



Narara Ecovillage Co-operative Ltd
25 Research Road Narara NSW 2250
ABN 86 789 868 574

Appendix - 5.1.5

NEV Retail Supply Risk Register RevD

Document Control Information



Document:	Narara Ecovillage Water Retail Risk Assessment Register
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Risk Review Details

Date	Location	Attendance	Purpose	Outcomes
01-Dec-15	Aquacell Pty Ltd 1/10B Production Place Penrith NSW 2750	Justin Taylor (Aquacell) John Talbott (CEO, NEV) Geff Cameron (Director, NEV) Colin Fisher (CEO, Aquacell) David Parris (Contracts Manager, NEV) Warren Johnson (Technical Manager, Aquacell)	Original assessment.	Creation of first iteration of the retail supply risk register.
06-Feb-16	Narara Ecovillage 25 Research Road NARARA NSW 2250	John Talbott (CEO, NEV) Donna Carey (Director, NEV) Stu King (Chair, NEV) David Parris (Contracts Manager, NEV)	Review of original risk register.	More detail added to the control strategies.
22-Feb-16	AICD, Level 1, 20 Bond Street, Sydney	John Talbott (CEO, NEV) Annette Davison (Director and Principal, Risk Edge)	Review of risk register.	Clarity added to controls with original 'Control strategies' column split into 'Risk Treatments' and 'Oversight' in line with 5 Levels of Assurance philosophy.
23-Feb-16	Risk Edge Head Office, 1/7 Highfield Road, Lindfield	Annette Davison	Reformatting of structure.	Document Control' added, format changed including standardising font to Arial, residual risk scores changed to reflect uncertainty inherent in current risk treatments and oversight. 'Retail Risk Assessment' changed to 'RetailRiskRegister'. 'Lookuptables' sheet added. Formula added to risk score cells for automatic calculation of risk score and conditional formatting. Risk numbers added. 'Comments' column added for capturing relevant points, basis for risk scores and any uncertainty evident. Risk scores reviewed and adjusted as required. Colour added to worksheet tabs - all supporting sheets are black.
14-Mar-16	Risk Edge Head Office, 1/7 Highfield Road, Lindfield	Mark Fisher (Director, NEV) Geoff Cameron (Director, NEV) Annette Davison (Director and Principal, Risk Edge)	Risk review	Events, controls and scores reviewed. Events BO6; BO7 and BO8, reviewed and content added. Improvement Plan updated with one new action.

Retail Supply Risk Register

Activity	Risk #	Risk	Impact	Maximum Risk			Risk Treatments	Oversight
				L	C	Max. Risk Score		
Network Operations	NO1	Network Operator has infrastructure failure or interruption	NEV unable to supply customers with service	C	3	High	<p>Infrastructure Operating Plan. An asset management plan will be developed. Water Quality Management Plan (npw and pw). NEV is the sole operator with responsibility for the scheme. Future contract of O&M works. NEV Project Risk framework. Complaints Handling and Dispute Resolution Policy.</p>	<p>Aquacell will be contractually subject to the external WICA audits. Contractual commissioning period before commencement of operation. SCADA system monitoring.</p>
Network Operations	NO2	Quality of water supplied by the network operator is not fit for purpose	Supplied water (potable or non-potable) is unsuitable for customer use	C	4	Very High	<p>Infrastructure Operating Plan. An asset management plan will be developed. Water Quality Management Plan (npw and pw). NEV is the sole operator with responsibility for the scheme. Future contract of O&M works. NEV Project Risk framework. Contractual obligation with Aquacell to communicate water quality outages/exceedances. Complaints Handling and Dispute Resolution Policy.</p>	<p>Aquacell will be contractually subject to the external WICA audits. Contractual commissioning period before commencement of operation. SCADA system monitoring.</p>
Alternate Supplies	AS1	Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	NEV unable to supply customers with full services	C	3	High	<p>Buffer tanks for raw sewage have been designed to have good capacity for system outages (sized for 7 days' storage for Stage 1). Formal approach documented to tankering of sewage in event of outage. System sized to meet the external demand management assessment. Incident Management Plan (to be developed). WQMP. Retail Management Plan. Customer Service Charter. Backup power for managing power outages and communications.</p>	<p>Demand management assessment has been undertaken by Woodlots and Wetlands. Water quality monitoring in WQMP. SCADA system monitoring</p>

Business Operations	BO1	Business Interruption, e.g. fire, flood, natural disaster	NEV unable to operate as a retail supplier	A	5	High	Business interruption insurance policy in place. Initial Dam Safety Management System developed. Flood Study. Dam Safety Management Policy. Cloud (Dropbox) data storage. External NEV office available. Accounting is in Xero (Cloud-based).	External insurance advice provided by independent insurance broker External dam geotechnical assessment and management advice provided by Pells Consulting Dam Safety Inspection Report External advice provided by Woodlots and Wetlands (reservoir water quality)
Business Operations	BO2	Unforeseen event at NEV site or premises e.g. at the system level (noting that natural disasters are covered above)	NEV incurs unexpected or unsustainable expenses and can no longer operate as a retail supplier	A	4	Moderate	Risk management strategy in place to review potential risks and identify insurance to cover the possible outcomes.	Annual insurance reviews with broker (General Insurance Brokers of Australia P/L) to ensure ongoing adequacy of policies.
Business Operations	BO3	Financial Risk - NEV Cash Flow	NEV unable to operate as retail supplier due to cash flow shortfall	B	4	High	NEV is the operator as well as the customer - therefore there is an ability to negotiate with customers to raise levies. Rates have been set on an assessed basis (higher rates in first few years). NEV provides subsidy in first few years with break even planned in 5.1 years.	Internal five-year cashflow assessment (scheme is in profit after 5.1 years). NEV Board meetings to review financials supported by internal bookkeeper and accountant External financial review by CPA (Boyce Accountants)
Business Operations	BO4	Resource - insufficient financial and human resources committed within NEV	Delays to addressing service issues or billing of customers	C	3	High	Stage 1 commitments are only for 60 customers. Low resources required initially. Skillsets exist within NEV and can be deployed at short notice to satisfy short term resource deficiencies. NEV will develop a process to monitor and review KPIs of personnel responsible for delivering retail services.	NEV Board meetings to review financials supported by internal bookkeeper and accountant External financial review by CPA (Boyce Accountants)
Business Operations	BO5	Organisational - restructure, sale or transfer of utility business etc.	NEV have resources reassigned and are unable to complete responsibilities as a retail supplier	A	3	Low	Disposal of Asset Policy (requires member/business-co-owners consent for any organisational changes). Commitment to maintaining water services (quality) through draft Water Quality Policy.	NEV Board meetings to review financials supported by internal bookkeeper and accountant NEV Risk and Audit Committee oversight

Business Operations	BO6	Climate change or other cause reduces source/availability of raw water	Lack of availability of potable water/recycled water product for the community (reputational/financial impact)	A	4	Moderate	Use of external consultants for review of this event.	Climate studies have been conducted by Woodlots and Wetlands and Pells Consulting - suggest little risk from this event. NEV review of risk registers noting that this event will be reviewed periodically as part of that process.
Business Operations	BO7	Relationship with Gosford Water becomes unworkable	Loss of initial potable water source and no ability to negotiate an extended supply for Stage 2 (reputational/financial impact)	B	4	High	Sustainability Officer from Willoughby Council is one of the NEV members dealing with Gosford Water and finalising contractual arrangements. Good internal support for the project from other members of Gosford CC. Already connected as an existing water customer and therefore highly unlikely that Gosford would terminate supply.	Board review of proceedings with Gosford Water. Regular meetings with Gosford City Council with formal records as required.
Business Operations	BO8	Merger of Gosford Water and Wyong to form the Central Coast Water Corporation	Change management issues could result in inability to or delays in negotiation for access to water product (reputational/financial impact)	B	4	High	Agreement is being finalised before the amalgamation occurs. All existing contracts will still be relevant under the new corporation.	Board review of proceedings with Gosford Water. Regular meetings with Gosford City Council with formal records as required.
Customer Relations	CR1	Customer complaint or dispute - invoicing	Customer unhappy. NEV may not receive revenue for services	D	2	Moderate	Complaints Handling and Dispute Resolution Policy. Customer Charter. Supply Agreement. Current system involves Xero for billing. Customers are also signatories of the Community Management Statement (sets out terms of reference and behaviour expectations for the community)	NEV Board meetings to review financials supported by internal bookkeeper and accountant NEV Risk and Audit Committee oversight
Customer Relations	CR2	Customer complaint or dispute - quality of service	Customer unhappy and may raise issues publicly and affect NEV reputation	C	2	Moderate	Complaints Handling and Dispute Resolution Policy. Customer Charter. Supply Agreement. Customers are also signatories of the Community Management Statement (sets out terms of reference and behaviour expectations for the community)	NEV Risk and Audit Committee oversight

Improvement Plan Retail Supply

#	Origin	Improvement Action	Action Owner	Priority	Comments	Progress	Key Records
	<i>Record the origin of the action to ensure ease of tracking.</i>	<i>When adding new actions, add date and write clear action information in here - the action should be easy to understand in terms of what is required.</i>	<i>Record the person who has been assigned to deliver the action.</i>	<i>1 = 0-6 months 2 = 6-9 months 3 = Within a year</i>	<i>Record comments on here including key inputs for progress and any delay points.</i>	<i>Actions must be open or closed.</i>	<i>Record any key documents or pieces of information here that can be used to support the finding or the decisions taken. Ideally the location of the information should also be recorded e.g. document record or other reference.</i>
A1	NO1 Network Operator has infrastructure failure or interruption	22/2/2016: Develop the asset and equipment register.		1		Open	
A2	NO1 Network Operator has infrastructure failure or interruption BO2 Unforeseen event at NEV site or premises	22/2/2016: Ensure that a risk management procedure and policy are developed to formalise the 'risk management strategy'					
A3	NO1 Network Operator has infrastructure failure or interruption	22/2/2016: Consider setting a frequency for review meetings to discuss system operations and any required improvements e.g. monthly meetings with contractors, weekly meetings internally with NEV staff.					
A4	NO1 Network Operator has infrastructure failure or interruption	22/2/2016: Ensure that an audit schedule is set up for the system with risk-based frequency assigned.					
A5	NO1 Network Operator has infrastructure failure or interruption	22/2/2016: Develop an Incident Management Plan to cover off on infrastructure failure and any other failures which may cause failure of supply.					
A6	NO1 Network Operator has infrastructure failure or interruption	22/2/2016: Review customer charter to ensure that levels of service etc are clearly stated.					
A7	NO2 Quality of water supplied by the network operator is not fit for purpose	22/2/2016: Consider having City Water Technology review the adequacy of the CCPs for both recycled water and drinking water.					
A8	NO2 Quality of water supplied by the network operator is not fit for purpose	22/2/2016: Consider having a gap analysis of the WQMPs (by an Exemplar Global qualified auditor) before commencing operation.					
A9	AS1 Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	22/2/2016: Double check if sewage storage capacity is same for Stage 2.					
A10	AS1 Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	22/2/2016: Double check if tankering has been documented for removal of sewage in the event of an outage.					
A11	AS1 Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	22/2/2016: Consider how source controls (trade waste, residential inputs etc) will be addressed, especially if the scheme is re-zoned to allow different usages.					
A12	AS1 Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	22/2/2016: Ensure that an audit schedule is set up for the system with risk-based frequency assigned.					
A13	AS1 Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	22/2/2016: Review how demand will be managed/communicated in the event of an outage.					

A14	AS1 Alternate supply of services (sewerage, drinking water and recycled water) not available when needed or insufficient available to satisfy demand	22/2/2016: Develop Incident Management Plan - ensure integration (not duplication) with Business Continuity Plan (ISO 22301 Business Continuity Management).					
A15	BO1 Business Interruption, e.g. fire, flood, natural disaster	22/2/2016: Develop a Business Continuity Plan (guidance in ISO 22301 Business Continuity Management) to address this event.					
A16	BO1 Business Interruption, e.g. fire, flood, natural disaster	22/2/2016: Double check procedure for data management.					
A17	BO1 Business Interruption, e.g. fire, flood, natural disaster	23/2/2016: Make sure location of NEV external office is covered in the Business Continuity Plan.					
A18	BO4 Resource - insufficient financial and human resources committed within NEV	22/2/2016: Review suitability of software packages to facilitate billing purposes.					
A19	BO4 Resource - insufficient financial and human resources committed within NEV	22/2/2016: Develop a process to monitor and review KPIs of personnel responsible for delivering retail services.					
A20	BO5 Organisational - restructure, sale or transfer of utility business etc.	22/2/2016: Finalise draft Water Quality Policy.					
A21	CR1 Customer complaint or dispute - invoicing	22/2/2016: Check presence of Supply Agreement (contract between NEV and NEV customer).					
A22	CR1 Customer complaint or dispute - invoicing	22/2/2016: If Supply Agreement (contract between NEV and NEV customer) in existence, check contents of agreement.					
A23	CR2 Customer complaint or dispute - quality of service	22/2/2016: Consider use of EWON (Energy and Water Ombudsman NSW) as an external arbitrator for customer issues.					
A24	CR2 Customer complaint or dispute - quality of service	22/2/2016: Ensure that there is a 'customer' line item on the Board agenda at which point any set customer KPIs can be reviewed.					
A25	CR2 Customer complaint or dispute - quality of service	22/2/2016: Ensure that there is a 'water quality' line item on the Board agenda at which point recycled and drinking water critical control point exceedances/near exceedances/trends can be reviewed.					
A26	CR2 Customer complaint or dispute - quality of service	22/2/2016: Ensure that a system is in place for recording and responding to customer issues (AS/NZS 10002:2014 Guidelines for complaint management in organizations may provide some good direction).					
A27	BO6 Climate change or other cause reduces source/availability of raw water	14/3/16: Consider benchmarking climate change against industry standard practices to see how this event is dealt with on a wider level.					
A28							

Risk Matrix Lookup Tables

		Consequence				
		1	2	3	4	5
Likelihood	A	Low	Low	Low	Moderate	High
	B	Low	Low	Moderate	High	Very High
	C	Low	Moderate	High	Very High	Very High
	D	Low	Moderate	High	Very High	Very High
	E	Low	Moderate	High	Very High	Very High

Qualitative measures of likelihood

Level		Descriptor	Example of Description	Specifics
A	1	Rare	May occur only in exceptional circumstances	very rarely > annual
B	2	Unlikely	Could occur in unusual circumstances	chance of annual occurrence
C	3	Possible	Might occur or should be expected to occur under certain circumstances	chance of monthly occurrence
D	4	Likely	Will probably occur	chance of weekly occurrence
E	5	Almost Certain	Is expected to occur	chance of daily occurrence

Qualitative measures of consequence

Level	Descriptor	Example of Description		
		Health	Financial	Environment
1	Insignificant	Insignificant impact or not detectable		
2	Minor	Minor impact on contact population, first aid treatment	> \$10k Delay > 1 week	Minimal and short term harm to the environment
3	Moderate	Moderate impact on contact population, medical treatment required	> \$200k Delay > 1 month	Significant harm to the local environment for a short period
4	Major	Major impact on contact population, extensive injuries	> \$1m Delay > 6 months	Significant harm to the environment
5	Catastrophic	Potentially lethal on contact population, death	> \$5m Indefinite delay	Significant, widespread harm outside local area

Likelihood	Consequence
A	1
B	2
C	3
D	4
E	5

Risk

	1	2	3	4	5
A	1	2	3	4	5
B	2	4	6	8	10
C	3	6	9	12	15
D	4	8	12	16	20
E	5	10	15	20	25

	1	2	3	4	5					
1	1	Low	2	Low	3	Low	4	Moderate	5	High
2	2	Low	4	Low	6	Moderate	8	High	10	Very High
3	3	Low	6	Moderate	9	High	12	Very High	15	Very High
4	4	Low	8	Moderate	12	High	16	Very High	20	Very High
5	5	Low	10	Moderate	15	High	20	Very High	25	Very High

	1	2	3	4	5	
A	1	Low	Low	Low	Moderate	High
B	2	Low	Low	Moderate	High	Very High
C	3	Low	Moderate	High	Very High	Very High
D	4	Low	Moderate	High	Very High	Very High
E	5	Low	Moderate	High	Very High	Very High

Risk Matrix

		Consequence				
		1	2	3	4	5
Likelihood	1	Low	Low	Low	Moderate	High
	2	Low	Low	Moderate	High	Very High
	3	Low	Moderate	High	Very High	Very High
	4	Low	Moderate	High	Very High	Very High
	5	Low	Moderate	High	Very High	Very High

Qualitative measures of likelihood

Level	Descriptor	Example of Description	
1	Rare	May occur only in exceptional circumstances	very rarely > annual
2	Unlikely	Could occur in unusual circumstances	chance of annual occurrence
3	Possible	Might occur or should be expected to occur under certain circumstances	chance of monthly occurrence
4	Likely	Will probably occur	chance of weekly occurrence
5	Almost Certain	Is expected to occur	chance of daily occurrence

Qualitative measures of consequence

Level	Descriptor	Example of Description
1	Insignificant	Insignificant impact or not detectable
2	Minor	Health - Minor impact on contact population, first aid treatment Financial impact > \$10k Delay > 1 week Environment - Minimal and short term harm to the environment
3	Moderate	Health - Moderate impact on contact population, medical treatment required Financial impact > \$200k Delay > 1 month Environment - Significant harm to the local environment for a short period
4	Major	Health - Major impact on contact population, extensive injuries Financial impact > \$1m Delay > 6 months Environment - significant harm to the environment
5	Catastrophic	Health - Potentially lethal on on contact population, death Financial impact > \$5m Indefinite delay Environment - significant, widespread harm outside local area

Lists

Priority	Progress
1	Open
2	Closed
3	

Appendix 5.1.7.1

Draft Retail Supply Management Plan

Contents

1.	Context	2
2.	Purpose	2
3.	Supporting Documents	2
4.	Retail Supply Management Plan	3
4.1.	Background	3
4.2.	Events or Circumstances Which Could Adversely Affect Ability to Supply Services	3
4.3.	Probability of Events or Circumstances Which Could Adversely Affect Ability to Supply Services	4
4.4.	Unplanned Interruptions — Response.....	4
4.5.	Bursts, Leaks, Blockages and Spills	4
4.6.	Alternate Supply Measures	5
4.7.	Customer Complaints and Dispute Resolution	5
4.8.	Communication	6
4.9.	Review of Retail Management Plan.....	6

Document Name:	Retail Supply Management Plan	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 1 of 6

1. Context

Narara Ecovillage Co-operative Ltd (NEV) as the network and retail license holder under Water Industry Competition Act (WICA) will be responsible for the construction, operation and maintenance of all water infrastructure from source to customer connection within the Narara Ecovillage site.

This Retail Supply Management Plan is a part of NEV's management framework and relates to NEV's intention, conduct and practices when supplying customers as part of its Retail Supplier's Licence under the Water Industry Competition Act.

Services supplied under this Retail Supplier's Licence includes:

- a) Potable water supply
- b) Non-potable water supply
- c) Sewerage services

2. Purpose

This Retail Supply Management Plan relates to NEV's intention, conduct and practices when supplying customers as part of its Retail Supplier's Licence under the Water Industry Competition Act. Services supplied under this Retail Supplier's Licence will include:

- Potable water supply
- Non-potable water supply
- Sewerage services

In addition, this Retail Supply Management Plan considers the events and circumstances that could adversely affect NEV's ability to supply potable water, non-potable water, or sewerage services to its customers. It also considers the probability of occurrence of any such event. Included are the measures taken to minimise the effect of the occurrence consideration given to alternate supplies.

This plan has been developed to:

- a) To ensure NEV's customers, our members, receive a responsive, caring and professional service which meets their water service needs at a reasonable cost
- b) To consider what events might affect the delivery of these services and ensure such risks are appropriately managed
- c) To ensure NEV has appropriate policies and procedures to manage the above and also to ensure licence compliance

3. Supporting Documents

NEV has a set of management plans that describe the water industry infrastructure it has constructed, operates and maintains. These plans include, but are not limited to:

- a) Infrastructure Operating Plan
- b) Recycled Water Quality Management Plan
- c) Drinking Water Quality Management Plan
- d) Environmental Management Plan
- e) Network Management Plans – sewerage, irrigation, non-potable water, potable water
- f) Operations and Maintenance Manual
- g) Sampling and monitoring programs
- h) Operator Training – Retail, Dam and Network

In addition NEV has developed the following documents to assist with managing its retail operations:

- a) NEV Water Retail Supply Risk Assessment
- b) NEV Customer Complaint and Dispute Resolution procedure

Document Name:	Retail Supply Management Plan	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 2 of 6

4. Retail Supply Management Plan

4.1. Background

For each scheme to which this Retail Supply Management Plan applies, NEV has a series of management plans that describe the water industry infrastructure it has constructed, operates and maintains. For any scheme, these plans may include, but are not limited to:

- Infrastructure Operating Plan
- Recycled Water Quality Management Plan
- Drinking Water Quality Management Plan
- Environmental Management Plan
- Network Management Plans – sewerage, irrigation, non-potable water, potable water
- Operations and Maintenance Manual
- Sampling and monitoring programs
- Training

A site specific version of each relevant plan is developed, however in some cases, a generic plan which is applicable to all sites may be used.

Collectively, these plans are used to:

- describe the water infrastructure and its intended function
- the scope of operation including quantity and quality parameters where appropriate
- identify risks which may adversely affect the operation of any of the infrastructure
- implement control measures which mitigate risk and minimise the possibility of service interruption to the customer
- plans and strategies to ensure ongoing operation of the infrastructure
- plans and strategies to supply customers with alternate services where their supply is interrupted.

Process and site specific risks that would adversely affect the ability of any scheme to supply the customers are considered in detailed risk assessments applicable to the site. These risk assessments are not reproduced in this document.

4.2. Events or Circumstances Which Could Adversely Affect Ability to Supply Services

Prior to constructing any water infrastructure subject to a Water Industry Competition Act (WICA), NEV undertakes detailed risk assessments. These risk assessments are submitted and reviewed by IPART as part of the WICA application process. Construction does not commence on any treatment plant or infrastructure until the application has been signed off by the appropriate Minister.

The risk assessments produced are confidential and are not reproduced in this document. Broadly, the risks to infrastructure for each type of supply can be categorised as:

Potable Water

- Lack of source water
- Source water is of a quality that cannot be treated by the plant
- Mechanical or electrical failure in the treatment train(s)
- Process failure in the treatment train(s)
- Failure of distribution infrastructure including pumps and pipe network

Non Potable Water

- Lack of source water
- Source water is of a quality that cannot be treated by the plant
- Mechanical or electrical failure in the treatment train(s)
- Process failure in the treatment train(s)
- Failure of distribution infrastructure including pumps and pipe network

Document Name:	Retail Supply Management Plan	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 3 of 6

Sewage Services

- Failure in sewerage network including pumps, wet wells or pipework
- Mechanical or electrical failure of treatment plant(s)
- Process failure at one or more treatment plant(s)

For each scheme, the risks identified and the mitigation strategies and activities are documented in the site specific documentation detailed in Section 2.

The supply of services could be interrupted if NEV experiences adverse business or financial conditions. NEV implements a number of strategies to mitigate this risk. These include a number of business strategies and insurance policies which seek to minimise the risk of the company experiencing financial hardship.

4.3. Probability of Events or Circumstances Which Could Adversely Affect Ability to Supply Services

The consequences and likelihood of events mentioned in Section 3 occurring are documented in the risk assessments. In general, the risk assessments quantify the unmitigated risk, and the mitigated risk once the identified control measures have been implemented. The risk assessments for each scheme are supplied for review by IPART as part of the application process.

4.4. Unplanned Interruptions — Response

NEV will comply with the following standards:

- The number of customers who will receive an unplanned water and/or waste water service interruption will be kept to a practical minimum;
- On average, NEV will attend urgent water and waste water failures within 180 minutes;
- NEV or its agent will restore unplanned water and waste water service supply within 24 hours where practical and parts are available;
- NEV or its agent will keep a stock of most common consumable parts to assist with the speedy resolution of service failure.

NEV will:

- Minimise the impact of unplanned interruptions to services (including restoration as soon as possible, and the provision of information); and
- Provide customers with access to drinking water in the event of major or long- term unplanned interruptions to water services.

4.5. Bursts, Leaks, Blockages and Spills

In the event of a burst, leak or blockage in its system, NEV or its agent will;-

Promptly attend the site upon notification; Take action to rectify the situation, taking into account the potential or actual impact on:

- Customers;
- Others affected by the failure;
- Property; and
- The environment.

Provide information about any unplanned interruption to a service through a notice affixed to its external customer notice board, which advises customers of the estimated duration of any interruption.

Ensure that, in the event of a waste water spill on a customer's property damage and inconvenience to customers and others affected is minimised; and

Ensure that a waste water spill is promptly contained, cleaned up and the affected area disinfected.

Document Name:	Retail Supply Management Plan	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 4 of 6

4.6. Alternate Supply Measures

Alternate supply arrangements for each service are documented as part of the application process and viable supplies must be identified before construction is authorised by the Minister to commence. Each service will have a different strategy depending on its size and location. Broadly, alternate supply arrangements fall into one of the following categories.

- Potable water back up from multi-day buffer tank supply
- Potable water back by carting potable water in by tanker from an alternate source
- Non-potable water back up by supply of potable water from mains supply
- Non-potable water back up by carting potable water in by tanker from an alternate source
- Removal of sewage from site by tinkering to municipal treatment plant

Alternate supply measures for each service are documented in the management plans relevant to that service.

4.7. Customer Complaints and Dispute Resolution

Monitoring of customer satisfaction will be undertaken for the NEV scheme by monitoring and acting on customer feedback and complaints through the NEV Water Utility Office

All customer complaints will be investigated. A preliminary overview of the process for monitoring and investigation of customer complaints is outlined below:

1. NEV Water Utility Office staff receives a call from a NEV customer or member of the public;
2. NEV Water Utility Office staff records a log of the call including complaint number, customer contact details, time of call, time(s) of incident and description of the query or concern into the Customer Service Management Database;
3. NEV Water Utility Office staff contacts the NEV site operator and provides appropriate information regarding the complaint for action. This information may also be emailed for a written record;
4. The NEV site operator investigates the complaint, if required contacts the complainant and takes appropriate action to rectify any issues.
5. If significant issues are identified the NEV operator will escalate the complaint to the NEV Water Operations Supervisor.
6. The NEV site operator contacts the NEV office to close out the complaint advising the issues, what action was taken, what time if any future rectification works are required;
7. NEV office operator closes out the complaint in the Customer Service Management Database by entering all information provided by NEV staff and advising the customer appropriately;
8. Customer service statistics, response times, KPIs etc. can be extracted from the data stored in the Customer Service Management Database at the NEV office. Regular reports will be provided to NEV Water Utility management.

NEV staff will receive ongoing training to ensure this customer complaint process is appropriately implemented. NEV Scheme staff will be trained to log any customer complaints or feedback that they receive via other means (e.g. in person) to the NEV office to ensure the details are recorded and can be tracked and monitored.

NEV has a documented procedure for debt recovery and dispute resolution. NEV will follow the procedures outlined in this document to resolve any dispute and recover any debt owed.

Document Name:	Retail Supply Management Plan	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 5 of 6

4.8. Communication

Community involvement in the NEV drinking water scheme will be encouraged. The following mechanisms will be available for community communication and to promote awareness of drinking water quality issues:

- Direct communication of water quality incidents and alerts
- NEV website updated with recent information including water quality monitoring results
- Customer supply agreements with all residential customers of the NEV Scheme
- Commercial and trade waste agreements with any commercial customers of the NEV Scheme
- Customer information packs distributed to all dwellings in the scheme
- Ongoing customer awareness and education
- Customer service systems for managing customer complaints and reporting of failures
- Smart water meters for customer feedback on water usage and leaks
- Direct communication with the NEV Water Utility staff (because the scheme is small with onsite assets and a local operator, it is likely that residents will be able to directly communicate with NEV Water Utility staff)
- Community consultation for all major system changes once the scheme becomes operational

4.9. Review of Retail Management Plan

NEV will review this Management Plan annually or sooner, as part of its annual compliance review.

Document Name:	Retail Supply Management Plan	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 6 of 6

Appendix 5.1.7.2

Complaints Handling and Dispute Resolution Policy

Date Adopted:

Details of XXXX Meeting:

Approved by:

Seconded by:

Contents

Document Creation and Review.....	2
Document Control.....	2
1. Context.....	2
2. Aim.....	2
3. Abbreviations.....	2
4. Purpose of this Policy.....	3
6.1. Introduction.....	3
6.2. Terminology.....	3
5. ASIC requirements.....	3
7.1. ASIC’s requirements are as follows.....	3
6. Key Principles for Complaints Handling and Dispute Resolution.....	4
7. Procedures.....	4
9.1 If a Customer submits a complaint to NEV.....	4
9.2 Resolution of Complaints.....	5
9.3 Resolution of Written Complaints.....	5
9.4 Resolution of Oral Complaints.....	5
9.5 If customer asks for information about complaints handling procedures.....	5
9.6 If customer asks for assistance in formulating or lodging complaint.....	5
9.7 Where complaint not resolved to customer’s satisfaction.....	5
9.8 Telling Customers about this Policy.....	6
8. General.....	6
10.1 Communication within NEV.....	6
10.2 Annual Review of this Policy.....	6

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 1 of 9

10.3	The Complaints and Disputes Register	6
10.4	Review against Documented Performance Standards	6
9.	Attachment A: Complaint Report.....	8
10.	Attachment B: Complaints Handling Procedures	9

Document Creation and Review

Revision No	Author	Reviewed By	Approved By	Date
1	Donna Carey			1 December 2015

Document Control

Revision No	Status	Issued To		Date
		Name	Organisation	

1. Context

Narara Ecovillage Co-operative Limited (NEV) is creating a socially, environmentally and economically sustainable community.

NEV will be responsible for the design, construction, commission, operation and maintenance of all potable, non-potable and sewerage infrastructure distribution networks from source to the customer connection points in accordance with the Water Services Association of Australia (WSAA) guidelines.

NEV plans to produce and treat water on site for household use, irrigation and possibly for small commercial applications. This aspect is critical to the success of the village and the quality of life of NEV residents and visitors. NEV aims to be self-sufficient in providing water and be a model for sustainable water management for a community.

2. Aim

The purpose of this Policy is to set out how NEV Water deals with complaints and resolves disputes from customers. While it is hoped that there will be few complaints received from customers, it is recognised that complaints may arise and this Policy will assist workers with the process involved for handling complaints and resolving disputes.

When necessary or appropriate, NEV Water may make use of an approved ombudsman scheme such as EWOS (Energy & Water Ombudsman NSW).

3. Abbreviations

EWOS	Energy & Water Ombudsman NSW
NEV	Narara Ecovillage Co-operative Limited
WSAA	Water Services Association of Australia

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 2 of 9

4. Purpose of this Policy

4.1. Introduction

- NEV Water is committed to dealing with complaints and resolving disputes efficiently and fairly. The NEV Board expressly endorses this commitment
- Handling complaints well gives NEV Water an opportunity to better understand its customers, improve service and minimise disputes
- Workers are required to follow this Policy
- If you have any queries about this Policy, you should contact NEV's **Customer Relations Officer**, (i.e. the **Company Secretary**) by phone on 1300 NARARA

4.2. Terminology

- **Narara Ecovillage** also means NEV for the purposes of this policy
- **Board** means the board of directors of NEV
- **Customer** means an NEV Water customer
- **Complaint** means any expression of dissatisfaction with a product or service offered or provided by NEV Water ¹
- A complaint can be made orally or in writing
- **Dispute** means a pursued unsatisfied complaint ². In other words, it is a matter that has been dealt with as a complaint under this Policy but where the complainant is still not satisfied with the outcome
- **Relevant Workers** means employees, consultants and contractors who may receive complaints from customers

5. ASIC requirements

5.1. ASIC's requirements are as follows ³

- a. The complaints/disputes handling procedures must satisfy the Essential Elements of Effective Complaints Handling set out in section 2 of AS 4269-1995 (these Essential Elements are set out in paragraph 6.1 of these Procedures).
- b. The procedures must appropriately document the internal complaints handling and dispute resolution procedures.

This includes setting out in writing the procedures and policies for:

- receiving complaints
- investigating complaints
- responding to complaints within appropriate time limits
- referring unresolved complaints to an external dispute resolution scheme
- recording information about complaints
- identifying and recording systemic issues
- the types of remedies available for resolving complaints, and
- internal structures and reporting requirements for complaints handling

A copy of the procedures must be available to all Relevant Workers.

¹ AS 4269-1995, para 1.4.2

² AS 4269-1995, para 1.4.4

³ RG 165.10

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 3 of 9

A simple and easy-to-use guide to the procedures should also be made available to customers either on request or when they want to make a complaint.

- c. The procedures must include a system for informing complainants about the availability and accessibility of the relevant external dispute resolution scheme.

This means that this Policy must provide that if a complaint has been through the internal Complaints Handling Process but remains unresolved, or is not resolved within the appropriate time limits, the relevant complaints handling workers:

- must inform the complainant that they have a right to pursue their complaint with an external dispute resolution scheme, and
- provide details about how to access the relevant external dispute resolution scheme

6. Key Principles for Complaints Handling and Dispute Resolution ⁴

The Key Principles which underpin this Policy are as follows:

- a. NEV is committed to the efficient and fair resolution of complaints (noting that in this context, “fairness” means fairness to both the complainant and the person complained about)
- b. NEV has allocated adequate resources for handling complaints
- c. NEV tells *Relevant Workers* and *Customers* about its complaints handling policy
- d. NEV makes this complaints handling mechanism available to all of its customers
- e. If appropriate and a complainant requests, NEV will provide assistance to the complainant in the formulation and lodgement of complaints
- f. NEV aims to deal with complaints quickly and courteously
- g. Subject to statutory requirements, complaints handling under this Policy is at no charge to the complainant
- h. The **Customer Relations Officer** (where appropriate in conjunction with the **General Counsel**) has the capacity to determine and implement remedies to complaints/disputes
- i. Data is collected and recorded about complaints, and their outcomes
- j. Complaints are classified and analysed so that systemic or recurring problems are identified and rectified
- k. There is appropriate reporting on the operation of this Policy against documented performance standards
- l. This Policy is reviewed at least annually to ensure that it is delivering effective outcomes

This Policy embraces these Key Principles.

7. Procedures

7.1. If a Customer submits a complaint to NEV

NEV:

- a. must, if the complaint is oral, either resolve it “on the spot” to the customer’s satisfaction, or if that is not done, request the *Customer* to submit a written complaint (however, there is no requirement that the complaint be in writing before it can be dealt with according to these procedures), and refer the complaint to the **Customer Relations Officer**;
- b. must, if the complaint is in writing, acknowledge in writing receipt of the complaint as soon as practicable and in any event within 14 days from receipt, and enclose a copy of this Policy for the customer’s information;

⁴ These “Key Principles” address the “Essential Elements of Effective Complaints Handling” in Section 2 of AS 4269-1995

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 4 of 9

- c. must ensure that the complaint receives proper consideration resulting in a determination by the **Customer Relations Officer** as the person designated by NEV as appropriate to handle complaints;
- d. must act in good faith in dealing with and resolving the complaint;
- e. must investigate the complaint including by:
 - i. seeking all relevant information from the complainant;
 - ii. obtaining all relevant information from NEV workers,
- f. may in its discretion give any appropriate remedy to the complainant, including any of the following:
 - i. information and explanation regarding the circumstances giving rise to the complaint;
 - ii. an apology; or
 - iii. compensation for loss incurred by the complainant,
- g. must communicate to the complainant in relation to the complaint as soon as practicable and in any event not more than 45 days after receipt by NEV of the complaint:
 - i. the determination in relation to the complaint;
 - ii. the remedies (if any) available to the *Customer*; and
 - iii. information regarding any further avenue for complaint.

7.2. Resolution of Complaints

All oral complaints not resolved “on the spot” and all written complaints must be referred to the **Customer Relations Officer** on receipt. The **Customer Relations Officer** must ensure the steps listed in 6.1(b)-(g) are carried out. In doing this, the **Customer Relations Officer** must take into account and act consistently with the Key Principles set out in Section 8 of this Policy. The **Customer Relations Officer** must liaise as appropriate with the **General Counsel** when dealing with and resolving complaints.

7.3. Resolution of Written Complaints

Where a customer has been notified in writing of a decision about a complaint, and no response has been received from the *Customer*, the complaint can be treated as “*resolved to the satisfaction of the customer*”.

7.4. Resolution of Oral Complaints

These can be treated as “*resolved to the satisfaction of the customer*” where:

- a. the complaint has been resolved to the customer’s satisfaction “*on the spot*” or
- b. the customer has been notified of a decision about a complaint, and no response has been received from the customer, the complaint can be treated as “*resolved to the satisfaction of the customer*”

7.5. If customer asks for information about complaints handling procedures

If a *Customer* asks for information about NEV’s complaints handling methods, workers must refer that request to the **Customer Relations Officer** as soon as possible. The **Customer Relations Officer** must ensure the customer is provided with a copy of this Policy within 7 business days of the request.

7.6. If customer asks for assistance in formulating or lodging complaint

If a *Customer* asks for assistance in the formulation and lodgement of his/her complaint, workers must refer that request to the **Customer Relations Officer** as soon as possible. The **Customer Relations Officer** must ensure reasonable assistance is provided to the customer.

7.7. Where complaint not resolved to customer’s satisfaction

For each complaint that cannot be resolved to the customer’s satisfaction within 45 days, the **Customer Relations Officer** must inform the complainant in writing that the complainant may have a right to pursue

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 5 of 9

their complaint with Energy & Water Ombudsman Service NSW (EWOS) and provide details about how to access EWOS, or the designated arbitrator to be determined between NEV and IPART.

7.8. Telling Customers about this Policy

NEV must tell *Customers* about this Policy in each service contract, and make it available on their website.

8. General

8.1. Communication within NEV

All *Relevant Workers* must be made aware of this Policy. It is the responsibility of the **Customer Relations Officer** to ensure this occurs.

Periodically (at least annually), the **Customer Relations Officer** must remind all *Relevant Workers* about this Policy.

8.2. Annual Review of this Policy

The **Customer Relations Officer** is responsible for ensuring this Policy is adhered to.

Periodically (at least annually), the **Customer Relations Officer** must review this Policy and report the outcome of this review to the CEO.

When reviewing this Policy, consideration must be given to whether the Policy:

- continues to comply with all applicable legislative requirements; and
- efficiently delivers effective outcomes.

8.3. The Complaints and Disputes Register

The **Customer Relations Officer** must ensure that a Complaints and Disputes Register is established, maintained and kept up to date. The Register is comprised of a copy of each Complaint Report (refer to Attachment A).

At a minimum, the Register must include the following information about every complaint and/or dispute that is received:

- Date complaint made/dispute notified
- Nature of complaint/issue
- Date resolved
- How resolved
- Was dispute referred to Ombudsman or arbitrator
- Does complaint/dispute indicate a recurring or systemic issue
- If yes, action taken to ensure issue does not recur/that systemic issue addressed

The **Customer Relations Officer** must periodically review the Register to check, amongst other things, that:

- complaints are being handled appropriately, including in accordance with this Policy, and within the required timeframes
- systemic or recurring complaints are being identified, and that the cause of those complaints is being identified and remedied

The Complaints and Disputes Register must be tabled at least quarterly at the NEV Water Utility group meetings.

8.4. Review against Documented Performance Standards

The **Customer Relations Officer** must establish documented performance standards against which adherence to this Policy can be tested. Those standards must be based on the requirements of this Policy. The **Customer Relations Officer** must review the adequacy and appropriateness of those standards, and amend them as necessary.

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 6 of 9

Periodically (at least annually), the **Customer Relations Officer** must review the operation of the Policy against the documented performance standards and report the outcome of this review to the CEO.

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 7 of 9

9. Attachment A: Complaint Report

1.	<i>Date of this Report</i>	
2.	<i>Date complaint made / dispute notified</i>	
3.	<i>Date resolved</i>	
4.	<i>How resolved</i>	
5.	<i>Was complaint / dispute referred to arbitration or the Ombudsman Service</i>	
6.	<i>Does complaint / dispute indicate a recurring or systemic issue</i>	
7.	<i>If yes, what action was taken to ensure the issue does not recur / that systemic issue has been addressed</i>	
8.	<i>Date by which remedial action must be completed</i>	
9.	<i>Date remedial action completed</i>	
10.	<i>Who is responsible for ensuring this action is carried out</i>	
11.	<i>Date by which this action must be completed</i>	
12.	<i>Date action completed</i>	
13.	<i>Is complaint / dispute significant?</i>	
14.	<i>If yes – date notified to NEV Board</i>	
15.	<i>If yes – date notified to Network Operations Group Meeting</i>	

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 8 of 9

10. Attachment B: Complaints Handling Procedures

Documented Performance Standards

No.	Action required	Timeframe
1.	Send copy of NEV's Complaints Handling Policy to any Customer who asks for information about its complaints or disputes handling methods	Within 7 business days
2.	Oral complaints not resolved "on the spot" and written complaints to be referred to Customer Relations Officer	Immediately
3.	Where customer requests assistance in formulation/lodgement of complaint – refer matter to Customer Relations Officer	As soon as possible
4.	Customer Relations Officer to write to complainant acknowledging receipt of complaint, and forwarding copy of NEV's Complaints Handling Policy	Within 14 days of receiving complaint
5.	Customer Relations Officer to advise complainant in writing of outcome and (if complaint not resolved to complainant's satisfaction) advise complainant in writing of availability of external dispute resolution mechanism, Ombudsman Service (or designated equivalent); and how Ombudsman Service may be accessed.	Within 45 days of receiving complaint
6.	Complaints and Disputes Register – Customer Relations Officer to: (a) record complaint on Register; and (b) keep Register updated about the complaint	(a) Within 7 days of receipt (b) Within 45 days of receipt

Document Name:	Complaints Handling and Dispute Resolution	Revision Number & Date:	1 – 01/12/2015	Narara Ecovillage Co-operative Ltd
Date of Issue:	01/12/2015	Controlled Document:	Yes	Page 9 of 9