scheme since it commenced commercially operating in 2016. Altogether Group has experience in the Australian water industry, preparing and implementing retail systems and procedures at existing operational schemes. Altogether Group will continue to use the same systems, procedures and resources to supply customers under a varied licence at the North Cooranbong scheme.

Compliance history. Altogether Group's Retail Supply Management Plan was last audited in 2021. The audit report provided to IPART identified only minor non-compliances which have been rectified.

Management plans and supporting policies. Altogether Group uses the following documents to manage its licensed retail activities:

- **Retail Supply Management Plan**¹⁷ describes the retailing activities to supply drinking water, recycled water and provide sewerage services to retail customers.
- **Complaints and Dispute Resolution Policy**¹⁸ describes the processes Altogether Group uses to respond to complaints by customers (including owners, tenants and customers) for the services provided. Altogether Group's processes for managing customer complaints and disputes has been developed to be consistent with the Australian Standard AS ISO 10002-2014 and addresses complaints handling, including complaint definition, contact details to make a complaint, tracking of complaints, assessment of complaints, response to complaints, escalation of complaints to the Energy and Water Ombudsman NSW, compliance and continuous improvement.

- **Missed Payments Policy**¹⁹ outlines how Altogether Group responds when customers (e.g. tenants or businesses) have missed one or more payments and outlines Altogether Group's approach to customers who are having difficulty paying or are concerned about not being able to pay on time. In situations of financial hardship, (i.e. where a customer does not pay its water bill), Altogether Group would continue to provide recycled and drinking water at a reasonable flow for basic health and hygiene purposes. Altogether Group, as the retail supplier, would give reasonable notice to its customers if it intended to restrict supply.
- **Incident Management Plan**²⁰ addresses continuity of service during interruptions due to incidents or operational problems, including interruptions to recycled and drinking water supplies and disruptions to the customer centre.

We consider that the plans and its implementation demonstrate Altogether Group's technical capacity to manage the retail activities that the varied licence will allow.

5.3 Organisational capacity (licensing criterion (a))

We are satisfied that Altogether Cooranbong and Altogether Group have the organisational capacity to undertake the proposed activities under the varied network operator licence and retail supplier licence.

We based our conclusion on the following information:

- **Organisational structure** of²¹ Altogether Group showing that it owns and manages its subsidiaries, including Altogether Cooranbong. Altogether Group and Altogether Cooranbong managed third parties to deliver the proposed works based on contractual arrangements and agreements.
- **Organisational chart** demonstrating that Altogether Group and Altogether Cooranbong have key personnel for areas such as business development, project delivery, operations, retail, finance technology, legal, risk and compliance are shared across the subsidiaries as required.
- **An outline of the experience of key personnel.** Altogether Group and Altogether Cooranbong have Directors, Chief Executive Officer, Executive Manager Project Delivery, Executive Manager Scheme Operations and Executive Manager Risk and Compliance, with the commensurate experience that match the role descriptions.
- **Role descriptions** outlining the required qualifications and experience required for key personnel in the North Cooranbong scheme.

5.4 Financial capacity (licensing criterion (a))

We are satisfied that Altogether Cooranbong and Altogether Group have financial capacity to undertake the proposed activities under the varied network operator licence and retail supplier licence.

We based our conclusion on the following:

- Altogether Group's owners include large superannuation and sovereign wealth funds that support the financial capacity of the Altogether Group business and impose regular periodic financial reporting on Altogether Group

- an agreement facilitating the funding of the day-to-day operations of Altogether Cooranbong and Altogether Group
- Altogether Group's financial information.

Further confidential information relating to financial capacity of the licensees is included in the briefing to the Minister accompanying this report.

We note that our financial assessment represents financial capacity at a point in time. Our recommendation to grant Altogether Cooranbong and Altogether Group varied licences should not be viewed as an endorsement of the future, ongoing viability of Altogether Cooranbong or Altogether Group. The assessment is based on a combination of information sources, none of which is to be regarded as individually determinative. We undertake this assessment for our own purposes and for the Minister's purposes in making a determination on the application. Our conclusion is not to be relied upon for any other purpose or by any other person.

5.5 Capacity to carry out those activities in a manner that does not present a risk to public health (licensing criterion (b))

We are satisfied that Altogether Cooranbong and Altogether Group have the capacity to undertake the proposed new activities in a manner that does not present a risk to public health.

The activities at the scheme will remain the same, with the exception being the additional end uses for recycled water (general washdown, street cleaning and use of process water at the recycled water treatment plant).

Therefore, we focused our assessment on Altogether Cooranbong's capacity to manage key risks to public health relating to recycled water and reviewed:

- **Risk management method.** We consider that Altogether Cooranbong and Altogether Group have demonstrated capacity to identify and manage key hazards and risks related to recycled water components of an amended scheme, to acceptable levels of risk, and would have in place reasonable control and mitigation measures.
- **Source water quality.** Altogether Cooranbong will continue to source recycled water from domestic sewage as per the existing scheme.
- **Fit for purpose recycled water quality.** Altogether Cooranbong operates water industry infrastructure at the North Cooranbong scheme under its existing licence. Altogether Cooranbong and Altogether Group have demonstrated its capacity to treat sewage and provide fit for purpose recycled water, consistent with the requirements of the AGWR, at its licensed schemes. The recycled water produced at the scheme is appropriate for the additional end uses.
- **Cross connection mitigation measures.** Altogether Cooranbong has identified appropriate controls to ensure the risks of cross connections are minimised. In addition, Altogether Cooranbong will continue to conduct quality assurance inspections of recycled water connections prior to commercial operation of new infrastructure and would follow a specific notification protocol in the case of possible cross connection incidents.

- **Recycled water supply interruption.** Any temporary interruption to the provision of recycled water at the treatment plant should pose a limited risk to public health as Altogether Cooranbong has access to reasonable volumes of drinking water from Hunter Water as top-up. In situations of financial hardship, (i.e. where a customer does not pay its water bill), Altogether Cooranbong would continue to provide recycled water at a reasonable flow for basic health and hygiene purposes. Altogether Group, as the retail supplier, would give reasonable notice to its customers if it intended to restrict supply.

NSW Health in its submission, advised that the management plans for drinking water, sewage and recycled water will need updating if details of the scheme change, including an assessment of the capacity of the systems to service the expanded area. It has requested that the risk assessment is reviewed to ensure that the additional end uses are captured.

An anonymous public submission has stated that the quality of the recycled water needs to be carefully monitored to mitigate human and environmental risk.

The current licence already has conditions in place regarding water quality monitoring.

We consider that the risk mitigation measures that Altogether Cooranbong has proposed in its risk register, are adequate to demonstrate Altogether Cooranbong's capacity to undertake the current and proposed end uses. However, this is not an endorsement of Altogether Cooranbong's current risk register by IPART, which should be further developed with NSW Health prior to supplying recycled water for the new end uses.

We consider the standard licence conditions are adequate for managing risk to public health and additional licence conditions are not required.

5.6 Appropriate arrangements with respect to insurance (licensing criterion (c))

We are satisfied that Altogether Cooranbong and Altogether Group have made, and will continue to maintain, appropriate insurance arrangements for the scheme.

We reviewed the following evidence:

- **Independent Insurance expert report²²** contained an assessment of the following insurances and certificates of currency held by Altogether Group and subsidiaries (including Altogether Cooranbong), including certificates of currency for Industrial special risk insurance policy, Workers compensation, Contractors pollution liability, Combined public and products liability and professional indemnity, Contract works, Cyber risk, General business, Management liability and Portable equipment property
- **certificates of currency** for the above insurance policies.

We requested advice from NSW government-owned insurance provider, Insurance and Care NSW (icare), on the adequacy of Altogether Cooranbong's insurance arrangements. As part of its review, icare examined:

- Altogether Cooranbong's and Altogether Group's proposal under the varied licences
- the scheme risk assessment

- insurance expert's report including insurance coverage details, certificates of currency and the insurance policies listed above.

icare concluded²³ that Altogether Cooranbong's insurance arrangements are sufficient for the existing and proposed activities.

We have also previously assessed Altogether Group's insurance as adequate for the retail supply activities, which covers a number of schemes including the Cooranbong scheme.²⁴ The insurance arrangements have not materially changed from Altogether Group's existing insurance arrangements. We consider that Altogether Group's insurance arrangements on the activities undertaken under the retail supplier licence are sufficient to cover the additional recycled water customers and new end uses in the Cooranbong scheme.

From our assessment and icare advice, we consider that both Altogether Cooranbong and Altogether Group have appropriate insurance arrangements.

5.7 Sufficient quantities of water (licensing criterion (d))

We are satisfied that if the licence variation is granted, sufficient quantities of water supplied by Altogether Group will have been obtained otherwise than from a public water utility.

We consider that by supplying an alternate source of water that reduces the drinking water demand from Hunter Water, Altogether Group satisfies this licence criterion.

5.8 Protection of the environment (licensing criterion (e))

We are satisfied that if the licence variations are granted, the activities proposed in the network operator licence will not present a significant risk to the environment.²⁵

Expanding the area of operations

The additional proposed areas have development approval under Part 4 of the EP&A Act. The water balance report²⁶ for this scheme was provided in the previous variation application. It considers the recycled water demand, drinking water demand and sewage production for the proposed expanded scheme. It includes consideration of weather patterns, project staging, sensitivity analysis, peak week demand analysis and modelling assumptions.

The water balance report shows that the scheme will have excess recycled water (particularly in winter) when approaching full build out (approximately 52 ML/year) in year 2035. The excess recycled water is a risk to the environment if Altogether Cooranbong does not find appropriate means to dispose/use the excess.

Altogether Cooranbong has a trade waste agreement^g with Hunter Water which allows for a discharge of 91kL/day (approximately 33ML/year), which significantly reduces the excess volume. The additional end uses will also assist in reducing the remaining excess.

Altogether Cooranbong have advised us that they are considering long-term alternatives including:

- irrigation only customers (e.g. Avondale College and Avondale School)^h
- 2-way (harvesting/discharge) agreement with Hunter Water to allow 145KL/day (52 ML/year) of recycled water to be discharged
- community engagement and awareness campaigns aimed to increase use of recycled water within households.²⁷

The above long-term measures are not needed for this variation as the measures in place (trade waste agreement) is sufficient for this stage of the scheme's development.

We consider Altogether Cooranbong is managing the risk of excess recycled water appropriately and that the expansion of the scheme does not pose an unreasonable risk to the environment.

End uses

The EPA has expressed concern that the proposed additional end use of recycled water for general washdown for residential and industrial use on hard surfaces and street cleaning may pose an unacceptable risk to the environment. It is unsupportive of the proposed end uses, and stated that

Recycled water is potentially high in nutrients and other pollutants. Washdown and street cleaning would result in the ingress of recycled water into gutters, the stormwater system and a release to environmental waters.²⁸

We consider that this risk should be viewed in relation to the North Cooranbong scheme rather than generally. The primary risk is the impact to waterways from recycled water containing excess phosphorus, nitrogen, salinity and chlorine.

The North Cooranbong scheme uses a membrane bioreactor system to produce high quality recycled water fit for residential use. Nitrogen is removed through the bioreactor while phosphorus is removed by chemical dosing (alum). The treatment processes are validated and are monitored using operational and verification methods to ensure water quality. The chlorine levels present in the recycled water are similar to drinking water, which is used for the same end uses.

Several Altogether Group schemes have the proposed end uses approved in their licences and have risk management measures in place including information brochures/education kits for their customers. There have been no related incidents reported, or issues raised in the annual operational audits.

^g Executed on 1 September 2022.

^h The environmental impacts of this were considered in the previous network operator licence variation in 2020.

We consider Altogether Cooranbong is managing this risk appropriately and the additional end uses do not pose an unreasonable risk to the environment.

A public submission raised similar concerns, which are addressed above. That public submission also raised concerns on the proposed irrigation areas, stating that these included environmental corridors, water ways and natural bushland.

Irrigation is already approved as an end use in the network operator licence. The scheme has 2 types of irrigation areas:

- residential
- designated irrigation zones (large areas of land for excess recycled water disposal).

The designated irrigation zones were considered in the previous application to vary Altogether Cooranbong's network operator licence, which was approved in 2020.

That activity was subject to an assessment under Part 5 of the EP&A Act. An environmental assessment (Review of Environmental Factors)²⁹ was undertaken to assess the environmental impacts of the construction, operation and maintenance of the proposed sewage and recycled water reticulation networks and irrigation activities in the designated irrigation zones. The Environmental Assessment was reviewed by our consultant, who concluded that the proposed activities, in conjunction with the proposed mitigation measures, are not likely to significantly affect the environment.³⁰

There are no designated irrigation areas in this application, only residential irrigation. This will be on land cleared and developed for residential dwelling. The proposed development has been subject to an assessment under Part 4 of the EP&A Act. Altogether Cooranbong's activities were considered in the development application process.

Additionally, Altogether Cooranbong has a suite of control measures in place to manage risk to the environment from recycled water. We consider there is minimal risk to the environment from the proposed end uses.

Odour

The public submission also claimed that Altogether Cooranbong's sewerage system is in breach of odour compliance. Altogether Cooranbong is required to have odour control as part of the Development Approval conditions of consent.

Issues relating to odour compliance should be raised with the appropriate regulatory authority, which is Lake Macquarie City Council. The council was invited to but has not made a submission on the licence variation application. EPA has not raised any issues relating to odour in its submission.

To meet the consent conditions, the treatment plant has an odour control unit, which includes a biofilter, activated carbon filter and extraction fans. Continuous monitoring is also required and is undertaken via an online hydrogen sulphide analyser. Results are kept for four years from date of recording and provided to council or EPA within 7 days of request.

Altogether Cooranbong commissioned a consultant to conduct odour and hydrogen sulphide monitoring on 13 April 2022 to assess compliance with relevant development consent conditions. The report concluded that the scheme was compliant with the odour control consent conditions.³¹

Altogether Cooranbong advised us that they received a complaint related to odour in January 2022. Altogether Cooranbong investigated the matter and identified a "slight smell" near the odour scrubber and relief valve. The valve was isolated and odour scrubber removed for further investigation/replacement and disinfection carried out.

Altogether Cooranbong were unable to conclude that this was the source of the smell as another potential source was also identified, which is not part of Altogether Cooranbong's infrastructure.

5.9 Public interest considerations (licensing criterion (f))

In addition to being satisfied of the matters discussed in sections 5.2 to 5.8 above, the Minister must also be satisfied of such other matters the Minister considers relevant, having regard to public interest. We consider the impacts of climate change under this criterion.

We are satisfied that if the licence variations are granted, resilience to climate change impacts will be supported.

One impact from climate change is the increasing pressure on NSW's water resources. Water recycling and reuse builds resilience to climate change.³² The North Cooranbong scheme produces high quality recycled water that is authorised for several uses including irrigation. This reduces the demand on drinking water for those purposes and makes the scheme's residents only partially dependent on rainfall derived water. The additional end uses will promote further use of recycled water while the expansion of the scheme will enable more residents to access recycled water.

Further expansion of the scheme is beneficial to the Hunter region, which is expected to have 5 additional hot days (days with temperatures greater than 35 degrees Celsius) per year by 2030, and maximum temperatures are projected to rise by 0.7 degrees by 2030.³³ Hotter days increases demand for water, which can be provided by the recycled water produced at the scheme. An additional benefit is that recycled water, which to date has not been subject to water restrictions, can help maintain green space during dry seasons and subsequently have a net cooling effect for the area.

We consider that the North Cooranbong scheme has a small but important role in building climate change resilience and the grant of a varied licence is beneficial to the Hunter region.

5.10 Administrative changes

We have made administrative changes to the retail supplier licence to align with the changes to the network operator licences held by the Altogether Group subsidiaries. These changes have no impact on licence conditions or obligations.

Appendices



A Draft Network Operator Licence



NEW SOUTH WALES GOVERNMENT

Water Industry Competition Act 2006 (NSW)

Network operator's licence

Licence no. 15_033

Altogether Cooranbong Pty Ltd

(ACN 169 450 453)

PRELIMINARY

1. Summary

- 1.1. This Licence is granted under section 10(1) of the Act.
- 1.2. The Act prohibits a person from constructing, maintaining or operating any water industry infrastructure otherwise than under the authority of a licence. This Licence authorises the Licensee and other Authorised Persons to carry out such activities that would otherwise be prohibited under the Act.

2. Outline

- 2.1. This Licence is divided into the following sections and schedules:

Section 1 authorises the construction, maintenance and operation of water infrastructure for non-potable water (if applicable).

Section 2 authorises the construction, maintenance and operation of water infrastructure for drinking water (if applicable).

Section 3 authorises the construction, maintenance and operation of sewerage infrastructure (if applicable).

Schedule A sets out special Ministerially-imposed licence conditions that are specific to this Licence.

Schedule B sets out Ministerially-imposed licence conditions that generally apply to network operators' licences granted under the Act.

Schedule C sets out definitions and interpretation provisions.

Schedule D sets out the area of operations for non-potable water and sewage treatment infrastructure.

Schedule E sets out the area of operations for non-potable water reticulation infrastructure.

<p>Schedule F sets out the area of operations for drinking water reticulation infrastructure and sewerage services infrastructure.</p>
<p>Schedule G provides indicative maps for reference only.</p>

- 2.2. In addition to the conditions in Schedules A and B to this Licence, the Act and Regulation also contain conditions that apply to this Licence. Nothing in Schedules A or B modify or affect the conditions imposed on this Licence by the Act or Regulation.
- 2.3. Where there is an inconsistency between Schedule G on the one hand and any of Schedules D, E and F on the other hand, Schedules D, E and F are to prevail over Schedule G to the extent of the inconsistency.

SECTION 1 – ACTIVITIES AUTHORISED: NON-POTABLE WATER

Subject to the conditions imposed by the Act, the Regulation and Schedules A and B of this Licence, this Licence authorises the Licensee and any Authorised Persons specified in Table 1.1 to construct, maintain and operate the water industry infrastructure specified in Table 1.2:

- a) for one or more of the purposes for water industry infrastructure specified in Table 1.2; and
- b) within the area of operations specified in Table 1.3.

The non-potable water supplied by means of the water industry infrastructure specified in Table 1.2 may only be used for the authorised purposes for non-potable water specified in Table 1.4.

Table 1.1 Authorised Persons

Altogether Group Pty Ltd (ACN 136 272 298)
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Table 1.2 Water industry infrastructure and purposes for water industry infrastructure

- | |
|---|
| <ul style="list-style-type: none">1) A treatment plant for non-potable water and other water infrastructure used, or to be used, in connection with the treatment plant, where components of the treatment plant or other water infrastructure may be used for one or more of the following purposes for water industry infrastructure:<ul style="list-style-type: none">a) production of non-potable water;b) treatment of non-potable water;c) filtration of non-potable water;d) storage of non-potable water; ande) conveyance of non-potable water in the area specified in Table 1.3 (1).2) A reticulation network for non-potable water and other water infrastructure used, or to be used, in connection with the reticulation network, where components of the reticulation network or other water infrastructure may be used for one or more of the following purposes for water industry infrastructure:<ul style="list-style-type: none">a) production of non-potable water;b) treatment of non-potable water;c) filtration of non-potable water;d) storage of non-potable water; ande) conveyance of non-potable water in the areas specified in Table 1.3 (2). |
|---|

Table 1.3 Area of operations

- | |
|---|
| <ol style="list-style-type: none">1) The land bounded within the sequentially numbered vertices listed in Schedule D, Table D.1 and illustrated in Map 1 in Schedule G.2) The land bounded within the sequentially numbered vertices listed in Schedule E, Table E.1 and illustrated in Map 2 in Schedule G. |
|---|

Table 1.4 Authorised purposes for non-potable water

- | |
|---|
| <ol style="list-style-type: none">1) Car washing2) Dust suppression for construction activities3) General wash down (for residential and industrial use on hard surfaces)4) Irrigation5) Ornamental water features6) Process water at recycled water treatment plant (process water would not be provided to or retailed to any end user customers)7) Street cleaning8) Toilet flushing9) Washing machines (cold water) |
|---|

SECTION 2 – ACTIVITIES AUTHORISED: DRINKING WATER

Subject to the conditions imposed by the Act, the Regulation and Schedules A and B of this Licence, this Licence authorises the Licensee and any Authorised Persons specified in Table 2.1 to construct, maintain and operate the water industry infrastructure specified in Table 2.2:

- a) for one or more of the purposes for water industry infrastructure specified in Table 2.2; and
- b) within the area of operations specified in Table 2.3.

Table 2.1 Authorised Persons

Altogether Group Pty Ltd (ACN 136 272 298)
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Table 2.2 Water industry infrastructure and purposes for water industry infrastructure

A reticulation network for drinking water and other water infrastructure used, or to be used, in connection with the reticulation network, where components of the reticulation network or other water infrastructure may also be used for one or more of the following:
--

- | |
|--|
| <ul style="list-style-type: none">a) storage of drinking water;b) conveyance of drinking water; andc) treatment of drinking water. |
|--|

Table 2.3 Area of operations

- | |
|--|
| <ul style="list-style-type: none">1) The land situated within the sequentially numbered vertices listed in Schedule F, Table F.1 and illustrated in Map 3 in Schedule G. |
|--|

SECTION 3 – ACTIVITIES AUTHORISED: SEWERAGE SERVICES

Subject to the conditions imposed by the Act, the Regulation and Schedules A and B of this Licence, this Licence authorises the Licensee and any Authorised Persons specified in Table 3.1 to construct, maintain and operate the water industry infrastructure specified in Table 3.2:

- a) for one or more of the purposes for water industry infrastructure specified in Table 3.2; and
- b) within the area of operations specified in Table 3.3.

Table 3.1 Authorised Persons

Altogether Group Pty Ltd (ACN 136 272 298)
--

Table 3.2 Water industry infrastructure and purposes for water industry infrastructure

- | |
|---|
| <ul style="list-style-type: none">1) A treatment plant for sewage and other sewerage infrastructure used, or to be used, in connection with the treatment plant, where components of the treatment plant or other sewerage infrastructure may be used for one or more of the following purposes for water industry infrastructure:<ul style="list-style-type: none">a) production of treated non-potable water from sewage;b) treatment of sewage;c) filtration of sewage;d) storage of sewage; ande) conveyance of sewagein the area specified in Table 3.3 (1)2) A reticulation network for sewage and other sewerage infrastructure used, or to be used, in connection with the reticulation network, where components of the reticulation network or other sewerage infrastructure may be used for one or more of the following purposes for water industry infrastructure:<ul style="list-style-type: none">a) production of treated non-potable water from sewage,b) treatment of sewage;c) filtration of sewaged) storage of sewage; ande) conveyance of sewagein the area specified in Table 3.3 (2) |
|---|

Table 3.3 Area of operations

- | | |
|----|---|
| 1) | The land situated within the sequentially numbered vertices listed in Schedule D, Table D.1 and illustrated in Map 1 in Schedule G. |
| 2) | The land situated within the sequentially numbered vertices listed in Schedule D, Table F.2 and illustrated in Map 3 in Schedule G. |

SCHEDULE A – SPECIAL MINISTERIALLY-IMPOSED LICENCE CONDITIONS

1. Notification of changes to Agreements

1.1. If a party to an Agreement proposes to:

- a) terminate the Agreement;
- b) novate the Agreement;
- c) assign or transfer any of its rights or obligations under the Agreement to any other person; or
- d) alter the Agreement in any way that materially reduces the Licensee's technical, financial or organisational capacity to carry out the activities authorised by this Licence,

the Licensee must provide IPART with written notice of that fact as soon as practicable, but no later than 3 months, before the time when the proposed action is to occur. The written notice must include details of how the services provided under the Agreement will be provided subsequent to the proposed termination, novation, assignment, transfer or alteration.

2. Review of Environmental Factors

2.1. Where the Licensee carries out any activities authorised by this Licence, the Licensee must:

- a) implement environmental risk mitigation measures substantially consistent with the environmental risk mitigation measures identified in the REF; and
- b) specify, in any Plan or combination of Plans, how the Licensee will implement environmental risk mitigation measures substantially consistent with the environmental risk mitigation measures identified in the REF.

3. Construction Environmental Management Plan

3.1. The Licensee must not commence, or authorise the commencement of, the construction of any Water Industry Infrastructure the subject of the REF until after the Licensee has provided a Construction Environmental Management Plan to IPART, and IPART has provided written approval of the Construction Environmental Management Plan to the Licensee.

3.2. The Licensee must ensure that the construction of any Water Industry Infrastructure the subject of the REF is carried out in accordance with the approved Construction Environmental Management Plan.

4. Management of Designated Irrigation Zones

- 4.1. The Licensee must manage irrigation of Designated Irrigation Zones in accordance with the recommendations in the LCA
- 4.2. The Licensee must monitor soil condition of Designated Irrigation Zones on an annual basis and maintain records of monitoring. Any deterioration to soil conditions from the LCA must be reported to IPART with proposed mitigation measures that the Licensee will undertake. The licensee must undertake, and maintain records of, all proposed mitigation measures unless notified otherwise by IPART

5. Water Quality Plan

- 5.1. The licensee must ensure that its Water Quality Plan is a single, cohesive and structured scheme specific document which specifies the actions the licensee must take to implement the 12 elements of the framework for recycled water and drinking water quality management and use set out in the Australian Guidelines for Water Recycling and the Australian Drinking Water Guidelines.

6. Operational Procedures

- 6.1. The Licensee must develop and document, consistent with element 4 of the Australian Guidelines for Water Recycling and Australian Drinking Water Guidelines:
 - a) monitoring protocols for operational performance of the recycled water and drinking water supply systems, including the selection of operational parameters and criteria, and the routine analysis of results;
 - b) procedures for corrective action where operational parameters are not met;
 - c) procedures for rapid communication systems to deal with unexpected events; and
 - d) programs for regular inspection and maintenance of all equipment, including monitoring equipment.
- 6.2. The Licensee must:
 - a) fully implement the Operational Procedures;
 - b) ensure that all of its activities are carried out in accordance with the Operational Procedures; and
 - c) keep records to demonstrate the extent to which the Operational Procedures have been implemented and complied with.

SCHEDULE B – GENERAL MINISTERIALLY-IMPOSED LICENCE CONDITIONS

1. Ongoing capacity to operate

- 1.1. The Licensee must have the technical, financial and organisational capacity to carry out the activities authorised by this Licence. If the Licensee ceases to have this capacity, it must report this to IPART in accordance with the Reporting Manual.

2. Maintaining appropriate insurance

- 2.1. The Licensee must hold insurance that is appropriate for the size and nature of the activities that the Licensee is carrying out under this Licence.
- 2.2. The Licensee must provide a copy of each certificate of currency of the insurance maintained by the Licensee to IPART in accordance with the Reporting Manual.
- 2.3. Before commencing to commercially operate the Specified Water Industry Infrastructure under this Licence, the Licensee must demonstrate that the insurance held is appropriate for the size and nature of those commercial operation activities, by providing a report to IPART from an Insurance Expert that:
- a) certifies that in the Insurance Expert's opinion, the type, scope and limit of the insurance held by the Licensee is appropriate for the size and nature of those commercial operation activities; and
 - b) is in the form prescribed by the Reporting Manual.
- 2.4. [Not applicable]
- 2.5. If, in relation to the activities authorised by this Licence, there is, or is to be, a change in either of the following, the Licensee must provide a report to IPART in accordance with the Reporting Manual:
- a) the insurer or underwriting panel in respect of an insurance policy held by the Licensee; or
 - b) the type, scope or limit on the amount of insurance held by the Licensee.
- 2.6. From time to time when requested in writing by IPART, the Licensee must provide a report to IPART, in the manner and form and within the timeframes specified by IPART, from an Insurance Expert certifying that in the Insurance Expert's opinion the type, scope and limit on the amount of insurance held by the Licensee is appropriate for the size and nature of the activities that the Licensee is carrying out under this Licence.

[Note: The circumstances in which IPART may request a report under clause 2.6 include (but are not limited to) the following:

- *where IPART considers that there may be a change in the type, scope or limit on the amount of insurance held by the Licensee in relation to activities that the Licensee is carrying out under this Licence;*
- *where there is a change in the type or extent of activities authorised by this Licence;
or*
- *where IPART or an approved auditor considers that the type, scope or limit on the amount of insurance held by the Licensee may not be appropriate for the size and nature of the activities that the Licensee is carrying out under this Licence.]*

2.7. The Licensee must maintain professional indemnity insurance during the Design Phase and for a minimum period of 6 years from the date of the completion of the Design Phase.

3. Complying with NSW Health requirements

3.1. The Licensee must carry out the activities authorised by this Licence in compliance with any requirements of NSW Health that:

- a) IPART has agreed to; and
- b) are notified from time to time to the Licensee by IPART in writing.

4. Complying with Audit Guidelines

4.1. The Licensee must comply with any Audit Guidelines issued by IPART.

5. Reporting in accordance with the Reporting Manual

5.1. The Licensee must prepare and submit reports in accordance with the Reporting Manual.

6. Reporting information in relation to the register of licences

6.1. The Licensee must notify IPART, and provide IPART with details, of any change in relation to the following, in accordance with the Reporting Manual, within 14 days of the change:

- a) any source from which the water handled by the Specified Water Industry Infrastructure is derived;

- b) the identity of each licensed retail supplier or public water utility that has access to the infrastructure services provided by the Specified Water Industry Infrastructure for the purpose of supplying water to its customers;
- c) any other water infrastructure to which the Specified Water Industry Infrastructure is connected;
- d) in the case of non-potable water, the authorised purposes for that water;
- e) the identity of each licensed retail supplier or public water utility that has access to infrastructure services provided by the Specified Water Industry Infrastructure for the purpose of providing sewerage services to its customers;
- f) any other sewerage infrastructure to which the Specified Water Industry Infrastructure is connected; and
- g) the arrangements for the disposal of waste from the water industry infrastructure specified in section 3, Table 3.2.

7. Monitoring

- 7.1. The Licensee must undertake any monitoring that is required for the purposes of this Licence, any Plan, the Act or the Regulation in accordance with this clause 7.
- 7.2. The Licensee must keep the following records of any samples taken for monitoring purposes specified in the Water Quality Plan:
 - a) the date on which the sample was taken;
 - b) the time at which the sample was collected;
 - c) the point or location at which the sample was taken; and
 - d) the chain of custody of the sample (if applicable).
- 7.3. The Licensee must ensure that analyses of all samples taken for the purposes of Verification Monitoring are carried out by a laboratory accredited for the specified tests by an independent body that is acceptable to NSW Health, such as the National Association of Testing Authorities or an equivalent body.

8. Delineating responsibilities

- 8.1. If a code of conduct has not been established under section 46 of the Regulation, the Licensee must, by a date specified by IPART, establish a code of conduct (**Licensee's Code of Conduct**) in accordance with this clause 8.
- 8.2. Before the Licensee brings the Specified Water Industry Infrastructure into commercial operation or by a later date specified by IPART (if any), the Licensee's Code of Conduct must be agreed in writing between:
 - a) the Licensee; and

- b) each licensed network operator, licensed retail supplier and/or public water utility that:
 - i) supplies water or provides sewerage services by means of any water industry infrastructure that is connected to the Specified Water Industry Infrastructure; or
 - ii) constructs, maintains or operates any water industry infrastructure that is connected to the Specified Water Industry Infrastructure.

8.3. [Not applicable]

8.4. The Licensee's Code of Conduct must set out the respective responsibilities of the entities specified in clause 8.2 by, at a minimum, providing for:

- a) who is responsible for repairing, replacing or maintaining any pipes, pumps, valves, storages or other infrastructure connecting the Specified Water Industry Infrastructure to the other water industry infrastructure;
- b) who is responsible for water quality;
- c) who is liable in the event of the unavailability of water;
- d) who is liable in the event of failure of any water industry infrastructure;
- e) the fees and charges payable in respect of the use of the water industry infrastructure; and
- f) who is responsible for handling customer complaints.

8.5. The Licensee must not contravene the Licensee's Code of Conduct to the extent that it makes the Licensee responsible or liable for the matters set out in it.

9. Notification of changes to end-use

9.1. If the Licensee proposes to operate the Specified Water Industry Infrastructure to supply non-potable water for an end-use which is not set out in the most recent Water Quality Plan provided to IPART, the Licensee must notify IPART in writing at least 3 months before commencing such operation.

10. Notification of commercial operation

10.1. Each time the Licensee has brought any new Specified Water Industry Infrastructure into commercial operation, the Licensee must:

- a) notify IPART in accordance with the Reporting Manual that it has brought the relevant Specified Water Industry Infrastructure into commercial operation; and
- b) provide such notification within 10 days after it has brought the relevant Specified Water Industry Infrastructure into commercial operation.

11. Notification of non-compliant Plumbing

11.1. If the Licensee becomes aware that a customer's Plumbing is not Code Compliant, the Licensee must, within 10 days:

- a) notify the customer of that fact, in writing, and
- b) where the Plumbing that is not Code Compliant threatens, or could threaten, water quality, public health or safety, also notify the Plumbing Regulator of that fact, in writing.

[Note: Without limiting paragraph (b), an example of Plumbing which must be notified to the Plumbing Regulator under that clause is Plumbing that contains a point where it is possible for non-potable water to come into contact with a drinking water supply.]

SCHEDULE C – INTERPRETATION AND DEFINITIONS

1. Interpretation

1.1. In this Licence, unless the context requires otherwise:

- a) the singular includes the plural and vice versa;
- b) headings are used for convenience only and do not affect the interpretation of this Licence;
- c) a reference to a document includes the document as modified from time to time and any document replacing it;
- d) a reference to a “person” includes a natural person and any body or entity whether incorporated or not;
- e) a reference to a clause is to a clause in this Licence;
- f) a reference to a section is to a section in this Licence;
- g) a reference to a schedule is to a schedule to this Licence;
- h) a reference to a law or statute includes regulations, rules, codes and other instruments under it, and consolidations, amendments, re-enactments or replacements of them; and
- i) explanatory notes do not form part of this Licence, but in the case of uncertainty may be relied on for interpretation purposes.

2. Definitions

2.1. Expressions used in this Licence that are defined in the Act or the Regulation have the meanings set out in the Act or the Regulation.

2.2. In this Licence:

Act means the *Water Industry Competition Act 2006* (NSW).

Agreement means any agreement or deed provided to IPART in connection with the Licensee's application for this Licence, or any application to vary this Licence.

Audit Guidelines means the document titled “*Audit Guideline under the Water Industry Competition Act 2006 (NSW)*”, which is prepared by IPART and is available on IPART's [website](#), and any other guidelines issued by IPART in relation to audits under the Act.

Authorised Person	means each person specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.1; b) section 2, Table 2.1; and c) section 3, Table 3.1.
Authorised Purposes	means the authorised purposes specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.4; b)
Code Compliant	has the meaning given to that term under section 7 of the <i>Plumbing and Drainage Act 2011</i> (NSW).
Construction Environmental Management Plan	means a site or project specific plan which: <ul style="list-style-type: none"> a) complies with the basic structure detailed in the Environmental Management Plan Guidelines; and b) identifies how the Licensee will implement the environmental risk mitigation measures identified in the REF to the extent they relate to construction.
Designated Irrigation Zones	means designated irrigation zones identified in the LCA.
Design Phase	means the period during which any design works are carried out in relation to the water industry infrastructure that the Licensee is authorised to construct, maintain and operate under this Licence.
Environmental Management Plan Guidelines	means the document titled “ <i>Guideline for the Preparation of Environmental Management Plans</i> ”, prepared by the Department of Infrastructure, Planning and Natural Resources.

Insurance Expert	means an insurance broker which holds an Australian financial services licence under Part 7.6 of the <i>Corporations Act 2001</i> (Cth) that authorises the broker to provide financial product advice for, and deal in, contracts of insurance within the meaning of Chapter 7 of that Act.
IPART	means the Independent Pricing and Regulatory Tribunal of New South Wales established under the <i>Independent Pricing and Regulatory Tribunal Act 1992</i> (NSW).
LCA	means the “ <i>Land Capability Assessment and Recycled Water Irrigation Plan North Cooranbong, NSW (Extension to Cooranbong Water NOL#15_033)</i> ”, 24 September 2018.
Licence	means this network operator’s licence granted under section 10 of the Act.
Licensee	means Altogether Cooranbong (ACN 169 450 453).
Licensee’s Code of Conduct	has the meaning given in Schedule B, clause 8.1.
Minister	means the Minister responsible for Part 2 of the Act.
NSW Health	means the Water Unit of NSW Ministry of Health and any of the local health districts as defined by the NSW Ministry of Health.
Operational Procedures	Means the protocols, procedures and programs referred to in Schedule A, clause 6.1 (a)-(d).
Ornamental Water Feature	means water features that: <ul style="list-style-type: none"> a) are provided primarily for aesthetic or beautification purposes, and b) do not, by their design or accessibility, encourage interaction with the water.

Plan	means any infrastructure operating plan, water quality plan or sewage management plan that the Licensee is required to prepare under the Regulation.
Plumbing	means any pipe, fitting or apparatus that is situated: <ul style="list-style-type: none"> a) downstream of the customer's connection point to a water main, where the water main is Specified Water Industry Infrastructure; b) upstream of a customer's connection point to a sewer main, where the sewer main is Specified Water Industry Infrastructure; or c) upstream of a customer's connection point to a stormwater drain, where the stormwater drain is Specified Water Industry Infrastructure.
Plumbing Regulator	has the meaning given to that term under section 3 of the <i>Plumbing and Drainage Act 2011</i> (NSW).
REF	means the document titled "Extension of WICA Network Operator Licence 15_033 Cooranbong – Review of Environmental Factors", Version E, prepared by RPS Australia East Pty Ltd and dated 25 September 2019 and does not include any modified version of that document or any document replacing it.
Regulation	means the <i>Water Industry Competition (General) Regulation 2021</i> (NSW).
Reporting Manual	means the document titled "Network Operator's Reporting Manual and Retail Supplier's Reporting Manual under <i>Water Industry Competition Act 2006</i> ", which is prepared by IPART and is available on IPART's website .
Specified Water Industry Infrastructure	means the water industry infrastructure specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.2; b) section 2, Table 2.2; and c) section 3, Table 3.2.

Verification Monitoring	means verification monitoring as described in the document titled “ <i>Australian Drinking Water Guidelines</i> ” or the document titled “ <i>Australian Guidelines for Water Recycling</i> ” as the case may be.
Water Quality Plan	means the water quality plan that the Licensee is required to prepare under the Regulation.

**SCHEDULE D – AREA OF OPERATIONS – NON-POTABLE WATER AND SEWAGE
TREATMENT INFRASTRUCTURE**

Table D.1 Vertices for area of operation

Vertex	Coordinates ¹	
	Eastings	Northings
1	355974.226	6340014.313
2	356089.188	6340029.934
3	356098.205	6340031.159
4	356139.302	6340022.406
5	356132.106	6339947.433
6	356089.208	6339500.483
7	356087.789	6339499.203
8	356047.991	6339543.034
9	356029.467	6339554.282
10	356000.436	6339586.616
11	356001.255	6339815.371
12	355985.02	6339934.868
13	355974.226	6340014.313

1 Coordinate reference system is MGA 56

SCHEDULE E – AREA OF OPERATIONS – NON-POTABLE WATER RETICULATION INFRASTRUCTURE

Table E.1 Vertices for area of operation

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
1	354351.2032	6342167.55	40	356886.7544	6341561.315
2	355299.0591	6342004.698	41	356905.4434	6341559.175
3	355481.7702	6341970.798	42	356918.4644	6341554.533
4	355968.7745	6341889.258	43	356933.4451	6341543.878
5	355910.9731	6341549.353	44	356947.2888	6341529.441
6	356030.2172	6341528.629	45	356950.2595	6341524.532
7	356042.3055	6341524.597	46	356950.7404	6341518.83
8	356053.7802	6341517.656	47	356941.1524	6341492.611
9	356059.2623	6341523.277	48	356973.8372	6341489.636
10	356063.8984	6341524.421	49	356970.0052	6341447.536
11	356150.4259	6341511.494	50	356958.5035	6341430.794
12	356154.1373	6341509.362	51	356910.2449	6341435.186
13	356156.0162	6341505.516	52	356904.0881	6341367.363
14	356151.8121	6341474.016	53	356904.6084	6341357.693
15	356147.3803	6341455.807	54	356907.3558	6341348.406
16	356139.1553	6341435.551	55	356937.9678	6341282.014
17	356127.8378	6341416.846	56	356943.9535	6341272.817
18	356116.3119	6341403.44	57	356952.5981	6341265.16
19	356102.1618	6341393.101	58	356962.4513	6341260.33
20	356085.9769	6341386.396	59	357001.7439	6341253.435
21	356068.6568	6341383.682	60	356933.2081	6340826.617
22	356062.9231	6341320.682	61	356697.2687	6340864.52
23	356066.543	6341316.338	62	356716.8212	6340986.479
24	356148.1929	6341308.907	63	356698.0811	6340989.49
25	356152.5373	6341312.527	64	356547.334	6340997.065
26	356155.7868	6341347.522	65	356539.496	6340910.933
27	356159.2834	6341364.424	66	356474.5869	6340914.194
28	356201.2679	6341482.23	67	356467.2675	6340854.495
29	356208.6185	6341494.359	68	356519.329	6340851.879
30	356218.6717	6341504.363	69	356523.8871	6340730.167
31	356230.2204	6341511.374	70	356522.9701	6340704.462
32	356243.7344	6341515.677	71	356513.2786	6340649.717
33	356318.5392	6341529.795	72	356630.136	6340632.035
34	356336.2238	6341531.366	73	356665.942	6340593.686
35	356531.1768	6341529.48	74	356656.7139	6340540.412
36	356634.1903	6341520.105	75	356518.0086	6340564.596
37	356640.2503	6341533.687	76	356508.2655	6340509.56
38	356652.0593	6341542.729	77	356459.4615	6340518.274
39	356843.4348	6341559.485	78	356457.6412	6340507.902

Coordinates ¹		
Vertex	Easting	Northing
79	356313.9231	6340533.018
80	356315.1177	6340539.803
81	356254.867	6340550.467
82	356241.3216	6340473.298
83	356252.6927	6340471.218
84	356238.7413	6340391.891
85	356227.397	6340393.974
86	356218.2323	6340341.748
87	356253.743	6340335.23
88	356248.901	6340307.638
89	356308.0843	6340296.774
90	356298.1922	6340238.878
91	356377.7982	6340225.529
92	356373.4623	6340204.142
93	356272.2473	6340220.896
94	356235.053	6340162.098
95	356321.1309	6340027.544
96	356340.7716	6340033.218
97	356370.8874	6340204.311
98	356373.511	6340204.045
99	356332.716	6339966.2
100	356323.6833	6339976.503
101	356251.4245	6339906.549
102	356139.3023	6340022.406
103	356089.2085	6339500.483
104	356087.7894	6339499.203
105	356102.1794	6339485.034
106	356191.0571	6339385.867
107	355937.5185	6339157.174
108	355789.4848	6339135.747
109	355823.9933	6338896.791
110	356022.9611	6338925.561
111	355991.42	6339144.608
112	356208.6784	6339176.099
113	356179.9009	6339009.081
114	356237.3283	6338610.893
115	356323.1962	6338606.372
116	356541.8616	6338568.677
117	356461.4455	6338420.286
118	356360.0849	6338292.326
119	356379.9633	6338285.023
120	356478.3201	6338409.186
121	356491.9674	6338434.366
122	356583.6216	6338418.63

Coordinates ¹		
Vertex	Easting	Northing
123	356568.2394	6338323.669
124	356564.4036	6338288.776
125	356632.7128	6338280.794
126	356650.7996	6338281.006
127	356667.0847	6338284.079
128	356677.6149	6338288.387
129	356690.8244	6338297.576
130	356701.292	6338309.422
131	356707.4465	6338319.488
132	356715.981	6338343.113
133	356724.1198	6338391.561
134	356728.0775	6338401.796
135	356736.6454	6338414.624
136	356752.5004	6338428.577
137	356772.5931	6338440.379
138	356788.5064	6338444.86
139	356800.9784	6338443.328
140	356818.0206	6338433.446
141	356842.5379	6338406.662
142	356950.5935	6338257.692
143	357019.8976	6338176.299
144	357061.0626	6338114.588
145	357081.5601	6338092.951
146	357120.2931	6338058.492
147	357135.4552	6338041.178
148	357145.5965	6338024.293
149	357153.1838	6338004.932
150	357157.8149	6337983.363
151	357159.1841	6337960.979
152	357155.0688	6337887.123
153	357154.5592	6337807.668
154	357152.5153	6337774.825
155	357146.4843	6337740.862
156	357137.9999	6337723.525
157	357129.9002	6337718.766
158	357122.622	6337719.477
159	357089.1699	6337734.891
160	357065.1978	6337739.497
161	356997.6263	6337736.055
162	356953.025	6337730.088
163	356934.6612	6337725.073
164	356906.707	6337713.101
165	356822.1603	6337665.443
166	356803.2384	6337650.252

Coordinates ¹		
Vertex	Easting	Northing
167	356767.0571	6337596.674
168	356749.5075	6337576.753
169	356739.8423	6337568.055
170	356719.0227	6337554.535
171	356707.9815	6337550.26
172	356696.5979	6337548.003
173	356684.9263	6337548.037
174	356664.1993	6337553.916
175	356654.3638	6337559.203
176	356641.1618	6337569.346
177	356628.4416	6337584.529
178	356598.9039	6337631.531
179	356580.1991	6337650.904
180	356564.2373	6337661.828
181	356512.3972	6337689.775
182	356478.0986	6337715.951
183	356459.6423	6337733.72
184	356438.2115	6337742.905
185	356412.6986	6337755.151
186	356392.2883	6337761.274
187	356364.7344	6337764.336
188	356338.201	6337763.315
189	356306.565	6337756.172
190	356277.2223	6337750.143
191	356257.1892	6337752.252
192	356237.17	6337757.192
193	356210.6366	6337754.131
194	356163.6929	6337737.802
195	356132.0569	6337714.33
196	356096.3389	6337707.187
197	356064.7029	6337704.125
198	356028.9849	6337693.92
199	355984.0822	6337674.53
200	355937.1385	6337656.161
201	355900.4	6337649.018
202	355877.9487	6337644.935
203	355862.8777	6337638.371
204	355835.89	6337626.487
205	355817.9448	6337621.564
206	355798.1395	6337618.504
207	355777.5665	6337617.681
208	355747.6481	6337621.442
209	355731.5028	6337626.918
210	355717.6593	6337634.403

Coordinates ¹		
Vertex	Easting	Northing
211	355706.8164	6337643.33
212	355699.6769	6337653.128
213	355696.9448	6337663.226
214	355699.135	6337673.375
215	355705.6249	6337683.3
216	355715.3792	6337693.055
217	355766.4179	6337731.498
218	355777.0228	6337741.236
219	355784.7006	6337751.137
220	355788.4203	6337761.253
221	355788.2412	6337768.358
222	355785.9466	6337775.517
223	355776.0381	6337789.685
224	355751.7044	6337809.401
225	355722.1388	6337825.412
226	355664.4798	6337849.849
227	355623.4012	6337879.835
228	355577.5688	6337906.259
229	355568.5482	6337915.18
230	355563.2917	6337923.986
231	355558.3869	6337940.049
232	355551.022	6337977.643
233	355549.6908	6337996.799
234	355553.503	6338007.62
235	355575.7391	6338033.84
236	355580.5202	6338044.389
237	355581.2818	6338059.65
238	355572.9164	6338104.716
239	355571.7022	6338121.62
240	355575.1224	6338135.698
241	355589.236	6338157.565
242	355592.6712	6338168.36
243	355592.5521	6338179.843
244	355589.4958	6338191.935
245	355584.1228	6338204.549
246	355544.1488	6338272.612
247	355535.2708	6338294.305
248	355532.8019	6338312.183
249	355537.471	6338356.543
250	355537.2449	6338368.528
251	355524.1561	6338415.775
252	355525.1173	6338444.681
253	355533.3376	6338498.338
254	355533.5197	6338529.908

Coordinates ¹		
Vertex	Easting	Northing
255	355669.9016	6338549.522
256	355636.3532	6338788.534
257	355468.2379	6338764.362
258	355486.0709	6338786.892
259	355445.2503	6338782.81
260	355460.558	6338804.241
261	355476.8862	6338821.589
262	355487.0914	6338837.918
263	355493.2145	6338854.246
264	355491.1734	6338873.636
265	355477.9067	6338890.984
266	355464.64	6338906.292
267	355475.8657	6338926.702
268	355485.0503	6338962.42
269	355488.5285	6339016.019
270	355474.2678	6339058.219
271	355430.8224	6339049.207
272	355436.9468	6338912.439
273	355406.718	6338958.67
274	355406.3618	6338907.672
275	355413.2132	6338797.484
276	355384.1088	6338766.488
277	355088.7125	6338812.032
278	355074.8033	6338833.836
279	355086.2572	6338847.995
280	355158.7165	6338902.9
281	355095.7282	6338985.464
282	355100.7145	6339019.034
283	355019.5944	6339031.162
284	354999.702	6339034.136
285	354949.3993	6339055.461
286	354914.0339	6339100.776
287	354903.5099	6339161.362
288	354918.4558	6339213.79
289	354957.3615	6339261.673
290	355021.0168	6339258.656
291	355032.1683	6339252.737
292	355057.6426	6339238.45
293	355111.0587	6339207.847
294	355132.759	6339193.38
295	355154.4593	6339173.349
296	355176.1596	6339151.648
297	355198.9727	6339124.94
298	355267.9685	6339045.373

Coordinates ¹		
Vertex	Easting	Northing
299	355310.2563	6339070.968
300	355365.898	6339088.217
301	355379.8085	6339067.629
302	355421.3876	6339083.222
303	355463.6195	6339089.985
304	355461.6587	6339099.942
305	355455.4627	6339113.957
306	355441.8092	6339127.7
307	355413.7604	6339142.32
308	355392.2049	6339146.316
309	355349.1339	6339145.765
310	355338.4871	6339146.942
311	355330.7742	6339150.025
312	355314.5882	6339161.987
313	355289.1462	6339166.632
314	355269.5102	6339174.344
315	355258.6598	6339181.818
316	355245.0254	6339195.774
317	355213.3342	6339246.487
318	355199.8153	6339264.278
319	355158.6977	6339298.172
320	355147.1433	6339309.774
321	355123.2565	6339346.423
322	355117.416	6339349.312
323	355109.9448	6339349.842
324	355068.5342	6339345.162
325	355117.6766	6339652.622
326	355550.2402	6339583.617
327	355576.3593	6339431.622
328	355525.5186	6339425.709
329	355531.9145	6339389.629
330	355583.0992	6339392.407
331	355586.5296	6339372.449
332	355535.4502	6339369.686
333	355563.5946	6339208.952
334	355612.1314	6339223.46
335	355612.6778	6339220.288
336	355560.5946	6339204.72
337	355565.7333	6339187.531
338	355578.939	6339191.213
339	355583.7397	6339175.155
340	355603.3996	6339181.31
341	355618.9993	6339183.497
342	355625.7546	6339144.186

Coordinates ¹		
Vertex	Easting	Northing
343	355644.3082	6339154.984
344	355624.98	6339267.451
345	355665.813	6339279.627
346	355663.1748	6339294.965
347	355765.5285	6339309.428
348	355761.3587	6339339.956
349	355850.9637	6339420.835
350	355885.3896	6339382.592
351	355897.4398	6339393.442
352	355898.8761	6339391.848
353	355916.726	6339407.919
354	355921.3283	6339402.81
355	355951.1932	6339429.749
356	355910.712	6339474.699
357	355942.1583	6339503.048
358	355937.1502	6339540.082
359	355945.4194	6339544.483

Coordinates ¹		
Vertex	Easting	Northing
360	355948.8351	6339553.537
361	355932.9574	6339571.07
362	355874.5629	6340000.771
363	356089.1884	6340029.934
364	356094.4185	6340035.212
365	356086.4799	6340036.879
366	356060.9395	6340102.362
367	355678.5759	6340204.001
368	355661.6896	6340226.428
369	355622.1051	6340206.968
370	355619.6748	6340201.311
371	355612.8456	6340219.758
372	355419.9331	6340404.335
373	355246.2423	6340528.696
374	355314.5451	6340956.877
375	354351.2032	6342167.55

¹ Coordinate reference system is MGA 56

SCHEDULE F – AREA OF OPERATIONS – DRINKING WATER RETICULATION AND SEWERAGE SERVICES INFRASTRUCTURE

Table F.1 Vertices for area of operation

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
1	354351.202	6342167.55	40	356929.2233	6341547.347
2	355947.934	6341892.376	41	356943.7824	6341533.631
3	355893.8822	6341555.271	42	356949.5473	6341526.21
4	355917.771	6341547.83	43	356950.8679	6341520.039
5	356031.5262	6341528.329	44	356941.1511	6341492.611
6	356043.519	6341524.023	45	356973.8359	6341489.636
7	356053.7789	6341517.656	46	356970.004	6341447.536
8	356059.261	6341523.278	47	356958.5022	6341430.795
9	356063.6657	6341524.442	48	356910.2436	6341435.186
10	356153.4323	6341510.022	49	356904.0868	6341367.364
11	356156.084	6341503.831	50	356904.8169	6341356.571
12	356149.3958	6341462.815	51	356907.5832	6341347.884
13	356141.8295	6341441.202	52	356937.9665	6341282.014
14	356130.219	6341420.268	53	356945.1096	6341271.521
15	356117.9658	6341405.026	54	356953.5704	6341264.533
16	356103.4837	6341393.866	55	356963.0002	6341260.149
17	356086.71	6341386.607	56	357001.7426	6341253.436
18	356068.6555	6341383.683	57	356976.796	6341088.994
19	356062.9218	6341320.683	58	356933.899	6340819.976
20	356066.5417	6341316.339	59	356697.067	6340862.109
21	356148.1916	6341308.907	60	356717.346	6340981.24
22	356152.536	6341312.527	61	356698.489	6340984.596
23	356155.7855	6341347.523	62	356547.095	6340995.2
24	356159.0312	6341363.55	63	356539.4947	6340910.934
25	356200.9918	6341481.612	64	356538.803	6340910.934
26	356207.3885	6341492.743	65	356474.5856	6340914.195
27	356216.5725	6341502.651	66	356467.6338	6340857.036
28	356227.7845	6341510.189	67	356519.4781	6340853.412
29	356240.426	6341514.954	68	356523.8843	6340734.862
30	356318.5379	6341529.796	69	356523.2067	6340709.112
31	356335.2867	6341531.355	70	356514.0588	6340653.717
32	356531.1755	6341529.481	71	356628.492	6340635.63
33	356634.189	6341520.105	72	356663.771	6340597.367
34	356640.249	6341533.688	73	356655.421	6340548.975
35	356652.058	6341542.73	74	356518.744	6340571.539
36	356843.4335	6341559.485	75	356507.647	6340509.879
37	356878.9466	6341561.374	76	356459.461	6340518.274
38	356899.3864	6341560.188	77	356457.642	6340507.902
39	356915.0473	6341556.156	78	356314.239	6340533.244

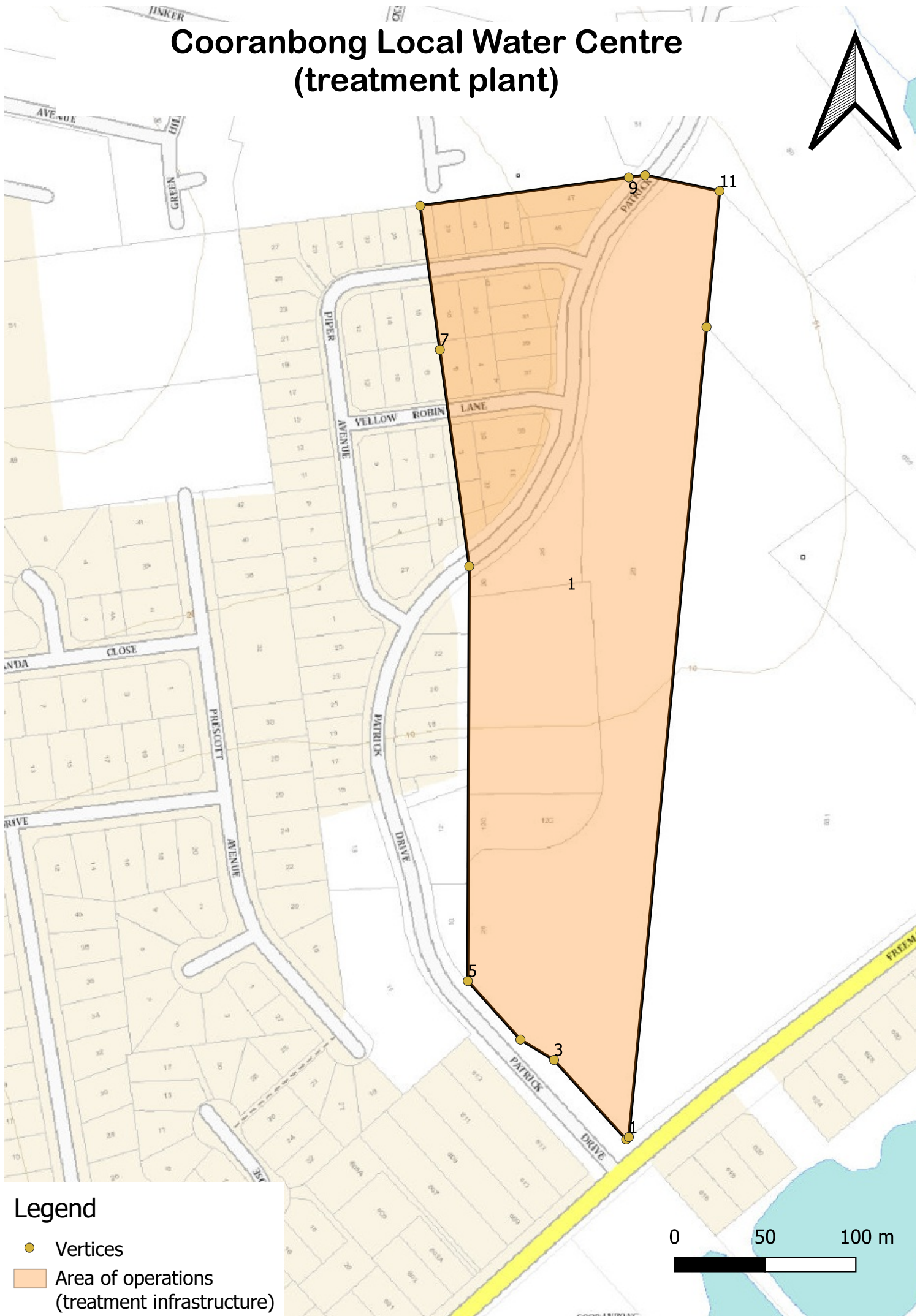
Coordinates ¹		
Vertex	Easting	Northing
79	356314.179	6340540.351
80	356255.557	6340549.401
81	356241.003	6340473.322
82	356251.795	6340469.873
83	356238.394	6340391.931
84	356228.412	6340393.983
85	356218.483	6340342.249
86	356253.676	6340334.913
87	356249.597	6340308.5
88	356308.787	6340296.974
89	356297.856	6340238.541
90	356377.774	6340225.556
91	356373.42	6340204.076
92	356271.293	6340220.551
93	356235.132	6340161.656
94	356281.62	6340098.924
95	356320.705	6340027.191
96	356341.037	6340032.67
97	356370.51	6340204.431
98	356373.42	6340204.076
99	356332.72	6339966.2
100	356323.68	6339976.503
101	356251.424	6339906.549
102	356139.306	6340022.406
103	356089.208	6339500.483
104	356087.789	6339499.202

Coordinates ¹		
Vertex	Easting	Northing
105	356102.181	6339485.034
106	356191.06	6339385.868
107	356101.721	6339305.283
108	356018.411	6339397.769
109	356004.08	6339423.674
110	356067.507	6339480.903
111	356000.322	6339555.491
112	355942.156	6339503.049
113	355937.149	6339540.083
114	355945.422	6339544.484
115	355948.837	6339553.537
116	355932.958	6339571.07
117	355874.564	6340000.771
118	356089.192	6340029.935
119	356060.937	6340102.361
120	355678.579	6340204.001
121	355678.5746	6340204.001
122	355661.6883	6340226.428
123	355622.1038	6340206.968
124	355619.6735	6340201.311
125	355612.8443	6340219.758
126	355419.9318	6340404.335
127	355246.241	6340528.697
128	355277.225	6340723.274
129	355314.438	6340956.788
130	354351.202	6342167.55

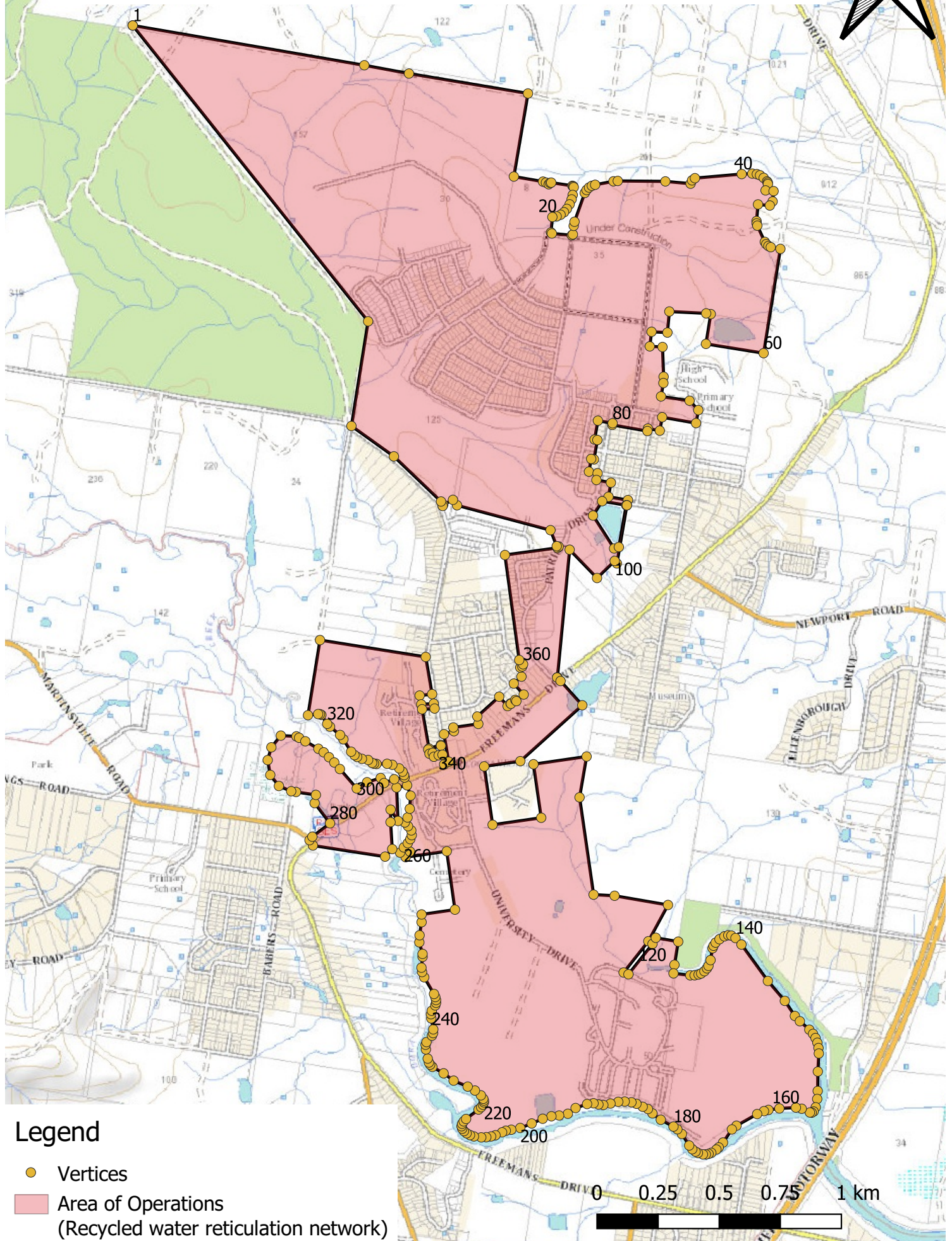
¹ Coordinate reference system is MGA 56

SCHEDULE G – AREA OF OPERATIONS – MAPS

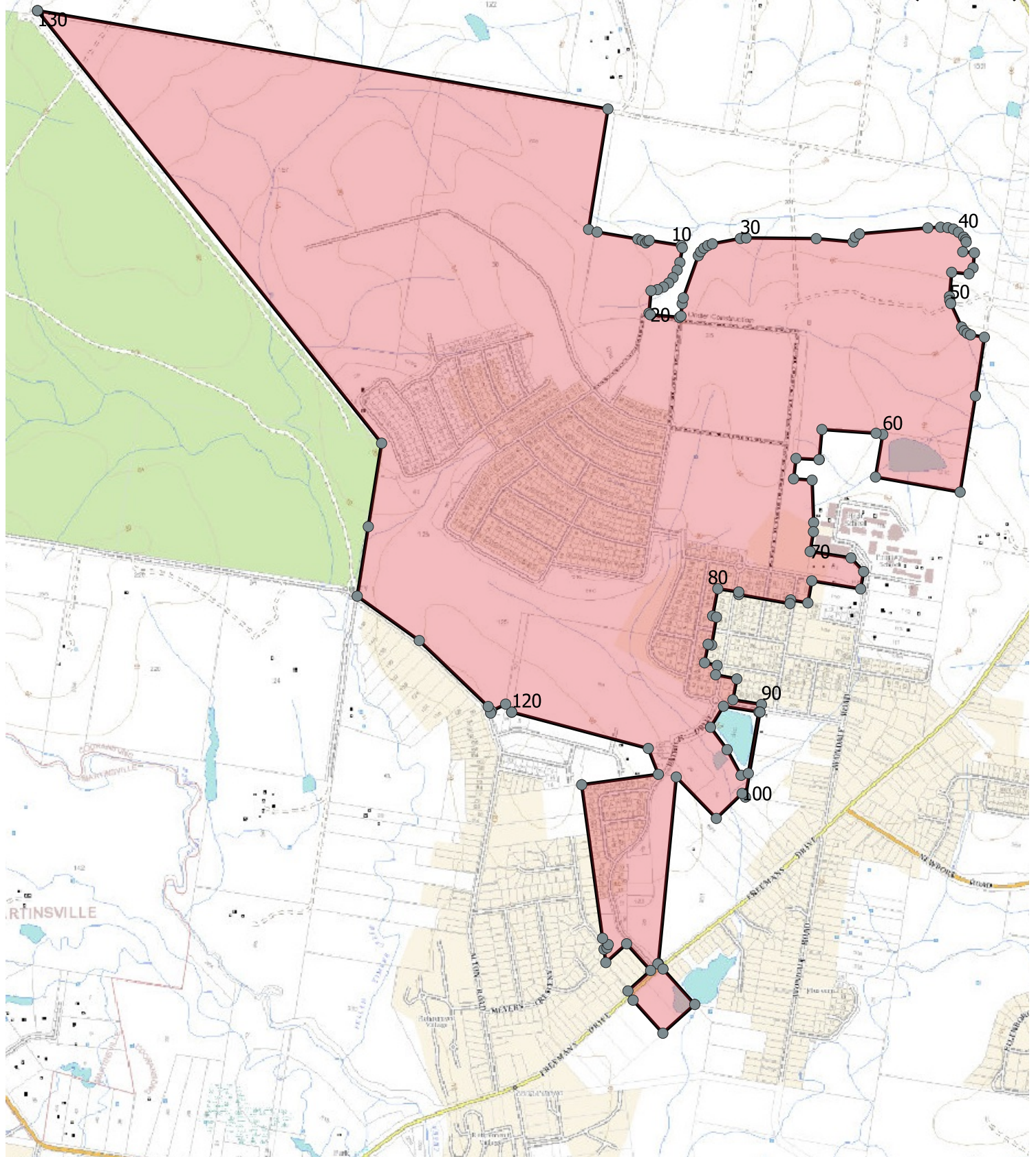
Cooranbong Local Water Centre (treatment plant)



Cooranbong Network Operator Recycled water



Cooranbong Network Operator Drinking water and sewerage



Legend

- Vertices
- Area of Operations
(Drinking water and sewerage reticulation network)



B Draft Retail Supplier Licence



NEW SOUTH WALES GOVERNMENT

Water Industry Competition Act 2006 (NSW)

Retail supplier's licence

Licence no. 13_001R

Altogether Group Pty Ltd

(ACN 136 272 298)

PRELIMINARY

1. Summary

- 1.1. This Licence is granted under section 10(1) of the Act.
- 1.2. The Act prohibits a person from supplying water, or providing a sewerage service, by means of any water industry infrastructure, otherwise than under the authority of a licence. This Licence authorises the Licensee and other Authorised Persons to carry out such activities that would otherwise be prohibited under the Act.

2. Outline

- 2.1. This Licence is divided into the following sections and schedules:

Section 1 authorises the supply of non-potable water (if applicable).
Section 2 authorises the supply of drinking water (if applicable).
Section 3 authorises the supply of sewerage services (if applicable).
Schedule A sets out special Ministerially-imposed licence conditions that are specific to this Licence.
Schedule B sets out Ministerially-imposed licence conditions that generally apply to retail suppliers' licences granted under the Act.
Schedule C sets out relevant scheme details.
Schedule D sets out the area of operations for the retail of non-potable water for the North Cooranbong Scheme.
Schedule E sets out the area of operations for the retail of drinking water and sewerage services for the North Cooranbong Scheme.
Schedule F provides indicative maps for the North Cooranbong Scheme included for reference only.
Schedule G sets out the area of operations for the retail of non-potable water for the Box Hill North Scheme.

<p>Schedule H provides an indicative map for the Box Hill North Scheme included for reference only.</p>
<p>Schedule I sets out definitions and interpretation provisions.</p>

- 2.2. In addition to the conditions in Schedules A and B to this Licence, the Act and Regulation also contain conditions that apply to this Licence. Nothing in Schedules A or B modify or affect the conditions imposed on this Licence by the Act or Regulation.
- 2.3. Where there is an inconsistency between, on one hand, Schedule D or Schedule E and, on the other hand, Schedule F, Schedule D and E prevail over Schedule F to the extent of the inconsistency.
- 2.4. Where there is an inconsistency between Schedule G and Schedule H, Schedule G prevails over Schedule H to the extent of the inconsistency.

SECTION 1 – ACTIVITIES AUTHORISED - NON-POTABLE WATER SUPPLY

Subject to the conditions imposed by the Act, the Regulation and Schedules A and B of this Licence, this Licence authorises the Licensee and any Authorised Persons specified in Table 1.1 to supply non-potable water:

- a) by means of the water industry infrastructure specified in Table 1.2
- b) to the persons or classes of persons specified in Table 1.3
- c) within the Area of Operations specified in Table 1.4, and
- d) for one or more of the Authorised Purposes for non-potable water specified in Table 1.5.

Table 1.1 Authorised Persons

[Not applicable]

Table 1.2 Water industry infrastructure

The water industry infrastructure detailed in Schedule C, Table C.1.
--

Table 1.3 Person or classes of persons

Persons within the Area of Operations detailed in Schedule C, Table C.1.
--

Table 1.4 Area of Operations

The Area of Operations detailed in Schedule C, Table C.1.

Table 1.5 Authorised Purposes for non-potable water

The Authorised Purposes detailed in Schedule C, Table C.1.
--

SECTION 2 – ACTIVITIES AUTHORISED - DRINKING WATER SUPPLY

Subject to the conditions imposed by the Act, the Regulation and Schedules A and B of this Licence, this Licence authorises the Licensee and any Authorised Persons specified in Table 2.1 to supply drinking water:

- a) by means of the water industry infrastructure specified in Table 2.2
- b) to the persons or classes of persons specified in Table 2.3
- c) within the Area of Operations specified in Table 2.4, and
- d) for one or more of the Authorised Purposes for drinking water specified in Table 2.5.

Table 2.1 Authorised Persons

[Not applicable]

Table 2.2 Water industry infrastructure

The water industry infrastructure detailed in Schedule C, Table C.2.

Table 2.3 Person or classes of persons

Persons within the Area of Operations detailed in Schedule C, Table C.2.

Table 2.4 Area of Operations

The Area of Operations detailed in Schedule C, Table C.2.

Table 2.5 Authorised Purposes for drinking water

The Authorised Purposes detailed in Schedule C, Table C.2.

SECTION 3 – ACTIVITIES AUTHORISED - SEWERAGE SERVICES

Subject to the conditions imposed by the Act, the Regulation and Schedules A and B of this Licence, this Licence authorises the Licensee and any Authorised Persons specified in Table 3.1 to provide sewerage services:

- a) by means of the water industry infrastructure specified in Table 3.2
- b) to the persons or classes of persons specified in Table 3.3
- c) within the Area of Operations specified in Table 3.4, and
- d) for one or more of the Authorised Purposes for sewerage services specified in Table 3.5.

Table 3.1 Authorised Persons

[Not applicable]

Table 3.2 Water industry infrastructure

The water industry infrastructure detailed in Schedule C, Table C.3.
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Table 3.3 Person or classes of persons

Persons within the Area of Operations detailed in Schedule C, Table C.3.
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Table 3.4 Area of Operations

The Area of Operations detailed in Schedule C, Table C.3.

Table 3.5 Authorised Purposes for sewerage services

The Authorised Purposes detailed in Schedule C, Table C.3.
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SCHEDULE A – SPECIAL MINISTERIALLY-IMPOSED LICENCE CONDITIONS

This schedule sets out the conditions which the Minister imposes pursuant to section 13(1)(b) of the Act. In addition to these special Ministerially-imposed conditions, the Licensee is subject to obligations imposed by the Act, the Regulation and the standard Ministerially-imposed licence conditions set out in Schedule B. The Minister may vary the conditions in this schedule or impose new conditions, provided there is no inconsistency with the conditions imposed by the Act or the Regulation.

1. If requested by IPART, the Licensee must prepare and provide IPART with:
 - a) a report, to IPART's satisfaction, outlining:
 - (i) evidence of discussions with intended customer(s) or formal agreement(s) with customer(s); and
 - (ii) the curriculum vitae of the key personnel involved in the operation and management of the activities authorised by this Licence, and
 - b) a statement:
 - (i) identifying any third party providing customer services under this Licence; and
 - (ii) outlining the enforceable controls the Licensee has in place to enable it to effectively respond to any suspected breaches of these Licence conditions.

SCHEDULE B – GENERAL MINISTERIALLY-IMPOSED LICENCE CONDITIONS

1. Ongoing capacity to operate

- 1.1. The Licensee must have the technical, financial and organisational capacity to carry out the activities authorised by this Licence. If the Licensee ceases to have this capacity, it must report this to IPART in accordance with the Reporting Manual.

2. Maintaining appropriate insurance

- 2.1. The Licensee must hold insurance that is appropriate for the size and nature of the activities that the Licensee is carrying out under this Licence.
- 2.2. The Licensee must provide a copy of each certificate of currency of the insurance maintained by the Licensee to IPART in accordance with the Reporting Manual.
- 2.3. Before commencing any of the activities authorised by this Licence, the Licensee must demonstrate that the insurance held is appropriate for the size and nature of the activities, by providing a report to IPART from an Insurance Expert that:
- a) certifies that in the Insurance Expert's opinion, the type, scope and limit of the insurance held by the Licensee is appropriate for the size and nature of the activities; and
 - b) is in the form prescribed by the Reporting Manual.
- 2.4. *[Not applicable]*
- 2.5. If, in relation to the activities authorised by this Licence, there is, or is to be a change in either of the following, the Licensee must provide a report to IPART in accordance with the Reporting Manual:
- a) the insurer or underwriting panel in respect of an insurance policy held by the Licensee; or
 - b) the type, scope or limit on the amount of insurance held by the Licensee.
- 2.6. From time to time when requested in writing by IPART, the Licensee must provide a report to IPART, in the manner and form and within the timeframes specified by IPART, from an Insurance Expert certifying that in the Insurance Expert's opinion the type, scope and limit on the amount of insurance held by the Licensee is appropriate for the size and nature of the activities that the Licensee is carrying out under this Licence.

[Note: The circumstances in which IPART may request a report under clause 2.6 include (but are not limited to) the following:

- *where IPART considers that there may be a change in the type, scope or limit on the amount of insurance held by the Licensee in relation to activities that the Licensee is carrying out under this Licence;*

- *where there is a change in the type or extent of activities authorised by this Licence; or*
- *where IPART or an approved auditor considers that the type, scope or limit on the amount of insurance held by the Licensee may not be appropriate for the size and nature of the activities that the Licensee is carrying out under this Licence.]*

3. Complying with NSW Health requirements

- 3.1. The Licensee must carry out the activities authorised by this Licence in compliance with any requirements of NSW Health that:
- a) IPART has agreed to; and
 - b) are notified from time to time to the Licensee by IPART in writing.

4. Complying with Audit Guidelines

- 4.1. The Licensee must comply with any Audit Guidelines issued by IPART.

5. Reporting in accordance with the Reporting Manual

- 5.1. The Licensee must prepare and submit reports in accordance with the Reporting Manual.

6. Reporting information in relation to the register of licences

- 6.1. The Licensee must notify IPART, and provide IPART with details, of any change in relation to the following, in accordance with the Reporting Manual within 14 days of the change:
- a) any licensed network operator or public water utility from whose water industry infrastructure the Licensee supplies water to its customers;
 - b) any source from which the water handled by the water industry infrastructure referred to in clause 6.1a) is derived;
 - c) whether or not any of the Licensee's customers are Small Retail Customers;
 - d) any order under section 54 of the Act by which the Licensee is declared to be a retailer of last resort; and
 - e) any licensed network operator or public water utility by means of whose sewerage infrastructure the Licensee provides sewerage services to its customers.

7. Delineating responsibilities

- 7.1. If a code of conduct has not been established under section 46 of the Regulation, the Licensee must, by a date specified by IPART, establish a code of conduct (Licensee's Code of Conduct) in accordance with this clause 7.
- 7.2. Before commencing to supply water or provide sewerage services by means of the Licensed Water Industry Infrastructure under this Licence or by a later date specified by IPART (if any), the Licensee's Code of Conduct must be agreed in writing between:
- a) the Licensee; and
 - b) each licensed network operator, licensed retail supplier and/or public water utility that:
 - i) supplies water or provides sewerage services by means of any water industry infrastructure that is connected to the Licensed Water Industry Infrastructure; or
 - ii) constructs, maintains or operates any water industry infrastructure that is connected to the Licensed Water Industry Infrastructure.
- 7.3. *[Not Applicable]*
- 7.4. The Licensee's Code of Conduct must set out the respective responsibilities of the entities specified in clause 7.2 by, at a minimum, providing for:
- a) who is responsible for repairing, replacing or maintaining any pipes, pumps, valves or storages or other infrastructure connecting the Licensed Water Industry Infrastructure to the other water industry infrastructure;
 - b) who is responsible for water quality;
 - c) who is liable in the event of the unavailability of water;
 - d) who is liable in the event of failure of any water industry infrastructure;
 - e) the fees and charges payable in respect of the use of the water industry infrastructure; and
 - f) who is responsible for handling customer complaints.
- 7.5. The Licensee must not contravene the Licensee's Code of Conduct to the extent that it makes the Licensee responsible or liable for the matters set out in it.

8. Infrastructure to be used

- 8.1. The Licensee must only source and supply water by means of water industry infrastructure, if that water industry infrastructure is maintained and operated by a licensed network operator or public water utility.
- 8.2. The Licensee must only provide sewerage services by means of water industry infrastructure, if that water industry infrastructure is maintained and operated by a licensed network operator or public water utility.

9. Notification of supply of water or provision of sewerage services

9.1. Each time the Licensee commences to supply water under this Licence, the Licensee must:

- a) notify IPART in accordance with the Reporting Manual that it has commenced to supply water to customers by means of the relevant Licensed Water Industry Infrastructure; and
- b) provide such notification within 10 days after such commencement.

9.2. Each time the Licensee commences to provide sewerage services under this Licence, the Licensee must:

- a) notify IPART in accordance with the Reporting Manual that it has commenced to provide sewerage services to customers by means of the relevant Licensed Water Industry Infrastructure; and
- b) provide such notification within 10 days after such commencement.

SCHEDULE C – RELEVANT SCHEME DETAILS

Table C.1 Non-potable water supply

Scheme	Water industry infrastructure	Authorised Purposes	Area of Operations
Box Hill North Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Box Hill North Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.4 of the Box Hill North Network Operator's Licence.	The Area of Operations specified in Schedule G of this licence.
Central Park Scheme	The water industry infrastructure specified in Section 1, Table 1.2A and Table 1.2B of the Altogether Central Park Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.3 of the Altogether Central Park Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.4A and Table 1.4B of the Altogether Central Park Network Operator's Licence, and Lot 2012 DP 1183894, and Lot 2012 DP 1190337.
Discovery Point Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Altogether Discovery Point Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.3 of the Altogether Discovery Point Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.4 of the Altogether Discovery Point Network Operator's Licence.
Glossodia Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Glossodia Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.4 of the Glossodia Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.3 of the Glossodia Network Operator's Licence.
Green Square Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Altogether Green Square Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.4 of the Altogether Green Square Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.3 of the Altogether Green Square Network Operator's Licence.
Huntlee Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Altogether Huntlee Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.4 of the Altogether Huntlee Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.3 of the Altogether Huntlee Network Operator's Licence.
North Cooranbong Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Altogether Cooranbong Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.4 of the Altogether Cooranbong Network Operator's Licence.	The Area of Operations specified in Schedule D of this licence.

Scheme	Water industry infrastructure	Authorised Purposes	Area of Operations
Pitt Town Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Altogether Pitt Town Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.3 of the Altogether Pitt Town Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.4 of the Altogether Pitt Town Network Operator's Licence.
Shepherds Bay Scheme	The water industry infrastructure specified in Section 1, Table 1.2 of the Shepherds Bay Network Operator's Licence.	The Authorised Purposes specified in Section 1, Table 1.2 and Table 1.4 of the Shepherds Bay Network Operator's Licence.	The Area of Operations specified in Section 1, Table 1.3 of the Shepherds Bay Network Operator's Licence.
Wyee Scheme	The water industry infrastructure specified in Schedule A, Table 1.2 of the Altogether Wyee Network Operator's Licence.	The Authorised Purposes specified in Schedule A, Table 1.3 of the Altogether Wyee Network Operator's Licence.	The Area of Operations specified in Schedule A, Table 1.4 of the Altogether Wyee Network Operator's Licence.

Table C.2 – Drinking water supply

Scheme	Water industry infrastructure	Authorised Purposes	Area of Operations
Central Park Scheme	The water industry infrastructure specified in Section 2, Table 2.2 of the Altogether Central Park Network Operator's Licence.	The Authorised Purposes specified in Section 2, Table 2.2 of the Altogether Central Park Network Operator's Licence.	The Area of Operations specified in Section 2, Table 2.3 of the Altogether Central Park Network Operator's Licence., and Lot 2012 DP 1183894, and Lot 2012 DP 1190337.
Discovery Point Scheme	The water industry infrastructure specified in Section 2, Table 2.2 of the Altogether Discovery Point Network Operator's Licence.	The Authorised Purposes specified in Section 2, Table 2.3 of the Altogether Discovery Point Network Operator's Licence.	The Area of Operations specified in Section 2, Table 2.4 of the Altogether Discovery Point Network Operator's Licence.
Huntlee Scheme	The water industry infrastructure specified in Section 2, Table 2.2 of the Altogether Huntlee Network Operator's Licence.	The Authorised Purposes specified in Section 2, Table 2.2 of the Altogether Huntlee Network Operator's Licence.	The Area of Operations specified in Section 2, Table 2.3 of the Altogether Huntlee Network Operator's Licence.
North Cooranbong Scheme	The water industry infrastructure specified in Section 2, Table 2.2 of the Altogether Cooranbong Network Operator's Licence.	The Authorised Purposes specified in Section 2, Table 2.2 of the Altogether Cooranbong Network Operator's Licence.	The Area of Operations specified in Schedule E of this licence.
Shepherds Bay Scheme	The water industry infrastructure specified in Section 2, Table 2.2 of the Shepherds Bay Network Operator's Licence.	The Authorised Purposes specified in Section 2, Table 2.2 of the Shepherds Bay Network Operator's Licence.	The Area of Operations specified in Section 2, Table 2.3 of the Shepherds Bay Network Operator's Licence.
Wyee Scheme	The water industry infrastructure specified in Schedule A, Table 2.2 of the Altogether Wyee Network Operator's Licence.	The Authorised Purposes specified in Schedule A, Table 2.3 of the Altogether Wyee Network Operator's Licence.	The Area of Operations specified in Schedule A, Table 2.4 of the Altogether Wyee Network Operator's Licence.

Table C.3 Provision of sewerage services

Scheme	Water industry infrastructure	Authorised Purposes	Area of Operations
Box Hill North Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Box Hill North Network Operator's Licence.	The Authorised Purposes specified in Section, Table 3.2 of the Box Hill North Network Operator's Licence.	Area bounded by the vertices listed in Table E.2 in the Box Hill North Network Operator's Licence.
Central Park Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Altogether Central Park Network Operator's Licence.	The Authorised Purposes specified in Section, Table 3.2 of the Altogether Central Park Network Operator's Licence.	The Area of Operations specified in Section 3, Table 3.3 of the Altogether Central Park Network Operator's Licence, and Lot 2012 DP 1183894, and Lot 2012 DP 1190337.
Discovery Point Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Altogether Discovery Point Network Operator's Licence.	The Authorised Purposes specified in Section 3, Table 3.3 of the Altogether Discovery Point Network Operator's Licence.	The Area of Operations specified in Section 3, Table 3.4 of the Altogether Discovery Point Network Operator's Licence.
Glossodia Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Glossodia Network Operator's Licence.	The Authorised Purposes specified in Section 3, Table 3.2 of the Glossodia Network Operator's Licence.	The Area of Operations specified in Section 3, Table 3.3 of the Glossodia Network Operator's Licence.
Huntlee Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Altogether Huntlee Network Operator's Licence.	The Authorised Purposes specified in Section 3, Table 3.2 of the Altogether Huntlee Network Operator's Licence.	The Area of Operations specified in Section 3, Table 3.3 of the Altogether Huntlee Network Operator's Licence.
North Cooranbong Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Altogether Cooranbong Network Operator's Licence.	The Authorised Purposes specified in Section 3, Tables 3.2 of the Altogether Cooranbong Network Operator's Licence.	The Area of Operations specified in Schedule E of this licence.
Pitt Town Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Altogether Pitt Town Network Operator's Licence.	The Authorised Purposes specified in Section 3, Table 3.3 of the Altogether Pitt Town Network Operator's Licence.	The Area of Operations specified in Section 3, Table 3.4 of the Altogether Pitt Town Network Operator's Licence.

Scheme	Water industry infrastructure	Authorised Purposes	Area of Operations
Shepherds Bay Scheme	The water industry infrastructure specified in Section 3, Table 3.2 of the Shepherds Bay Network Operator's Licence.	The Authorised Purposes specified in Section 3, Table 3.2 of the Shepherds Bay Network Operator's Licence.	The Area of Operations specified in Section 3, Table 3.3 of the Shepherds Bay Network Operator's Licence.
Wyee Scheme	The water industry infrastructure specified in Schedule A, Table 3.2 of the Altogether Wyee Network Operator's Licence.	The Authorised Purposes specified in Schedule A, Table 3.3 of the Altogether Wyee Network Operator's Licence.	The Area of Operations specified in Schedule A, Table 3.4 of the Altogether Wyee Network Operator's Licence.

**SCHEDULE D – AREA OF OPERATIONS – NORTH COORANBONG SCHEME - RETAIL
OF NON-POTABLE WATER**

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
1	354351.202	6342167.55	46	356970.004	6341447.536
2	355947.934	6341892.376	47	356958.5022	6341430.795
3	355894.9019	6341555.412	48	356910.2436	6341435.186
4	355917.771	6341547.83	49	356904.0868	6341367.364
5	356031.5262	6341528.329	50	356904.8169	6341356.571
6	356043.519	6341524.023	51	356907.5832	6341347.884
7	356053.7789	6341517.656	52	356937.9665	6341282.014
8	356059.261	6341523.278	53	356945.1096	6341271.521
9	356063.6657	6341524.442	54	356953.5704	6341264.533
10	356153.4323	6341510.022	55	356963.0002	6341260.149
11	356156.084	6341503.831	56	357001.7426	6341253.436
12	356149.3958	6341462.815	57	356976.796	6341088.994
13	356141.8295	6341441.202	58	356954.0185	6340948.312
14	356130.219	6341420.268	59	356885.17	6340514.852
15	356117.9658	6341405.026	60	356871.355	6340438.179
16	356103.4837	6341393.866	61	356663.5	6340472.232
17	356086.71	6341386.607	62	356675.399	6340545.157
18	356068.6555	6341383.683	63	356655.424	6340548.976
19	356062.9218	6341320.683	64	356654.135	6340541.077
20	356066.5417	6341316.339	65	356517.39	6340564.916
21	356148.1916	6341308.907	66	356507.647	6340509.879
22	356152.536	6341312.527	67	356459.461	6340518.274
23	356155.7855	6341347.523	68	356457.642	6340507.902
24	356159.0312	6341363.55	69	356346.515	6340527.26
25	356200.9918	6341481.612	70	356343.352	6340509.238
26	356207.3885	6341492.743	71	356314.239	6340533.244
27	356216.5725	6341502.651	72	356314.179	6340540.351
28	356227.7845	6341510.189	73	356255.557	6340549.401
29	356240.426	6341514.954	74	356241.003	6340473.322
30	356318.5379	6341529.796	75	356251.795	6340469.873
31	356335.2867	6341531.355	76	356238.394	6340391.931
32	356531.1755	6341529.481	77	356228.412	6340393.983
33	356634.189	6341520.105	78	356218.483	6340342.249
34	356640.249	6341533.688	79	356253.676	6340334.913
35	356652.058	6341542.73	80	356249.597	6340308.5
36	356843.4335	6341559.485	81	356308.787	6340296.974
37	356878.9466	6341561.374	82	356297.856	6340238.541
38	356899.3864	6341560.188	83	356377.774	6340225.556
39	356915.0473	6341556.156	84	356373.42	6340204.076
40	356929.2233	6341547.347	85	356271.293	6340220.551
41	356943.7824	6341533.631	86	356235.132	6340161.656
42	356949.5473	6341526.21	87	356281.62	6340098.924
43	356950.8679	6341520.039	88	356320.705	6340027.191
44	356941.1511	6341492.611	89	356341.037	6340032.67
45	356973.8359	6341489.636	90	356370.5472	6340204.549

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
91	356373.42	6340204.076	139	357057.305	6338119.27
92	356332.72	6339966.2	140	357077.271	6338097.075
93	356323.68	6339976.503	141	357128.181	6338050.226
94	356251.424	6339906.549	142	357139.09	6338035.84
95	356139.306	6340022.406	143	357148.432	6338018.099
96	356089.208	6339500.483	144	357156.626	6337990.783
97	356087.789	6339499.202	145	357159.053	6337968.431
98	356102.181	6339485.034	146	357155.067	6337887.123
99	356191.06	6339385.868	147	357154.092	6337795.911
100	355937.522	6339157.174	148	357151.46	6337765.757
101	355789.484	6339135.747	149	357146.483	6337740.862
102	355823.99	6338896.791	150	357141.282	6337728.138
103	356022.96	6338925.561	151	357134.217	6337720.335
104	355991.422	6339144.609	152	357129.899	6337718.766
105	356208.677	6339176.1	153	357122.626	6337719.477
106	356179.897	6339009.081	154	357083.566	6337736.741
107	356237.327	6338610.893	155	357060.438	6337739.628
108	356323.194	6338606.372	156	356970.175	6337733.11
109	356541.862	6338568.677	157	356944.901	6337728.143
110	356461.448	6338420.286	158	356924.937	6337721.49
111	356360.085	6338292.326	159	356898.036	6337708.456
112	356379.966	6338285.023	160	356827.537	6337668.706
113	356478.322	6338409.186	161	356812.079	6337658.359
114	356491.967	6338434.366	162	356798.456	6337644.524
115	356583.626	6338418.63	163	356774.83	6337607.347
116	356568.24	6338323.669	164	356749.512	6337576.753
117	356564.4	6338288.775	165	356729.659	6337560.557
118	356632.717	6338280.794	166	356719.021	6337554.535
119	356650.797	6338281.006	167	356707.984	6337550.261
120	356667.081	6338284.079	168	356696.6	6337548.003
121	356677.615	6338288.388	169	356684.93	6337548.037
122	356690.821	6338297.576	170	356669.313	6337551.811
123	356701.291	6338309.423	171	356659.201	6337556.39
124	356707.446	6338319.488	172	356645.305	6337565.713
125	356715.979	6338343.113	173	356630.071	6337582.178
126	356724.12	6338391.561	174	356605.665	6337621.93
127	356730.598	6338406.37	175	356595.272	6337636.101
128	356740.16	6338418.374	176	356587.399	6337644.616
129	356760.131	6338433.63	177	356572.436	6337656.603
130	356782.202	6338443.8	178	356512.4	6337689.775
131	356794.858	6338444.699	179	356467.177	6337724.255
132	356800.975	6338443.328	180	356442.995	6337739.787
133	356812.552	6338437.552	181	356416.211	6337752.561
134	356828.367	6338423.535	182	356402.043	6337757.421
135	356842.534	6338406.662	183	356372.506	6337763.101
136	356871.883	6338367.906	184	356341.909	6337762.078
137	356950.591	6338257.692	185	356303.336	6337753.093
138	357015.507	6338182.036	186	356283.783	6337750.228

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
187	356227.799	6337753.936	235	355571.706	6338121.62
188	356208.007	6337752.754	236	355575.121	6338135.698
189	356188.975	6337749.313	237	355589.232	6338157.565
190	356163.564	6337739.138	238	355592.667	6338168.36
191	356127.395	6337710.74	239	355592.554	6338179.843
192	356115.225	6337704.819	240	355589.5	6338191.935
193	356108.549	6337703.598	241	355584.123	6338204.55
194	356080.63	6337705.924	242	355544.151	6338272.612
195	356064.585	6337704.465	243	355535.27	6338294.306
196	356048.835	6337700.71	244	355532.803	6338312.183
197	356033.242	6337695.179	245	355537.47	6338356.543
198	355952.454	6337658.915	246	355537.246	6338368.528
199	355927.221	6337651.857	247	355524.16	6338415.775
200	355875.651	6337642.426	248	355525.116	6338444.681
201	355835.893	6337626.488	249	355533.334	6338498.338
202	355808.209	6337619.778	250	355533.522	6338529.908
203	355777.564	6337617.681	251	355669.898	6338549.521
204	355747.644	6337621.442	252	355636.35	6338788.534
205	355724.248	6337630.446	253	355468.237	6338764.361
206	355711.822	6337638.722	254	355487.326	6338787.426
207	355702.739	6337648.155	255	355442.354	6338780.96
208	355697.718	6337658.175	256	355466.927	6338810.724
209	355696.944	6337663.227	257	355481.2	6338831.173
210	355699.137	6337673.375	258	355490.489	6338850.898
211	355705.629	6337683.3	259	355492.387	6338860.167
212	355715.381	6337693.055	260	355491.979	6338868.864
213	355766.421	6337731.497	261	355488.92	6338876.861
214	355777.023	6337741.236	262	355471.68	6338896.155
215	355784.7	6337751.138	263	355464.968	6338906.184
216	355788.416	6337761.252	264	355476.224	6338934.33
217	355788.237	6337768.359	265	355487.474	6338985.016
218	355785.947	6337775.517	266	355487.859	6339017.782
219	355776.039	6337789.685	267	355474.265	6339058.219
220	355751.709	6337809.401	268	355430.823	6339049.207
221	355722.14	6337825.412	269	355436.95	6338912.439
222	355664.478	6337849.849	270	355406.717	6338958.67
223	355623.398	6337879.835	271	355406.358	6338907.672
224	355577.571	6337906.259	272	355413.213	6338797.484
225	355568.552	6337915.18	273	355384.111	6338766.488
226	355563.288	6337923.986	274	355088.71	6338812.032
227	355558.383	6337940.049	275	355071.304	6338833.685
228	355551.022	6337977.644	276	355086.255	6338847.995
229	355549.694	6337996.799	277	355158.717	6338902.9
230	355553.502	6338007.619	278	355095.724	6338985.464
231	355575.736	6338033.84	279	355100.718	6339019.034
232	355580.519	6338044.388	280	354999.703	6339034.136
233	355581.284	6338059.65	281	354949.398	6339055.461
234	355572.917	6338104.716	282	354914.031	6339100.776

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
283	354903.507	6339161.362	328	355563.591	6339208.953
284	354918.454	6339213.79	329	355612.134	6339223.461
285	354957.362	6339261.672	330	355612.676	6339220.288
286	355021.02	6339258.656	331	355560.59	6339204.72
287	355086.915	6339223.704	332	355565.736	6339187.531
288	355127.205	6339197.814	333	355578.941	6339191.213
289	355168.759	6339160.845	334	355583.743	6339175.155
290	355267.779	6339044.49	335	355603.4	6339181.31
291	355310.268	6339070.545	336	355618.998	6339183.498
292	355365.957	6339088.034	337	355625.758	6339144.186
293	355379.99	6339067.128	338	355644.31	6339154.984
294	355400.952	6339076.576	339	355624.978	6339267.451
295	355421.386	6339083.221	340	355665.816	6339279.628
296	355463.912	6339091.639	341	355663.172	6339294.965
297	355459.857	6339106.392	342	355765.526	6339309.428
298	355450.412	6339120.055	343	355761.361	6339339.956
299	355438.766	6339129.748	344	355850.965	6339420.836
300	355418.701	6339140.528	345	355885.393	6339382.592
301	355392.201	6339146.316	346	355897.437	6339393.442
302	355349.138	6339145.765	347	355898.88	6339391.848
303	355338.486	6339146.942	348	355916.729	6339407.919
304	355330.775	6339150.025	349	355921.333	6339402.81
305	355316.257	6339161.308	350	355951.189	6339429.749
306	355282.106	6339168.685	351	355910.715	6339474.699
307	355263.885	6339177.871	352	355942.156	6339503.049
308	355253.8	6339186.14	353	355937.149	6339540.083
309	355241.041	6339201.008	354	355945.422	6339544.484
310	355204.633	6339258.674	355	355948.837	6339553.537
311	355190.176	6339273.423	356	355932.958	6339571.07
312	355163.813	6339293.915	357	355874.564	6340000.771
313	355149.188	6339307.418	358	356089.192	6340029.935
314	355139.657	6339319.91	359	356060.937	6340102.361
315	355127.374	6339341.677	360	355678.579	6340204.001
316	355123.261	6339346.423	361	355678.5746	6340204.001
317	355117.42	6339349.312	362	355661.6883	6340226.428
318	355109.942	6339349.842	363	355622.1038	6340206.968
319	355068.536	6339345.162	364	355619.6735	6340201.311
320	355117.678	6339652.623	365	355612.8443	6340219.758
321	355550.242	6339583.617	366	355419.9318	6340404.335
322	355576.358	6339431.622	367	355246.241	6340528.697
323	355525.521	6339425.709	368	355277.225	6340723.274
324	355531.916	6339389.628	369	355299.7434	6340864.853
325	355583.099	6339392.407	370	355314.438	6340956.788
326	355586.53	6339372.449	371	354351.202	6342167.55
327	355535.45	6339369.686			

¹ Coordinate reference system is MGA 56

**SCHEDULE E – AREA OF OPERATIONS – NORTH COORANBONG SCHEME - RETAIL
OF DRINKING WATER AND SEWERAGE SERVICES**

Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
1	354351.202	6342167.55	46	356970.004	6341447.536
2	355947.934	6341892.376	47	356958.5022	6341430.795
3	355894.2666	6341554.769	48	356910.2436	6341435.186
4	355917.771	6341547.83	49	356904.0868	6341367.364
5	356031.5262	6341528.329	50	356904.8169	6341356.571
6	356043.519	6341524.023	51	356907.5832	6341347.884
7	356053.7789	6341517.656	52	356937.9665	6341282.014
8	356059.261	6341523.278	53	356945.1096	6341271.521
9	356063.6657	6341524.442	54	356953.5704	6341264.533
10	356153.4323	6341510.022	55	356963.0002	6341260.149
11	356156.084	6341503.831	56	357001.7426	6341253.436
12	356149.3958	6341462.815	57	356976.796	6341088.994
13	356141.8295	6341441.202	58	356952.7488	6340948.513
14	356130.219	6341420.268	59	356885.17	6340514.852
15	356117.9658	6341405.026	60	356871.355	6340438.179
16	356103.4837	6341393.866	61	356663.5	6340472.232
17	356086.71	6341386.607	62	356675.399	6340545.157
18	356068.6555	6341383.683	63	356655.424	6340548.976
19	356062.9218	6341320.683	64	356654.135	6340541.077
20	356066.5417	6341316.339	65	356517.39	6340564.916
21	356148.1916	6341308.907	66	356507.647	6340509.879
22	356152.536	6341312.527	67	356459.461	6340518.274
23	356155.7855	6341347.523	68	356457.642	6340507.902
24	356159.0312	6341363.55	69	356314.239	6340533.244
25	356200.9918	6341481.612	70	356314.179	6340540.351
26	356207.3885	6341492.743	71	356255.557	6340549.401
27	356216.5725	6341502.651	72	356241.003	6340473.322
28	356227.7845	6341510.189	73	356251.795	6340469.873
29	356240.426	6341514.954	74	356238.394	6340391.931
30	356318.5379	6341529.796	75	356228.412	6340393.983
31	356335.2867	6341531.355	76	356218.483	6340342.249
32	356531.1755	6341529.481	77	356253.676	6340334.913
33	356634.189	6341520.105	78	356249.597	6340308.5
34	356640.249	6341533.688	79	356308.787	6340296.974
35	356652.058	6341542.73	80	356297.856	6340238.541
36	356843.4335	6341559.485	81	356377.774	6340225.556
37	356878.9466	6341561.374	82	356373.42	6340204.076
38	356899.3864	6341560.188	83	356271.293	6340220.551
39	356915.0473	6341556.156	84	356235.132	6340161.656
40	356929.2233	6341547.347	85	356281.62	6340098.924
41	356943.7824	6341533.631	86	356320.705	6340027.191
42	356949.5473	6341526.21	87	356341.037	6340032.67
43	356950.8679	6341520.039	88	356370.51	6340204.431
44	356941.1511	6341492.611	89	356373.42	6340204.076
45	356973.8359	6341489.636	90	356332.72	6339966.2

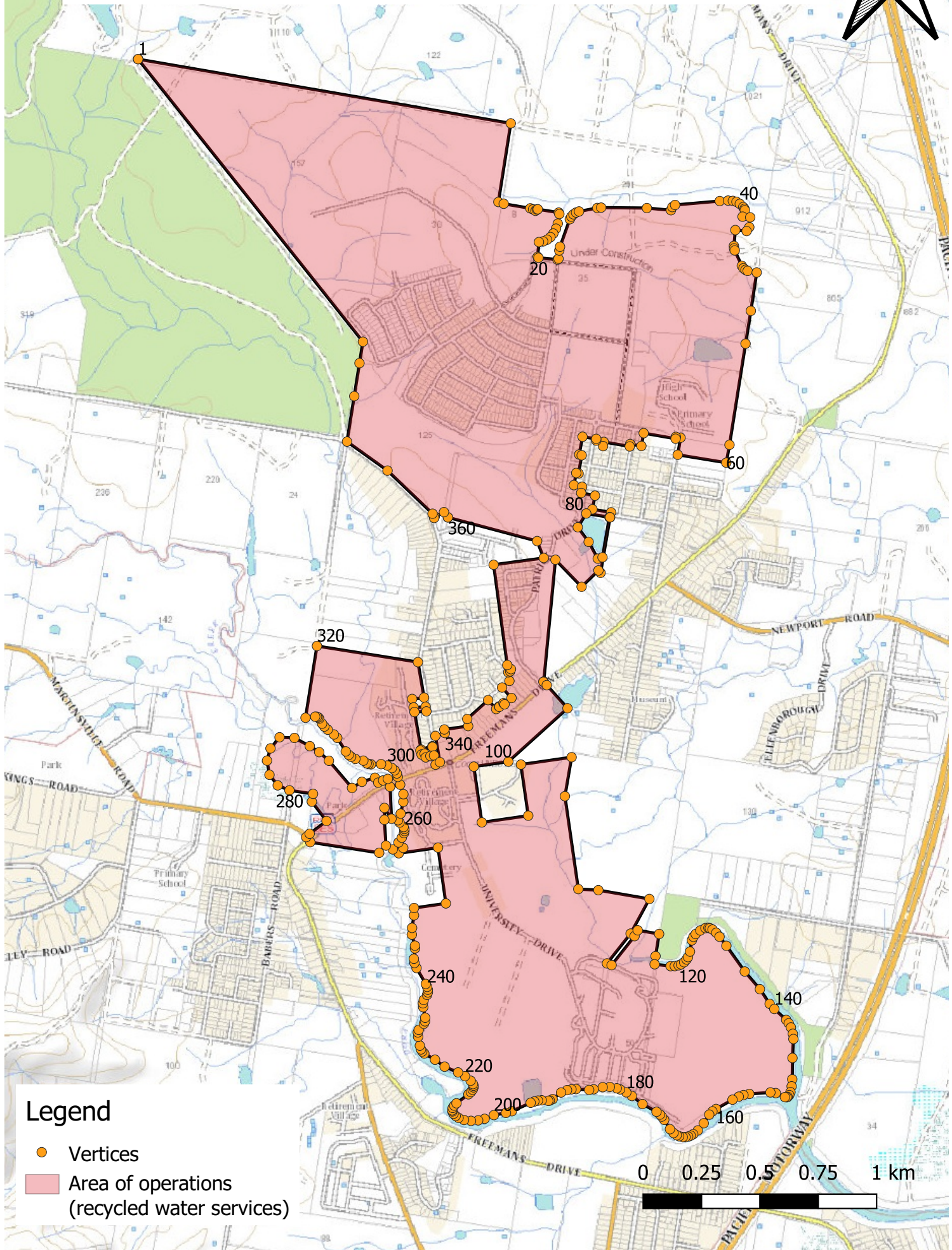
Coordinates ¹

Vertex	Easting	Northing
91	356323.68	6339976.503
92	356251.424	6339906.549
93	356139.306	6340022.406
94	356089.208	6339500.483
95	356087.789	6339499.202
96	356102.181	6339485.034
97	356191.06	6339385.868
98	356101.721	6339305.283
99	356018.411	6339397.769
100	356004.08	6339423.674
101	356067.507	6339480.903
102	356000.322	6339555.491
103	355942.156	6339503.049
104	355937.149	6339540.083
105	355945.422	6339544.484
106	355948.837	6339553.537
107	355932.958	6339571.07
108	355874.564	6340000.771
109	356089.192	6340029.935
110	356060.937	6340102.361
111	355678.579	6340204.001
112	355678.5746	6340204.001
113	355661.6883	6340226.428
114	355622.1038	6340206.968
115	355619.6735	6340201.311
116	355612.8443	6340219.758
117	355419.9318	6340404.335
118	355246.241	6340528.697
119	355277.225	6340723.274
120	355314.438	6340956.788
121	354351.202	6342167.55

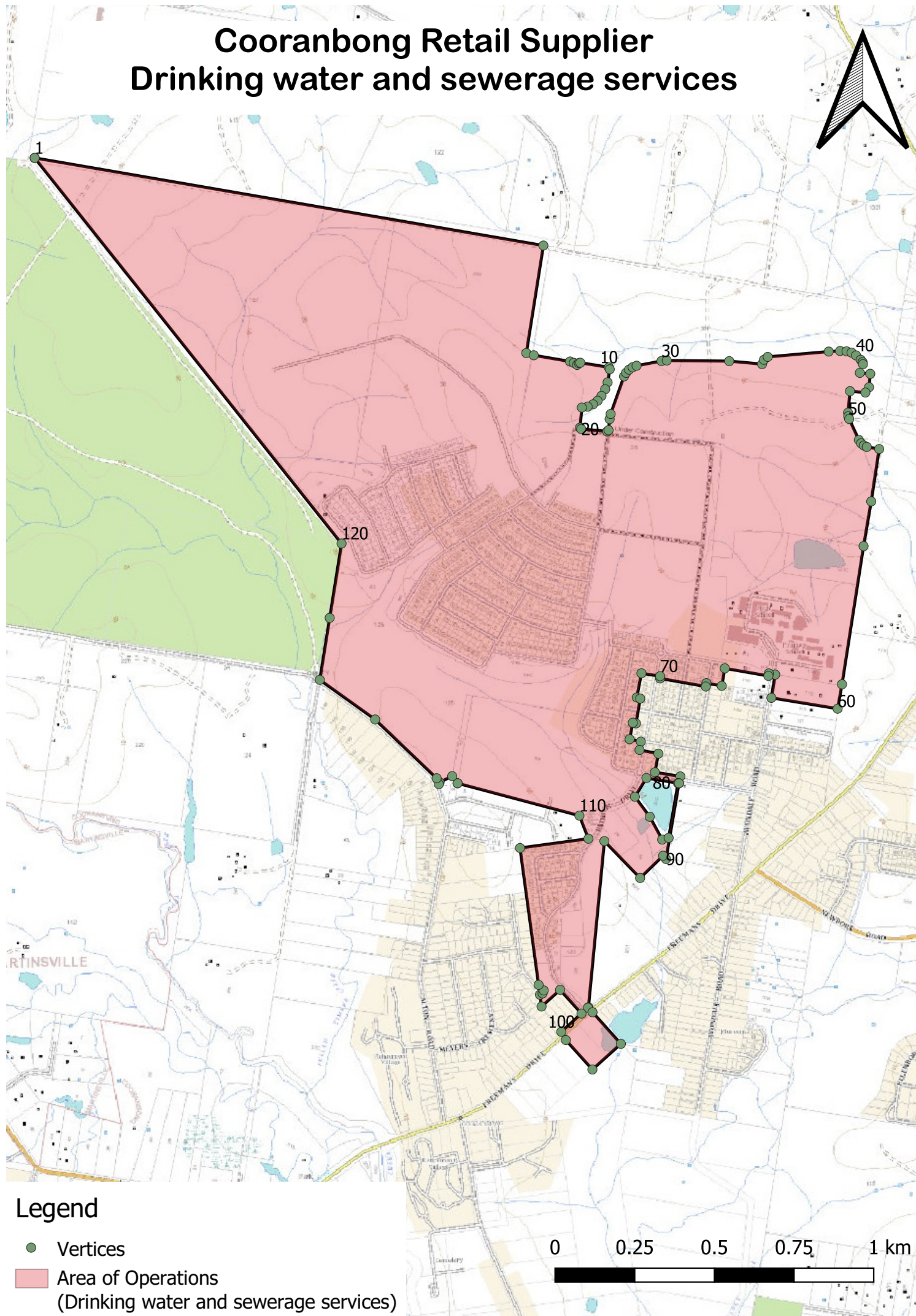
¹ Coordinate reference system is MGA 56

SCHEDULE F – AREA OF OPERATIONS – NORTH COORANBONG SCHEME – MAPS

Cooranbong Retail Supplier Recycled water



Cooranbong Retail Supplier Drinking water and sewerage services



**SCHEDULE G – AREA OF OPERATIONS – BOX HILL NORTH SCHEME - RETAIL OF
NON-POTABLE WATER**

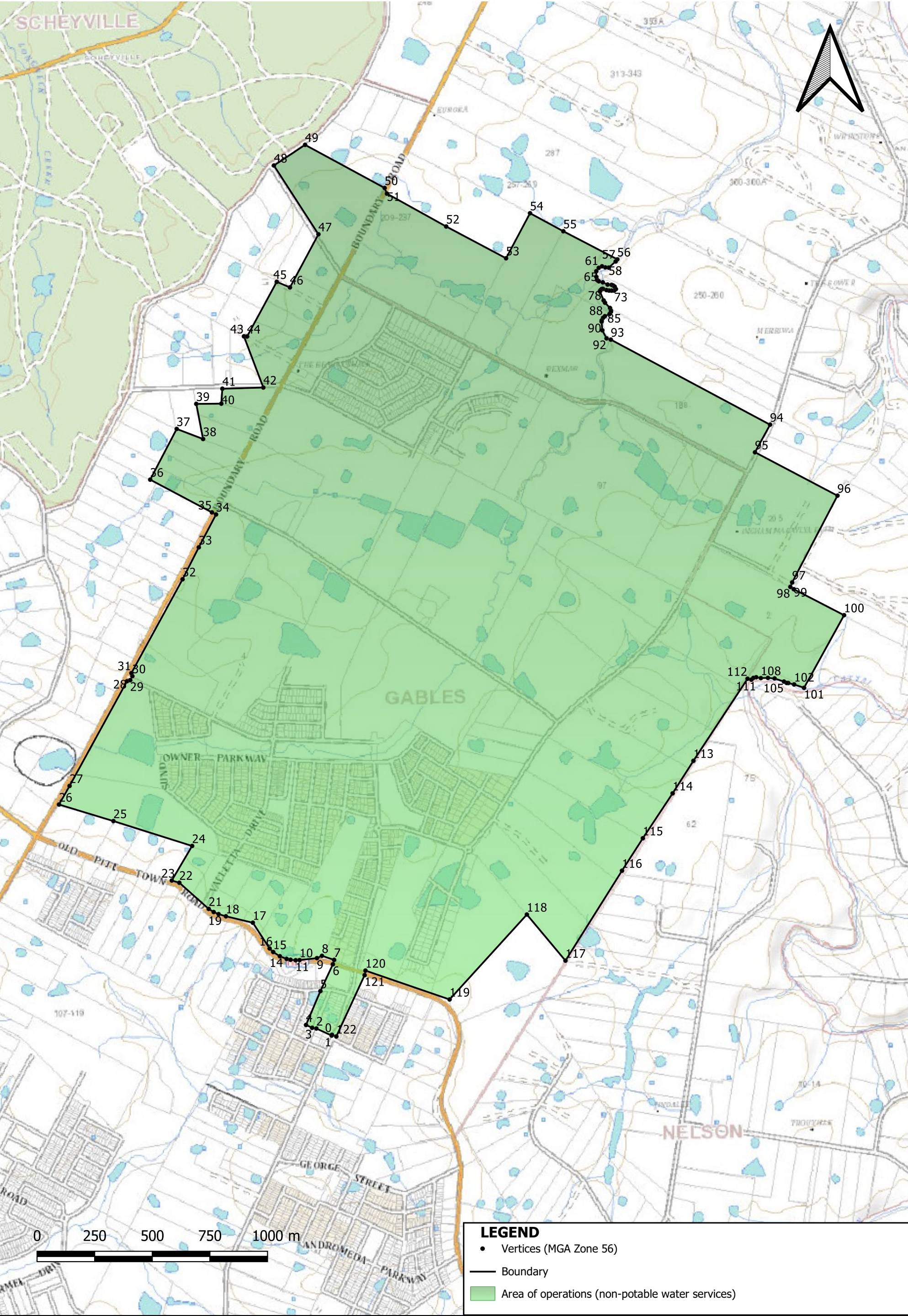
Coordinates ¹			Coordinates ¹		
Vertex	Easting	Northing	Vertex	Easting	Northing
0	305539.186	6275618.928	47	305480.576	6279095.292
1	305537.828	6275615.986	48	305287.488	6279393.798
2	305471.676	6275646.504	49	305422.613	6279483.497
3	305453.487	6275649.748	50	305767.766	6279296.364
4	305426.757	6275662.016	51	305777.773	6279271.682
5	305489.200	6275809.070	52	306034.852	6279128.993
6	305543.262	6275925.511	53	306294.774	6278990.969
7	305548.612	6275944.592	54	306398.716	6279186.591
8	305495.867	6275962.174	55	306543.137	6279108.345
9	305473.992	6275952.145	56	306777.488	6278986.353
10	305398.799	6275943.563	57	306770.309	6278977.063
11	305381.457	6275942.830	58	306739.888	6278950.473
12	305359.557	6275945.025	59	306725.543	6278951.290
13	305342.700	6275948.668	60	306710.989	6278956.211
14	305313.095	6275960.426	61	306696.750	6278949.320
15	305284.356	6275978.700	62	306686.115	6278935.009
16	305268.787	6275994.125	63	306686.479	6278910.174
17	305195.977	6276105.958	64	306689.733	6278897.139
18	305079.068	6276133.881	65	306692.002	6278894.694
19	305047.304	6276143.183	66	306697.208	6278891.026
20	305025.918	6276152.429	67	306714.354	6278886.577
21	305004.417	6276166.017	68	306735.148	6278876.813
22	304877.041	6276279.522	69	306752.608	6278875.577
23	304844.273	6276289.191	70	306759.094	6278872.744
24	304932.500	6276439.263	71	306765.834	6278867.915
25	304591.170	6276547.305	72	306771.128	6278857.238
26	304354.926	6276619.069	73	306763.787	6278850.830
27	304400.885	6276699.940	74	306752.681	6278850.434
28	304649.910	6277154.498	75	306741.552	6278850.838
29	304663.770	6277158.991	76	306730.281	6278852.841
30	304673.275	6277176.621	77	306715.318	6278858.050
31	304668.999	6277189.737	78	306709.718	6278857.701
32	304891.023	6277597.069	79	306704.253	6278852.344
33	304961.374	6277735.705	80	306702.192	6278846.980
34	305036.285	6277878.474	81	306717.961	6278807.930
35	305018.392	6277887.660	82	306723.836	6278797.970
36	304750.665	6278029.735	83	306745.576	6278775.309
37	304865.645	6278249.931	84	306749.993	6278763.706
38	304980.103	6278206.243	85	306749.829	6278758.592
39	304950.570	6278358.696	86	306743.667	6278749.140
40	305059.125	6278359.766	87	306723.422	6278739.487
41	305063.749	6278424.519	88	306715.597	6278732.417
42	305241.477	6278429.730	89	306709.664	6278721.296
43	305157.361	6278652.115	90	306709.286	6278715.994
44	305171.002	6278651.243	91	306712.250	6278678.315
45	305299.679	6278888.743	92	306730.731	6278643.189
46	305357.017	6278864.452	93	306749.275	6278637.786

Coordinates ¹		
Vertex	Easting	Northing
94	307440.257	6278268.396
95	307374.860	6278148.627
96	307732.592	6277960.187
97	307536.149	6277583.326
98	307528.270	6277564.034
99	307542.984	6277554.126
100	307761.354	6277441.219
101	307587.600	6277125.866
102	307544.684	6277140.470
103	307519.276	6277146.671
104	307512.113	6277147.028
105	307500.433	6277153.089
106	307459.792	6277166.559
107	307430.923	6277169.067
108	307400.158	6277168.107
109	307379.992	6277171.757
110	307367.595	6277168.881

Coordinates ¹		
Vertex	Easting	Northing
111	307358.912	6277161.268
112	307342.530	6277165.253
113	307107.663	6276808.954
114	307017.422	6276667.762
115	306888.240	6276472.636
116	306797.764	6276331.826
117	306552.423	6275941.227
118	306385.024	6276141.484
119	306049.627	6275772.738
120	305684.600	6275898.147
121	305680.970	6275878.177
122	305558.194	6275612.053
123	305539.186	6275618.928

¹ Coordinate reference system is MGA 56

SCHEDULE H – AREA OF OPERATIONS – BOX HILL NORTH SCHEME - MAPS



Area of Operations - Box Hill North Scheme
Non-potable water services

Date created: 4 August 2020
Version: 1.0

LEGEND

- Vertices (MGA Zone 56)
- Boundary
- Area of operations (non-potable water services)

LICENCE DETAILS:

Licence Number: 13_001R
Licence Type: Retail Supplier's Licence
Licensee: Flow Systems Pty Ltd
(ACN 136 272 298)

SCHEDULE I – INTERPRETATION AND DEFINITIONS

1. Interpretation

1.1. In this Licence, unless the context requires otherwise:

- a) the singular includes the plural and vice versa;
- b) headings are used for convenience only and do not affect the interpretation of this Licence;
- c) a reference to a document includes the document as modified from time to time and any document replacing it;
- d) a reference to a “person” includes a natural person and any body or entity whether incorporated or not;
- e) a reference to a clause is to a clause in this Licence;
- f) a reference to a section is to a section in this Licence;
- g) a reference to a schedule is to a schedule to this Licence;
- h) a reference to a law or statute includes regulations, rules, codes and other instruments under it, and consolidations, amendments, re-enactments or replacements of them; and
- i) explanatory notes do not form part of this Licence, but in the case of uncertainty may be relied on for interpretation purposes.

2. Definitions

2.1. Expressions used in this Licence that are defined in the Act or the Regulation have the meanings set out in the Act or the Regulation.

2.2. In this Licence:

Act means the *Water Industry Competition Act 2006* (NSW).

Altogether Central Park Network Operator's Licence means network operator's licence no. 12_022 granted to Altogether Central Park Pty Ltd (ACN 151 072 838) (as varied by the Minister from time to time).

Altogether Cooranbong Network Operator's Licence means network operator's licence no. 15_033 granted to Altogether Cooranbong Pty Ltd (ACN 169 450 453) (as varied by the Minister from time to time).

Altogether Discovery Point Network Operator's Licence	means network operator's licence no. 13_025 granted to Altogether Discovery Point Pty Ltd (ACN 142 392 541) (as varied by the Minister from time to time).
Altogether Green Square Network Operator's Licence	means network operator's licence no. 15_031 granted to Altogether Green Square Pty Ltd (ACN 163 432 906) (as varied by the Minister from time to time).
Altogether Huntlee Network Operator's Licence	means network operator's licence no. 15_030 granted to Altogether Huntlee Pty Ltd (ACN 167 418 608) (as varied by the Minister from time to time).
Altogether Pitt Town Network Operator's Licence	means network operator's licence no. 10_014 granted to Altogether Pitt Town Pty Ltd (ACN 141 705 660) (as varied by the Minister from time to time).
Altogether Wyee Network Operator's Licence	means network operator's licence no. 14_026 granted to Altogether Wyee Pty Ltd (ACN 160 953 775) (as varied by the Minister from time to time).
Area of Operations	means the area of operations specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.4 b) section 2, Table 2.4, and c) section 3, Table 3.4.
Audit Guidelines	means the document titled " <i>Audit Guideline under Water Industry Competition Act 2006 (NSW)</i> ", which is prepared by IPART and is available on IPART's website , and any other guidelines issued by IPART in relation to audits under the Act.
Authorised Persons	means each person specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.1 b) section 2, Table 2.1, and c) section 3, Table 3.1.

Authorised Purposes	means the authorised purposes specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.5 b) section 2, Table 2.5, and c) section 3, Table 3.5.
Box Hill North Network Operator's Licence	means network operator's licence no. 16_037 granted to Altogether Operations Pty Ltd (ACN 603 106 305) (as varied by the Minister from time to time)
Glossodia Network Operator's Licence	means network operator's licence no. 19_043 granted to Altogether Operations Pty Ltd (ACN 603 106 305) (as varied by the Minister from time to time).
Insurance Expert	means an insurance broker which holds an Australian financial services licence under Part 7.6 of the <i>Corporations Act 2001</i> (Cth) that authorises the broker to provide financial product advice for, and deal in, contracts of insurance within the meaning of Chapter 7 of that Act.
IPART	means the Independent Pricing and Regulatory Tribunal of New South Wales established under the <i>Independent Pricing and Regulatory Tribunal Act 1992</i> (NSW).
Licence	means this retail supplier's licence granted under section 10 of the Act.
Licensed Water Industry Infrastructure	means the water industry infrastructure by means of which the non-potable water, drinking water and/or sewerage services (as applicable) under this Licence are supplied.
Licensee	means Altogether Group Pty Ltd (ACN 136 272 298).
Licensee's Code of Conduct	has the meaning given in Schedule B, clause 7.1.
Minister	means the Minister responsible for Part 2 of the Act.

NSW Health	means the Water Unit of NSW Ministry of Health and any of the local health districts as defined by the NSW Ministry of Health.
Plan	means the retail supply management plan that the Licensee is required to prepare under the Regulation.
Regulation	means the <i>Water Industry Competition (General) Regulation 2021</i> (NSW).
Reporting Manual	means the document titled “Network Operator’s Reporting Manual and Retail Supplier’s Reporting Manual under <i>Water Industry Competition Act 2006</i> ”, which is prepared by IPART and is available on IPART’s website .
Shepherds Bay Network Operator's Licence	means network operator's licence no. 17_042 granted to Altogether Operations Pty Ltd (ACN 603 106 305) (as varied by the Minister from time to time).
Small Retail Customer	has the meaning given to that term in the Regulation.
Water Industry Infrastructure	means the water industry infrastructure specified in, as applicable: <ul style="list-style-type: none"> a) section 1, Table 1.2 b) section 2, Table 2.2, and c) section 3, Table 3.2.

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- ¹ WIC Act, section 10(2).
 - ² WIC Act, section 10(5).
 - ³ WIC Act, section 10(6).
 - ⁴ Listed as at that date.
 - ⁵ WIC Act, section 9(1)(a) and section 9(1)(b)(ii).
 - ⁶ WIC Act, section 9(1)(b)(i).
 - ⁷ WIC Act, section 9(1)(b)(iii) and WIC Regulation, section 17(1)(b).
 - ⁸ WIC Act, section 9(1)(b)(iii) and WIC Regulation, section 17(1)(a).
 - ⁹ WIC Act, section 9(1)(c).
 - ¹⁰ Viridis, Operational Audit report: Altogether Combined Audit, October 2022.
 - ¹¹ Monthly IPART/Altogether Group Meeting Agenda and Draft Minutes – 20 September 2022.
 - ¹² Altogether Cooranbong, *Cooranbong Scheme Risk Register*, version 9, 24 August 2021.
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 - ¹⁶ Altogether, *Sewage Management Plan*, version 10, 6 January 2022.
 - ¹⁷ Altogether, *Retail Supplier Management Plan*, version 8, 18 August 2021.
 - ¹⁸ Altogether, *Complaints and Dispute Resolution Policy*, version 6, 21 December 2021.
 - ¹⁹ Altogether, *Missed Payments Policy*, version 1, 7 January 2021.
 - ²⁰ Altogether, *Incident Management Plan*, version 10, 20 January 2021.
 - ²¹ Altogether Group Ownership Structure, as at 13 May 2022.
 - ²² Prepared by Arthur J. Gallagher & Co. (Aus) Limited, 26 July 2021.
 - ²³ Email to IPART from icare, 27 June 2022.
 - ²⁴ IPART, [Report to the Minister: Assessing Green Square Water Pty Ltd's and Flow Systems Pty Ltd's licence variation applications](#), July 2020.
 - ²⁵ WIC Regulation, section 7.
 - ²⁶ Kinesis for Flow System, North Cooranbong Development Water Balance Report, Version 1.1, 9 February 2016.
 - ²⁷ Altogether Cooranbong, Response to Request for Information, 16 September 2022.
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 - ²⁹ RPS, Extension of WICA Network Operator Licence 15_033 Cooranbong: Review of Environmental Factors, Version E, 25 September 2019.
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 - ³³ <https://www.climatechange.environment.nsw.gov.au/hunter>, accessed 26 October 2022.

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D – Confidential financial capacity assessment

Section (4)(a) of the WIC A Attachment ct states that a licence may not be granted unless the Minister is satisfied that the applicant has, and will continue to have, the capacity (including technical, financial and organisational capacity) to carry out the activities that the licence (if granted) would authorise.

Altogether Cooranbong does not have financial capacity as a stand-alone entity and relies on the financial support of its parent company, Altogether Group, for financial capacity. Altogether Group is the parent company of 9 WIC Act licensees, including Altogether Cooranbong.

Altogether Group and subsidiary companies are owned by a consortium of three superannuation, sovereign wealth and investment funds (the Shareholders),^a via an intermediary trust (SCIT) and trustee company (SCI). The corporate structure on which the Altogether Group and subsidiaries relied upon for our assessment in 2020, remains in place.

On balance, we consider the Altogether Group of companies including Altogether Group and Altogether Cooranbong, with the financial support of the Shareholders, continues to have financial capacity. We have reached this conclusion by considering that:

- A reply from Altogether Group to our formal request for information stating the corporate ownership structure, guarantees and agreements for Altogether Group and subsidiary companies remains in place.^b
- A Security holders Agreement requires SCIT and subsidiaries (i.e. the Altogether Group corporate group) to provide investors with monthly management accounts, half yearly consolidated accounts and audited annual consolidated financial statements indicating a high standard for monitoring and financial management.^c
- The forecast cash flows for the North Cooranbong scheme indicate the scheme is financially sustainable over the medium to long term.^d
- Under a Subscription Agreement between the Shareholders and SCI, SCI can call upon \$5 million from the Shareholders to support Altogether Group's day-to-day operations. This is in addition to funds already received from the Shareholders as part of the sale in 2020.^e

We consider, on balance, Altogether Cooranbong and Altogether Group have established they have and will continue to have financial capacity with Shareholder support, but not on a stand-alone basis (i.e. without investors' support). We do not have sufficient financial information to establish stand-alone financial capacity.

^a The investment funds are Guardians of New Zealand Superannuation, Commonwealth Superannuation Corporation, MGIF SCIT PV Trust.

^b Email from Altogether Group to IPART, 25 July 2022.

^c Security holders Agreement between Guardians of New Zealand Superannuation, Commonwealth Superannuation Corporation, MGIF SCIT PV Pty Ltd, SCI and SCIT, clauses 1.1, 2.2, 3.3, 10.1 to 10.2, 11.2 and schedule 2, page 50.

^d Email from Altogether Group to IPART, 25 July 2022.

^e Subscription Agreement between Guardians of New Zealand Superannuation, Commonwealth Superannuation Corporation, MGIF SCIT PV Pty Ltd, SCI and SCIT, clauses 10.1 to 10.2.