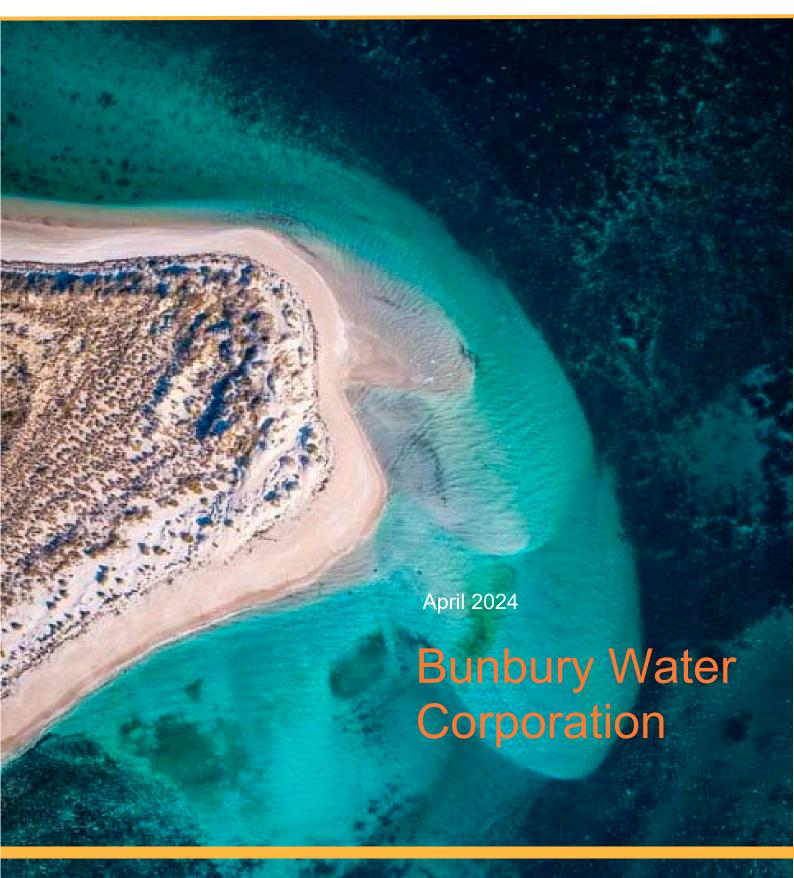
William Buck



2023 Operational Audit Report to the Economic Regulation Authority of Western Australia



CONTENTS

| 1. | Independent Auditor's Report | 1 |
|----|---|-----------|
| | 1.1 Introduction | 1 |
| | 1.2 Bunbury Water Corporation's Responsibility | 1 |
| | 1.3 Our Responsibility | 1 |
| | 1.4 Limitation of Use | |
| | 1.5 Inherent Limitations | 2 |
| | 1.6 Independence | 2 |
| | 1.7 Conclusion | |
| 2. | Executive Summary | 4 |
| | 2.1 Context | |
| | 2.2 Objectives | 4 |
| | 2.3 Scope | 4 |
| | 2.4 Approach | 5 |
| | 2.5 Site Visits | 6 |
| | 2.6 Personnel & Documentation | 6 |
| | 2.7 Compliance Reports & Registers | 7 |
| | 2.8 Work Schedule | 7 |
| | 2.9 Audit Team | 8 |
| | 2.10 Assessment of the Control Environment | 8 |
| | 2.11 Assessment of Compliance | 9 |
| | 2.12 Assessment of Aqwest's Response to Previous Audit Recommen | dations10 |
| | 2.13 Summary of Current Audit Findings and Recommendations | 26 |
| 3. | Performance Summary | 35 |
| 4. | Detailed Findings | 101 |



1. Independent Auditor's Report

1.1 Introduction

William Buck was engaged by the Economic Regulation Authority (ERA) to conduct a reasonable assurance engagement for the Operational Audit of the Bunbury Water Corporation's (trading as Aqwest) Water Services Licence conditions specified under the *Water Services Licence 2 – Version 10* dated 1 May 2020, and *Water Services Licence 2 – Version 11* dated 19 October 2021.

The assurance engagement was performed in accordance with the specific requirements of the Licence and the March 2019 issue of the *Audit and Review Guidelines: Water Licences* (Audit Guidelines).

The scope of work relates to assessing the Bunbury Water Corporation's (Aqwest) systems, processes and controls that ensure compliance with the regulatory obligations, standards, outputs, and outcomes required by the *Water Services Licence 2*.

1.2 Bunbury Water Corporation's Responsibility

Aqwest is responsible for:

- Complying with the Licence conditions;
- Establishing and maintaining appropriate governance structures and effective system of controls designed to achieve compliance with the Licence requirements;
- Continuous evaluation and monitoring of the effectiveness of these control procedures; and
- Implementing corrective actions for instances of non-compliance.

1.3 Our Responsibility

Our responsibility is to express a conclusion on the adequacy and effectiveness of Aqwest's systems, processes, and reporting regimes that ensure compliance with the obligations, standards, outputs and outcomes prescribed in the Licence.

The reasonable assurance engagement has been conducted in accordance with the Australian Standard on Assurance Engagement 3000 Assurance Engagements Other than Audits or Review of Historical Financial Information and the Australian Standard on Assurance Engagements 3100 Compliance Engagements issued by the Australian Auditing and Assurance Standards Board and in line with the requirements outlined in the Audit Guidelines, in order to state whether, in our opinion, based on the procedures performed, Aqwest has complied, in all material respects, with its Licence conditions as outlined in the approved Audit Plan for the audit period 1 October 2020 to 30 September 2023.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.



Our procedures consisted primarily of:

- Utilising the Audit Guidelines as a guide for development of the risk assessment and Audit Plan;
- Developing audit procedures for each obligation included in the Audit Plan for approval by the ERA;
- Reviewing of documents and walkthrough of processes and controls to assess the overall compliance and effectiveness in accordance with Licence obligations;
- Interviewing with, and obtaining representations from, relevant Aqwest's staff to gain an understanding of process controls;
- Sample testing of transactions and documents for each relevant obligation wherever applicable in accordance with the approved Audit Plan;
- Validating the findings with Aqwest's management stakeholders to confirm the observations.

There was minor deviation from the audit plan where a site visit was originally planned to be undertaken from the week commencing 9 October 2023 but was not conducted.

1.4 Limitation of Use

This audit report has been prepared for the ERA in accordance with the terms of our appointment and is not intended to be and should not be used by any other person or entity. We accept no duty, responsibility, or liability to any party, other than the ERA, in connection with the report or this engagement.

1.5 Inherent Limitations

Our engagement will provide reasonable assurance as defined in ASAE 3100. Reasonable assurance means a high but not absolute level of assurance. Absolute assurance is very rarely attainable as a result of factors such as the:

- Use of selective testing, and testing as at a point in time;
- Inherent limitations of internal controls;
- Fact that much of the evidence available to us is persuasive rather than conclusive; and
- Use of judgement in gathering and evaluating evidence and forming conclusions based on that evidence.

Due to the inherent limitations of any compliance procedure, it is possible that fraud, error or non—compliance may occur and not be detected. A reasonable assurance engagement is not designed to detect all instances of non—compliance, as the engagement is not performed continuously throughout the period and the procedures performed in respect of compliance are undertaken on a test basis. The conclusion expressed in this report has been formed on the above basis. Any projection of the evaluation of the level of compliance to future periods is subject to the risk that the systems may become inadequate because of changes in conditions, or that the degree of compliance with management procedures may deteriorate.

1.6 Independence

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.



1.7 Conclusion

1.7.1 Modified Opinion

In our opinion, based on the procedures performed and except for the effect of the issues set out in **Section 2.13** of this report, Aqwest has, in all material respects, complied with the conditions of its Licence for the period 1 October 2020 to 30 September 2023.

I confirm that the audit report is an accurate presentation of the findings.



William Buck Audit (WA) Pty Ltd ABN 67 125 012 124



Conley Manifis

Director

Dated this 24th day of April 2024





2. Executive Summary

2.1 Context

William Buck was engaged by the ERA to undertake the Operational Audit of Aqwest in accordance with the requirements set out in Section 25 of the Water Services Act 2012 (WA).

Pursuant to Section 25 of the Water Services Act 2012, Aqwest is required to, not less than once every 24 months (or such later date approved by the ERA), provide the ERA with an operational audit conducted by an independent expert acceptable to the ERA. The operational audit is a non-financial compliance audit of the effectiveness of measures taken by Aqwest to maintain the quality and performance standards referred to in its Water Services Licence.

William Buck conducted the operational audit as a reasonable assurance engagement and in accordance with the specific requirements of the Licence and the March 2019 issue of the Audit and Review Guidelines: Water Licences issued by the ERA (Audit Guidelines).

Aqwest provides water services under the provisions of a Water Service License (WL) issued by the Economic Regulation Authority (ERA). William Buck audited the conditions specified under *Water Services Licence 2 – Version 10* dated 1 May 2020, and *Water Services Licence 2 – Version 11* dated 19 October 2021. No substantial changes took place in the business of Aqwest since the previous audit.

The scope period was from 1 October 2020 to 30 September 2023.

2.2 Objectives

The objective of the Operational Audit is to assess the effectiveness of measures taken by Aqwest to meet the conditions of its licence ("licence obligations"). Specifically, for each licencing requirement, the audit considers the following:

- process compliance the effectiveness of the systems and procedures in place, including the adequacy of internal controls;
- outcome compliance the actual performance against standards prescribed in the licence throughout the audit period;
- output compliance the existence of the output from systems and procedures prescribed in the licence;
- integrity of reporting the completeness and accuracy of the compliance and performance reports
 provided to the ERA; and
- compliance with any individual licence conditions the actual performance against the requirements imposed on the specific licensee by the ERA or specific matters raised by the ERA.

2.3 Scope

The scope of the Operational Audit is from **1 October 2020 to 30 September 2023**. Over this period, there have been **two** reiterations of the licence:

- Water Licence 2 version 10 dated 1 May 2020; and
- Water Licence 2 version 11 dated 19 October 2021; all of which are subject to the Operational Audit.

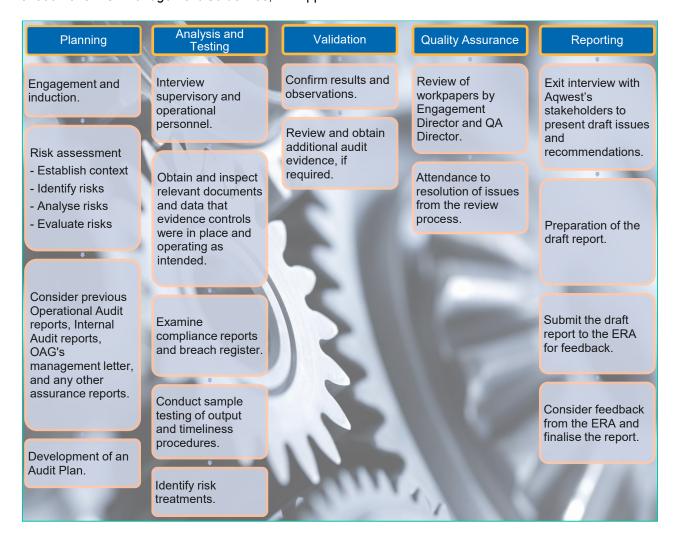


2.4 Approach

William Buck's risk-based approach for the operational audit was based on the requirements set out in the *Audit Guidelines*.

The approved Audit Plan was developed using the Likelihood and Consequence ratings tables from Appendix 3 of the Audit Guidelines. The preliminary adequacy ratings for existing controls were primarily conducted through discussions and representations by Aqwest's management stakeholders.

Our approach to the Operational Audit was designed to provide a reasonable level of assurance regarding Aqwest's compliance with the conditions of its licences. Based on the risk assessment standard, AS ISO 31000:2018 Risk Management Guidelines, our approach is summarised below:





In auditing the Licence conditions, we aimed to identify the risks that may affect compliance with these conditions by considering such things as where, when, why and how events could prevent, degrade, or delay compliance with the Licence obligations.

As part of our audit methodology, sampling is used because it is an efficient and effective way to reach an audit conclusion. Using the principles set out in *Auditing Standard ASA 530 Audit Sampling*, we used audit sampling to obtain and evaluate audit evidence about the level of compliance with the Licence obligations, to form a conclusion on the effectiveness of processes used to ensure compliance with the standards, outputs and outcomes required by the Licence.

An appropriate audit process requires that information should be sufficient, reliable, relevant, and useful to support the engagement's objectives and scope. In line with ASAE 3000 and ASA 500 Audit Evidence, sufficiency implies that the auditor has collected enough data to be persuaded about conclusions reached. Therefore, a sample of the evidence, rather than all the evidence, may have been collected where it was adequate in the auditor's judgment.

Materiality of instances of non-compliance has been considered in terms of if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken based on Agwest's compliance with the compliance requirements.

2.5 Site Visits

No site visits were performed as part of this audit.

2.6 Personnel & Documentation

Set out in <u>Appendix 1</u>, is a list of the Aqwest's personnel interviewed during the Operational Audit. The documents reviewed for each obligation have been identified in the detailed narrative for the obligations. Below is a categorised list of documents read during the Operational Audit:

- Aqwest application forms
- Aqwest agreements
- Aqwest website & intranet
- Aqwest terms and conditions
- Audit Reports
- Billing system screenshots
- Business unit position statements
- Compliance Reports
- Communication letters, emails, and memorandums
- Correspondence registers
- Customer bills
- Excel based information registers
- Fact Sheets
- Geospatial maps

- Management reports
- Memorandum of Understanding / Agreements
- Operating maps
- Performance reports
- Policies, procedures, and guidelines
- Procedural templates
- Standards, manuals, and plans
- System data extracts
- Training presentations
- Water Services Licences
- Work instructions and process flow charts
- Work orders



2.7 Compliance Reports & Registers

The following compliance reports and registers were reviewed as part of our preliminary risk assessment and again during fieldwork:

- Aqwest's Annual Compliance Report to the ERA for the period 1 October 2020 to 30 September 2023; and
- February 2021 Post Audit Implementation Plan submitted to the ERA.

2.8 Work Schedule

The Operational Audit was proposed to be undertaken in accordance with the following schedule:

Table 5: Proposed Work Schedule

| Activity | Timing | Team Member(s) |
|--|-------------------------------------|--|
| Meeting with the Authority and Aqwest | 28 July 2023 | Duy Vo |
| Engage with Aqwest to conduct risk assessment | 11 August 2023 | Duy Vo Shifaz Moosa Cameron Cantwell |
| Submission of the final Draft Audit Plan to the Authority for review | 18 August 2023 | Duy Vo Conley Manifis Shifaz Moosa |
| The Authority provides feedback on the Draft Audit Plan | 22 September 2023 | |
| The Authority approves the Final Audit Plan | 18 October 2023 | |
| Conclude fieldwork activities; review of work papers and issues log | 3 November 2023 | Duy Vo Mark Hofmann Kaylan Naicker |
| Exit interviews with Aqwest stakeholders | Week commencing 13 November 2023 | Duy Vo Mark Hofmann Kaylan Naicker |
| Draft Audit Report provided to the ERA for review | 22 January 2024 | Duy Vo Mark Hofmann Kaylan Naicker |
| ERA provides comments on draft audit report to the contractor | 23 February 2024 | Duy Vo Mark Hofmann Kaylan Naicker |
| Final audit report provided to the ERA | 23 April 2024 | Duy Vo Conley Manifis Mark Hofmann Kaylan Naicker |



2.9 Audit Team

Table 6: William Buck's Audit Team

| Name | Role | Hours |
|------------------|----------------------------|-------|
| Conley Manifis | Quality Assurance Director | 10 |
| Duy Vo | Engagement Director | 40 |
| Mark Hofmann | Manager | 40 |
| Kaylan Naicker | Assistant Manager | 40 |
| Shifaz Moosa | Senior Auditor | 50 |
| Cameron Cantwell | Auditor | 50 |

2.10 Assessment of the Control Environment

Given the size and scope of Aqwest's business, we consider the control environment to be reasonable and commensurate with the organisation's risk profile.

We found Aqwest has appropriate risk management arrangements to monitor emerging risks and address compliance issues in a timely manner. Interviews conducted with management indicated management operated in a risk conscious manner cognisant of compliance risks.

Authority and responsibilities are defined within the policies and procedures underpinned by organisational structure directed by leadership, shared values and a culture that emphasises accountability for control.

The compliance issues identified were primarily administrative in nature with limited impact on customers.

We note that there is a number of obligations while applicable to Aqwest, however, was not in use because of the size, scope of operations, and organisation's stance such as not lodging a memorial or not entering into customer's properties, etc. From a pragmatic point of view, we have not rated those instances/obligations as deficient in controls and recommended actions. Should Aqwest consider undertaking those activities in future, it would be advisable to develop policy, procedures and processes relevant to those obligations.

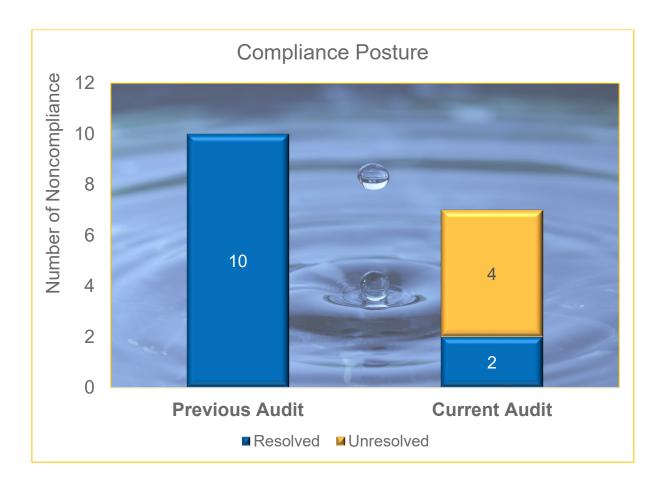


2.11 Assessment of Compliance

Figure 1, Compliance Posture, outlines Aqwest's non-compliance history over the last two (2) Operational Audits for trend analysis of breaches that occurred.

Aqwest's compliance posture remains 'steady' over the last two cycles of audit.

It appears that our audit identified matters that Aqwest had not detected indicated by the number of unresolved matters before the end of fieldwork.





2.12 Assessment of Aqwest's Response to Previous Audit Recommendations

The table below summarises the recommendations arising from the previous Operational Audit of Aqwest and the responses to those recommendations by Aqwest.

Table 7: Summary of All Audit Non-Compliances and Recommendations

| A. Resolved during current audit period | | | | |
|---|---|--|-----------------------------|--|
| Licence obligation reference no. / Recommendation reference from previous audit (if applicable) | Non-compliance / Control Improvements (Rating / Licence obligation / Details of non-compliance or inadequacy of controls) | Date resolved & action taken by the licensee | Auditor's comments | |
| PREVIOUS AUDIT NON-COMPLIAN | ICE AND RECOMMENDATIONS | | | |
| 89 | A3 | July 2021 | No further action required. | |
| (1/2020) | Water Services Regulation 80H. Operating licence Clause 4.1.1 | Aqwest implemented the following recommendations: | | |
| | - Compliance notices issued by the licensee must include a brief description of the possible consequences under the Act of not complying with the notice, and the rights of review under the Act in | Aqwest must ensure compliance notices comply with regulation 85 of the Regulations by: — Including a brief description of the possible consequences under the Act of not complying with the notice; and | | |



A. Resolved during current audit period

relation to the notice and who may apply for review.

Details of non-compliance or inadequacy or controls

- 1. The 2020 Operating Licence Audit identified "Inadequate access to meter" notices did not contain the rights of review under the Act in relation to the notice and who may apply for review.
- 2. 118 incorrect letters were issued.
- 3. The breach occurred due to an oversight in preparing template notices.
- 4. A review of complaints was undertaken to determine if any customers had been disadvantaged. No impact was identified.
- 5. The template notices and process has been updated to comply with the obligation. All staff have been briefed to understand the obligation Aqwest was fully compliant with the requirement by 1 July 2021.

 Referring to the right of review under the Act in relation to the notice and who may apply for review.



A. Resolved during current audit period **A2** January 2021 No further action required. Aqwest implemented the following Water Services Code of Conduct (Customer Service Standards) recommendations: 2018 Clause 8(1) to (3) Operating Agwest publicly make available licence Clause 4.1.1 appropriate reference to the following **Licence Obligation Detail** stipulations of clause 8(2) of the 2018 Code of Conduct: The licensee must have written information for Entitlements under section 73 of customers about the the Act to the provision of water prescribed matters regarding connections and the supply services; and information must be publicly available. 92 Agwest's functions under section Details of non-compliance or 21 concerning the provision of (2/2020)inadequacy or controls water supply services. 1. The 2020 Operating Licence Audit identified Aqwest "service connections" web page was missing the following information between 1 July 2020 and 31 January 2021. a) Entitlements under section 73 of the Act to the provision of water supply services; and b) Agwest's functions under section 21 concerning the provision of water supply services.



| A. Resolved during current audit p | eriod | | |
|------------------------------------|---|--|-----------------------------|
| | No impact on customers already connected. No complaints or enquiries from potential customers. No connection refused. The breach occurred due to an oversight in preparation of the webpages. The website was updated to comply with the obligation. The requirement to include these matters is now included in the website compliance checklist which is used as a regular check on information provided through the website. Aqwest was fully compliant from 1 January 2021. | | |
| 102A (3/2020) | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(6). Operating licence Clause 4.1.1 Licence Obligation Detail — Each bill must contain the prescribed information. Details of non-compliance or inadequacy or controls | February 2021 Aqwest implemented the following recommendations: Aqwest must ensure tax invoices comply with clauses 13(6)(h) and 13(6)(i) of the 2018 Code of Conduct respectively by stating: | No further action required. |



A. Resolved during current audit period

- 1. The 2020 Operating Licence
 Audit identified tax invoices issued
 to customers between 1/7/2020 and
 31/1/2021 did not include notices
 that the website contains
 information about complaints or that
 bills could be reviewed in
 accordance with the Aqwest bill
 review procedure.
- 2. Two invoices per customer did not include the information. No licensees affected.
- 3. The breach occurred due to an oversight in the preparation of the invoice template.
- 4. The template has been updated to reflect all the prescribed requirements.
- 5. To prevent recurrence, the obligation has been included in the process to update the invoice template.
- 6. Aqwest was fully compliant by 1 February 2021.

- Website contains information about complaints; and
- Bill can be reviewed in accordance with the licensee's review procedure mentioned in clause 20 of the 2018 Code of Conduct.



| A. Resolved during current audit p | A. Resolved during current audit period | | | | |
|------------------------------------|---|--|-----------------------------|--|--|
| 107 (4/2020) | License Obligation No 107 Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(2) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 Licence Obligation Detail — The licensee cannot recover an undercharged amount from a customer unless it is for water services provided in the 12-month period ending on the day on which the licensee informed the customer of the undercharging. | September 2023 (resolved in current audit) Aqwest implemented the following recommendations: Aqwest must ensure it complies with clause 18(2) of the 2018 Code of Conduct. Aqwest must limit the recovery of undercharged amounts from customers to water services provided in the 12-month period ending on the day Aqwest informs the customer of the undercharging. | No further action required. | | |
| | Details of non-compliance or inadequacy or controls — Examined a sample of tax invoices and supporting letters issued during the Audit Period regarding undercharged amounts. One | | | | |



| A. Resolved during current audit period | | | | |
|---|--|--|-----------------------------|--|
| | sample set of documents shows Aqwest recovered an undercharged amount for a period more than 12 months back from the day Aqwest informed the customers of the undercharging. Both the sampled letter and the tax invoice dated 6/06/2019 includes charges for a read dated 6/5/2018. | | | |
| 116 5/2020 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(4) Operating Licence Clause 4.1.1 Licence Obligation Detail The review procedure must state that the customer may, but does not have to, use the licensee's complaints procedure mentioned in clause 46 before or instead of applying to the water services ombudsman or, if available, making an appeal from, or applying for a review of, the | September 2023 (During the Current Audit Period) Aqwest must update its "Bill Review" statement to include an appropriate reference to making an appeal from, or applying for a review of, the decision under regulations mentioned in section 222(2)(k) of the Act. We recommend that Aqwest rephrase the statement to ensure that it clearly outlines the option for customers to refer to Aqwest's complaints procedure, if they want, before or instead of applying to the | No further action required. | |



A. Resolved during current audit period mentioned in section 222(2)(k) of the Act. Details of non-compliance or inadequacy of controls 1. The 2020 Operating Licence Audit identified the bill review procedure and supporting documents referred to applying to the Water Services Ombudsman for a review but did not refer to the right of applying the State Administration Tribunal under Section 222(2)(k) for the period 31 July 2020 to 31 December 2020. 2. Impact was minimal because customers were advised of their right to apply to the Ombudsman. 3. At the time templates were prepared the distinction between the Ombudsman and the State Administrative Tribunal was not understood. 4. A review of complaints, including Ombudsman referrals was undertaken. No relevant issues were identified.



| A. Resolved during current audit period | | | | |
|---|--|---|-----------------------------|--|
| | 5. Bill review process and the template statement have been updated to comply with the obligation. All staff have been briefed to understand the obligation.6. Aqwest was fully compliant from 11 February 2021. | | | |
| 130A (6/2020) | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Licence Obligation Detail The licensee must advise a customer who has been assessed as experiencing financial hardship that they have a right to pay the bill under an interest-free and fee-free payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into | September 2023 (resolved in current audit) Aqwest implemented the following recommendations: Aqwest should clearly record in its payment plans whether such plans are entered into due to an assessment of: — Payment difficulties; or — Financial hardship This distinction is vital as the levy of interest and fees are: — Discretional for payment plans based on assessed payment difficulties; and — Prohibited for payments plans based on assessed financial hardship. | No further action required. | |



| A. Resolved during curr | ent audit period | | |
|-------------------------|---|--|-----------------------------|
| | an appropriate plan or arrangement with the customer. | | |
| | Details of non-compliance or inadequacy or controls | | |
| | Actual payment plans entered into with customers should distinguish between assessment based on payment difficulties (on which interest can be charged) and financial hardship (on which no interest can be charged). Such important information should not be provided to customers at a later stage as evidenced by the e-mails and letter referred to above. | | |
| 137C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(3) OL 16: Clause 4.1.1 | September 2023 (resolved in current audit) Aqwest implemented the following | No further action required. |
| (7/2020) | OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 | recommendations: Aqwest must include appropriate references in its restriction notices to the following stipulations of clause 36(3) of the 2018 Code of Conduct: | |



A. Resolved during current audit period

Licence Obligation Detail

The restriction notice must include the specified information.

Details of non-compliance or inadequacy or controls

The sample of restriction notices does not:

- Inform the customer of the existence and operation of the licensee's complaints procedure mentioned in clause 46;
- Inform the customer of the procedures available to the customer under the Act as to applying to the water services ombudsman under a scheme approved under section 65 and provide a Freecall telephone number for the office of the water services ombudsman; and
- Inform the customer of the applicable procedures for the restoration of the water supply if the water supply restriction is started.

- Existence and operation of the licensee's complaints procedure mentioned in clause 46;
- Procedures available to the customer under the Act as to applying to the water services ombudsman under a scheme approved under section 65, including, providing a Freecall telephone numbers for the office of the water services ombudsman; and
- Applicable procedures for the restoration of the water supply once the water supply restriction has started.



| A. Resolved during current audit p | A. Resolved during current audit period | | | |
|------------------------------------|---|---|-----------------------------|--|
| | A2 | April 2021 | No further action required. | |
| | Water Services Code of Conduct (Customer Service Standards) 2018 46(2) Operating Licence Clause 4.1.1 | Aqwest implemented the following recommendations: Aqwest should update its complaints procedure to ensure it complies with | | |
| 146 | - The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's guidelines (if any). Details of non-compliance or | AS/NZS 10002-2014. | | |
| (8/2020) | inadequacy or controls 1. The 2020 Operating Licence Audit identified the complaints procedure had aspects that did not comply with AS/NZS 1002-2014 for the period 1 July 2020 to 31 March 2021. | | | |
| | 2. Components that did not comply related predominantly to the protection of staff. There was no impact on the management of customer needs. | | | |
| | Aqwest increased focus on complaint management in April | | | |



| A. Resolved during current audit p | eriod | | |
|------------------------------------|--|---|-----------------------------|
| | 2020 and self-identified gaps that needed to be addressed. Not all gaps had been addressed at the time of the audit. 4. A project was undertaken to address gaps in procedures and documents. 5. Complaint procedures now include a reference to the standard. 6. Aqwest was fully compliant with the standard from 1 April 2021. | | |
| 148A (9/2020) | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(4). Operating Licence Clause 4.1.1 Licence Obligation Detail The licensee's complaints procedure must list the procedures available to the customer under the Act as to applying to the water services ombudsman or making an appeal from, or applying for a review of, the decision that | February 2021 Aqwest implemented the following recommendations: Aqwest's complaints procedure, as available on the internet, must list the procedures available to the customer under the Act as to: — Applying directly to the Water Services Ombudsman; or — Making an appeal from, or applying for a review of, the decision that gave rise to the | No further action required. |



A. Resolved during current audit period

gave rise to the complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k).

Details of non-compliance or inadequacy or controls

- 1.The 2020 Operating Licence Audit identified that the Aqwest website did not include all mechanisms for complaint or appeal for the period July 2020 to December 2020.
- 2. The effect on customers was that information provided was incomplete.
- 3. The cause was an oversight when creating the new website.
- 4.Once the matter was discovered, the website was updated.
- 5. The requirement to include these matters is now included in the website compliance checklist which is used as a regular check on information provided through the website.

complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k) of the Act.



| A. Resolved during current audit period | | | | |
|---|---|--|-----------------------------|--|
| | Aqwest was fully compliant with this requirement from 16 February 2021. | | | |
| 154 (10/2020) | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(2). Operating Licence Clause 4.1.1 Licence Obligation Detail — The licensee must ensure that the specified information about bills may be obtained from its website. Details of non-compliance or inadequacy or controls 1. The 2020 Operating Licence Audit identified that website information about bills did not include advice that a customer could request a meter reading and/or a revised bill should they dispute the basis of an estimate for the period 01 July 2020 to 31 January 2021. | March 2021 Aqwest implemented the following recommendations: Aqwest must ensure that its website contains information stating that in the case where a customer disputes an estimate on which a bill is based, the customer may request a meter reading (if the water service is metered and the meter is operable) and in any event a revised bill and that if the customer so requests, information about the fees that apply. | No further action required. | |



A. Resolved during current audit period 2. The effect on customers was that information provided was incomplete. 3. The cause was an oversight when creating the new website. 4. Once the matter was discovered, the website was updated. 5. The requirement to include these matters is now included in the website compliance checklist which is used as a regular check on information provided through the website. 6. Aqwest was fully compliant with this requirement from 20 March 2021.



2.13 Summary of Current Audit Findings and Recommendations

The table below summarises the recommendations arising from the current audit and detailed in Section 4 of this report.

Table 8: Summary of Current Audit Non-Compliances and Recommendations

| A. Resolved during current audit period | | | |
|---|--|---|-----------------------------|
| Licence obligation reference no. / Recommendation reference from previous audit (if applicable) | Non-compliance / Control Improvements (Rating / Licence obligation / Details of non-compliance or inadequacy of controls) | Date resolved & action taken by the licensee | Auditor's comments |
| CURRENT AUDIT NON-CO | MPLIANCE AND RECOMMENDATIONS | | |
| 93 (Not Applicable) | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 9(2) and (4) WL 2: Version 10: Clauses 4.1.1 WL 2: Version 11: Clauses 4.1.1 Licence Obligation Detail The licensee must ensure that, in any 12-month period, 90% of water supply service connections are completed before the end of 10 business days, starting on the day on which the customer has paid the relevant fees and complied with the relevant requirements. Details of non-compliance or inadequacy or controls | September 2023 (During the Current Audit Period) Aqwest implemented the following recommendations: Aqwest should follow the controls that are in place to ensure the completion of water supply service connections before the end of 10 business days. Whilst Aqwest was not compliant for the period FY 2021/22 (compliance ratio of only 88%), it was compliant for the period FY2022/23 where the compliance | No further action required. |



| A. Resolved during current audit period | | | |
|---|---|--|-----------------------------|
| | We reviewed the 'Timeliness of Connections 2020-2021', which is an analytical extraction that calculates the performance of Aqwest in terms of this obligation. We noted that Aqwest met the required performance target at 92% for this period 2022-2023. Based on the 'Timeliness of Connections 2022-2023' document, 88% of water supply service connections were completed before the end of 10 business days. In the Annual Compliance Report for 30 June 2022, Aqwest was only able to demonstrate 80% of connections were completed within 10 working days. 11 out of 82 connections were completed after the end of 10 business days. | ratio is 92% which exceeds that target of 90%. | |
| 95 (Not Applicable) | License Obligation No 95 Obligations: 2018 Code of Conduct, clause 11(2) and WL2 version 10, clause 4.1.1 Licence Obligation Detail — If the licensee charges a quantity charge, the licensee must issue a bill -for a quantity charge to each customer at least once in every 4-month period. Details of non-compliance or inadequacy or controls | February 2023 (During the Current Audit Period) Aqwest implemented a set of controls to address the noncompliance of the obligation. The following controls have been implemented: — Aqwest issues bills to customers who have quantity charges on a quarterly basis. | No further action required. |



A. Resolved during current audit period 1. One customer was not issued a bill within 4 months following a meter replacement. Missing bill was due to customer on 21/11/2022. 2. One customer was affected. The bill related to the period ending 21/11/2022. No bill was issued between 19/08/2022 and 22/02/2023. 3. The breach occurred because the team did not issue an estimated bill while undertaking an investigation of missing information. 4. The bill was issued late, and the customer offered an interest-free payment plan. 5. All billing team members were made aware of the incident and trained on the use of estimated bills, where data is not available for billing. 6. Aqwest was compliant by 09/02/2023.



| Recommendation Reference (no./year) | Non-compliance / Control improvement (Rating / Licence obligation reference number & licence obligation / Details of non-compliance of inadequacy of controls) | Auditor's Recommendations | Action taken by the licensee by end of audit period. |
|---|---|--|--|
| CURRENT AUDIT NO | N-COMPLIANCE AND RECOMMENDATIONS | | |
| (1/2023) | License Obligation No 75 Water Services Regulations 2013 Regulation 63 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | Aqwest should implement an internal monitoring process (e.g., the use of final inspection certificate tracking sheet) to timely identify completion of projects involving breaking the surface of the road so that a corresponding Final Inspection Certificate is issued without delay. | No action taken yet. |
| | Licence Obligation Detail If the licensee opens or breaks up the surface of a road, the licensee must complete the relevant work and reinstate and make good the road and must take all reasonable measures to prevent that part of the road from being hazardous. | | |
| | Details of issues There were two instances involving breaking the surface of the road in which a Final Inspection Certificate was not evident. Therefore, it could not | | |



| | be determined if the road had been returned to its final state. | | |
|----------|--|---|----------------------|
| (2/2023) | License Obligation No 137B Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Licence Obligation Detail The licensee must not give a customer a restriction notice less than 7 days before the day on which the water supply restriction is proposed to start. Details of issues In reviewing 9 sample accounts, we did detect (1) instance of breaching the condition of 7 days' notice period. AC41140294 - Restriction Notice was issued on 28/04/2022 while restriction would take place sometime in the week commencing 02/05/2022. Customer was given 4 days' notice, and the restrictor was installed 6 days after the notice. | Aqwest should comply with the license obligation and prevent issuing restriction notice of less than 7 days before the day on which the water supply restriction is proposed to start. To ensure that this is consistently applied, Aqwest should implement a second review by another officer to signoff on the restriction notice prior to sending to customers. | No action taken yet. |



B. Unresolved at the end of the current audit period

(3/2023)

A2

License Obligation No 149A

Water Services Code of Conduct (Customer Service Standards) 2018 Clause 47

WL 2: Version 10: Clause 4.1.1

WL 2: Version 11: Clause 4.1.1

Licence Obligation Detail

— When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman.

Details of issues

- Our review of 5 complaints identified 2 breaches that did not comply *Clause 47* as the responses did not include the customers right to appeal to the Ombudsman for review if needed.
- Although in these cases, the customers were either verbally or through email communicated if they were satisfied with the response, it fails to address or inform the customer about their

Whilst Aqwest has an existing template that embeds the statement about the customers right to appeal to the Ombudsman, we recommend that Aqwest consistently utilise this template when responding to customers upon the resolution of complaints.

To ensure that Aqwest staff consistently use the template when responding to customers, it should implement an internal review or sign-off procedure where the response is reviewed by another officer prior to sending to customer.

No action taken yet.



| | right to appeal to the Ombudsman for a review of the complaint if needed. | | |
|----------|---|---|----------------------|
| (4/2023) | License Obligation No 153 Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Licence Obligation Detail The licensee must make the prescribed information publicly available. Details of issues Through reviewing Aqwest website and discussions with relevant personnel, we determined that the following prescribed information in 49(1)(h) are not publicly available: Section 49(1) states, inter alia that, A licensee need to make information about the following information to be publicly available— (h) that if the customer is offered a payment plan or other arrangement giving the customer more time to pay the bill or to pay arrears, the licensee's power as mentioned in paragraph (g) can only be exercised if – the customer has not accepted the offer within the period of 7 | Aqwest should update the website to clearly specify the statement 'it may restrict supply if the customer does not accept an offer of a payment plan within seven (7) days. | No action taken yet. |



B. Unresolved at the end of the current audit period

days after the day on which it was made: or having entered such a plan or other arrangement, the customer does not comply with it.

The condition in 49(1)(h) is only enlivened when the customer fails to pay the required debt to the corporation and the customer is provided more time to pay the bills or to pay arrears.

If the customer does not accept the offer of arrangement within 7 days or does not comply with the arrangement executed, Aqwest can exercise the power as mentioned in paragraph 49(1)(g).

Aqwest's approach is to negotiate an outcome that is mutually acceptable which factors in the customer's specific circumstances when engaging with the customers who are having payment difficulty.

This interaction with the customer is agreed and finalised in the initial conversation/communication. Aqwest's does not offer a payment plan without the customer's agreement and then advise them that they must accept the offer within 7 days.

Accordingly, Aqwest website does not have information, which states it may restrict supply if



| B. Unresolved at the end of the current audit period | |
|---|--|
| the customer does not accept an offer of a payment plan within 7 days. | |
| Aqwest's approach is customer-centric, we consider the Code in this regard to be prescriptive and requires the requisite information to be provided publicly. | |
| The licensee was not compliant with this obligation throughout the reporting period. | |



3. Performance Summary

We have assessed Aqwest's compliance and controls using the rating scales prescribed by the Audit Guidelines in Table 9 below.

Table 9: Compliance and Controls Rating Scales

| | Adequacy of Controls Rating | | Compliance Rating |
|--------|--|--------|---|
| Rating | Description | Rating | Description |
| Α | Adequate controls – no improvement needed | 1 | Compliant |
| В | Generally adequate controls – improvement needed | 2 | Non-compliant – minor effect on customers of third parties |
| С | Inadequate controls – significant improvement required | 3 | Non-compliant – moderate effect on customers or third parties |
| D | No controls evident | 4 | Non-compliant – major effect on customers or third parties |
| N/P | Not performed – A control rating was not required | N/R | Not rated – No Activity took place during the audit period |

Table 10 Compliance Performance Summary outlines the compliance and controls rating for each obligation.

Table 10: Summary of Performance Assessment

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 1 | Water Services Act Section 21(1)(a) | WL2 Version 10: Clause 4.3.1(a) WL2 Version 11: Clause 4.3.1(a) The licensee must provide a water service authorised by the license to persons entitled to the service under the Act, except to the extent otherwise provided for by the Act. | 1 | 2 | * | | | | | √ | | | | |
| 2 | Water Services Act Section 21(1)(b) | WL 2: Version 10: Clause 4.3.1(b) WL 2: Version 11: Clause 4.3.1(b) The licensee must if requested, offer to provide the water service authorised by the license to any other person (not covered by section 21(1)(a) of the Act) within the operating area of the license on reasonable terms, unless provision of the service is not financially viable or is otherwise not practicable. | 2 | 4 | 4 | | | | | | | | | ✓ |
| 3 | Water Services Act Section 21(1)(c) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must provide, operate and maintain the water service works specified by the ERA in the license for the purposes of section 11(3). | 2 | 4 | ✓ | | | | | √ | | | | |
| 4 | Water Services Act Section 22 | WL 2: Version 10: Clause 4.4.1(a) WL 2: Version 11: Clause 4.4.1(a) | 2 | 4 | | | | | ✓ | | | | | ✓ |

| N | Obligations | Licence | T | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | gs |
|-----|--|--|----------|----------|----------|-------|--------|-------|-----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | | The licensee must notify the ERA as soon as practicable before commencing to provide the water service outside of the operating area of the license. | | | | | | | | | | | | |
| 5 | Water Services Act Section 23 | WL 2: Version 10: Clause 4.5.1 WL 2: Version 11: Clause 4.5.1 All water service works used by the licensee in the provision of a water service must be held by the licensee, or must be covered by a works holding arrangement. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 6 | Water Services Act Sections 24(1)(a) & 24(2) | WL 2: Version 10: Clause 5.1.1 WL 2: Version 11: Clause 5.1.1 The licensee must provide for an asset management system in respect of the licensee's water service works. | 2 | 4 | √ | | | | | √ | | | | |
| 7 | Not used | | | | | | | | | | | | | |
| 8 | Water Services Act Section 24(1)(c) | WL 2: Version 10: Clause 5.1.4 WL 2: Version 11: Clause 5.1.4 A licensee must provide the ERA with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA. | 2 | 4 | √ | | | | | * | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|--|--|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | | | | | | | | | | | | | | |
| 9 | Water Services Act Section 25 | WL 2: Version 10: Clause 5.3.1 WL 2: Version 11: Clause 5.3.1 A licensee must, not less than once every 24 months, or such longer period as determined by the ERA, provide the ERA with an operational audit conducted by an independent expert appointed by the ERA. | 2 | 4 | ~ | | | | | ✓ | | | | |
| 10 | Water Services Act Section 26(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must comply with each code of practice made by the Minister to the extent to which it applies to the licensee. | 2 | 4 | √ | | | | | ✓ | | | | |
| 11 | Not used | | | | | | | | | | | | | |
| 12 | Not used | | | | | | | | | | | | | |
| 13 | Water Services Act Section 36 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee ceases to provide a water service in an area, the licensee must ensure that the water service works are left in a safe condition and must not remove any part of the works except with the approval of the Minister. | 2 | 4 | 4 | | | | | | | | | * |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|--|--|------|----------|----------|-------|--------|-------|----|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 14 | Water Services Act Section 60 | WL 2: Version 10: Clause 6.3.1 WL 2: Version 11: Clause 6.3.1 If the licensee is the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of the supplier of last resort and must comply with the relevant duties and carry out the relevant operations prescribed. | 2 | 4 | * | | | | | | | | | ✓ |
| 15 | Water Services Act Section 70(2) | WL 2: Version 10: Clause 6.2.1 WL 2: Version 11: Clause 6.2.1 The licensee must not supply water services to customers unless the license: - is a member of the water services ombudsman scheme; and - is bound by the scheme; and - will comply with any decision or direction of the water services ombudsman under the scheme. | 2 | 2 | * | | | | | ✓ | | | | |
| 16 | Water Services Act Section 77(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for. | 2 | 3 | * | | | | | ✓ | | | | |

| No | Obligations | Licence | Toma | Audit | Ad | equac | y of C | ontro | ols | С | ompli | iance l | Rating | gs |
|-----|---|---|------|----------|----------|-------|--------|-------|-----|-----|-------|---------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 17 | Water Services Act Sections 82(4) & (5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a person must give the licensee notice of any building work to be carried out on land in the operating area of the license, the licensee must return a copy of the plans and specifications contained in the notice with any written directions about the proposed building work that the licensee considers necessary to ensure the safety and efficacy of the provision of water services provided, or to be provided. The licensee must do this within 7 days of receiving the fee for dealing with the notification. | - | - | | | | | N | I/A | | | | |
| 18 | Water Services Act Section 84(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has given a notice under section 83(3)(a) of the Act, and the licensee is satisfied that the person given the notice is not going to comply with the notice within a reasonable time, the licensee must give the person 21 days' notice of its intention to commence the works. | 2 | 3 | ✓ | | | | | | | | | ✓ |
| 19 | Water Services Act Section 87(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a person makes an application with the State Administrative Tribunal for a review of a decision in respect of the licensee providing additional water services when a person has not responded to the licensee's notice, the licensee cannot provide | 2 | 3 | √ | | | | | | | | | ~ |

| N- | Obligations | Licence | - | Audit | Ad | equac | y of C | ontro | ls | С | ompli | iance | Rating | gs |
|-----|--|---|------|----------|----------|-------|--------|-------|----------|----------|-------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | | the works until the application has been finally dealt with, except in limited circumstances. | | | | | | | | | | | | |
| 20 | Water Services Act Section 90(7) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee gives a compliance notice to a person who is undertaking construction or carrying out similar works in the vicinity of water service works, the licensee must, to the extent practicable, consult with the owner of the land on which the obstruction is located or the activity is taking place if the person to be given the notice is not the owner of the land. | NR | 5 | | | | | ✓ | | | | | 1 |
| 21 | Water Services Act Section 95(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that. | 1 | 1 | ✓ | | | | | √ | | | | |
| 22 | Water Services Act Section 96(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee provides water supply reticulation works, or enters into an agreement for the provision of water supply reticulation works, the licensee must install fire hydrants attached to those install works in accordance with the | 2 | 4 | ~ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Ratin | gs |
|-----|---|---|------|----------|----------|-------|--------|-------|-----|------------|------|-------|-------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | | requirements of FESA, or the relevant local government as to the location and type of hydrant. | | | | | | | | | | | | |
| 23 | Water Services Act Section 96(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 10: Clause 4.1.1 The licensee must comply with requests made by FESA or a local government under sections 96(3) and 96(4) of the Act to the extent practicable and within a reasonable time. | NR | 4 | √ | | | | | √ | | | | |
| 24 | Water Services Act Section 98(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If required to by the Minister, the licensee must connect a wastewater inlet on land to the sewerage works of the licensee. | 2 | - | | | | | N | / A | | | | |
| 25 | Water Services Act Section 106(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must include the information specified in a compliance notice given in relation to failure to maintain fittings, fixtures, and pipes. | 2 | - | | | | | N | / A | | | | |
| 26 | Water Services Act Section 110(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If required to by the Minister, the licensee must connect a drainage asset on land to the drainage works of the licensee. | 2 | - | | | | | N | / A | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompli | ance | Rating | gs |
|-----|---|---|------|----------|----------|-------|--------|-------|----------|------------|-------|------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 27 | Water Services Act Section 112(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If required by the Minister, the licensee must modify the property drainage connection. | 2 | - | | | | | N | / A | | | | |
| 28 | Water Services Act Section 119(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 199(1). | 2 | 4 | | | | | ✓ | | | | | * |
| 29 | Water Services Act Section 122(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a person makes an application to the State Administrative Tribunal under section 122(1), the licensee cannot take, or continue to take, action against the person except in the circumstances specified. | 2 | 4 | ~ | | | | | | | | | * |
| 30 | Water Services Act Section 125(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee provides a water supply, sewerage or drainage service to 2 or more dwellings on land by a single property connection, the licensee may apportion fees. The licensee cannot apportion fees to the extent inconsistent with any | 2 | 4 | ✓ | | | | | | | | | ✓ |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | C | ompli | ance l | Rating | gs |
|-----|---|---|------|----------|----------|-------|--------|-------|----------|---|-------|--------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | | agreement related to such a provision of services, or section 66 of the Strata Titles Act 1985. | | | | | | | | | | | | |
| 31 | Water Services Act Section 128(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with the Registrar along with the prescribed fee (if any) if the charge or contribution has been paid. | 2 | 3 | | | | | √ | | | | | √ |
| 32 | Water Services Act Section 129(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a routine inspection or maintenance is likely to cause disruption to the occupants of a place at least 48 hours' notice of a proposed entry must be given to the occupier of the place unless the occupier agrees otherwise. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 33 | Water Services Act Section 139(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee removes or erects a fence or gate when exercising a works power conferred by the Act, the licensee must take all reasonable steps to notify the owner before doing so. | NR | 4 | | | | | * | | | | | * |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratin | gs |
|-----|--|--|------|----------|----|----------|--------|-------|----------|----------|------|-------|-------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 34 | Water Services Act Section 141(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A person authorised by the licensee may enter a road and exercise a works power of the licensee without consent, notice or warrant unless the exercise of the power involves opening or breaking up the surface of the road, or would cause a major obstruction of the road or disruption of the traffic, in which case the licensee must give at least 48 hours' notice to the public authority that has control or management of the road. | 2 | 3 | | * | | | | √ | | | | |
| 35 | Water Services Act Sections 142 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must comply with sections 143 and 144 of the Act in relation to the proposed major works, and has given any notice required by section 148. | 2 | 4 | | | | | * | | | | | ~ |
| 36 | Water Services Act Sections 143(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Before the licensee submits a proposal for the provision of major works to the Minister, the licensee must prepare, publish and make available plans and details of those major works as specified. | 2 | 4 | | | | | ✓ | | | | | ~ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|--|---|------|----------|----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 37 | Water Services Act Sections 143(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must, within 5 days of publishing the plans and details on the licensee's website, give notice setting out the matters prescribed in section 143(4) to the persons and agencies specified. | 2 | 4 | | | | | √ | | | | | ✓ |
| 38 | Water Services Act Sections 144(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have regard to an objection or submission lodged within the relevant period. | 2 | 4 | | | | | ✓ | | | | | ✓ |
| 39 | Water Services Act Section 145(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee makes alterations to the plans or detailed referred to in section 143(2), the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations. | 2 | 3 | | | | | 4 | | | | | ✓ |
| 40 | Water Services Act Sections 147(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must comply with a direction given by a Minister in respect of a proposal to provide water service works that are major works under section 143(3) | 2 | 4 | | | | | √ | | | | | ✓ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | C | ompl | iance | Rating | gs |
|-----|--|---|------|----------|----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 41 | Water Services Act Section 147(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the Minister gives a direction that further notices in relation to the proposed major works be given under section 143(3), the licensee must resubmit the proposal. | 2 | 4 | | | | | ✓ | | | | | ✓ |
| 42 | Water Services Act Section 151(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A licensee proposing to provide water service works that are general works must prepare plans and details of the proposed works and publish and make them available for inspection. | 2 | 3 | | | | | ✓ | | | | | ✓ |
| 43 | Water Services Act 151(2) Section 151(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must give a notice of general works setting out the matters referred to in section 151(3) to the persons and agencies specified. | 2 | 3 | | | | | √ | | | | | ✓ |
| 44 | Water Services Act Section 152(3) | WL: Version 10: Clause 4.1.1 WL: Version 11: Clause 4.1.1 | 2 | 3 | | | | | ✓ | | | | | ✓ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | | The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2). | | | | | | | | | | | | |
| 45 | Water Services Act Section 153(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee makes alteration to those plans or details referred to in section 151, the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations. | 2 | 4 | | | | | * | | | | | * |
| 46 | Water Services Act Section 166(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 On being advised by the Minister that an interest in land is appropriate to the licensee's needs, the licensee is required to acquire the interest. | 2 | 4 | | | | | * | | | | | ✓ |
| 47 | Water Services Act Section 166(6) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Any costs incurred in taking an interest in land are to be paid by the licensee. | 2 | 4 | | | | | ✓ | | | | | ✓ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|---|------|----------|----------|-------|--------|-------|----|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 48 | Water Services Act Section 170 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not sell an interest in land if the purchaser would hold a parcel of land that did not comply with the minimum lot size and zoning requirements under the Planning and Development Act 2005, unless the Minister permits the licensee to do so. | 2 | 4 | | | | | * | | | | | ✓ |
| 49 | Water Services Act Section 173(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 In relation to entry to a place for the purposes of doing works, in the circumstances specified the licensee is required to give 48 hours' notice of proposed entry place to the occupier or owner, as applicable, unless the occupier or owner agrees otherwise. | 2 | 3 | √ | | | | | | | | | ✓ |
| 50 | Water Services Act Section 174(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry, including (if applicable) any work proposed to be carried out. | 2 | 3 | ~ | | | | | | | | | * |

| N | Obligations | Licence | T | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|----------|----------|----------|-------|--------|-------|----|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 51 | Water Services Act Section 174(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Even if in a particular instance the licensee may enter a place under the Act without having to give notice of proposed entry, the licensee must when practicable, and when it will not compromise the reason for entry, give notice of entry to the occupier. | 2 | 3 | * | | | | | | | | | * |
| 52 | Water Services Act Section 175(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If an occupier is present when the licensee proposes to enter a dwelling, the licensee must perform the prescribed actions before entering the premises. | 2 | 2 | √ | | | | | | | | | ✓ |
| 53 | Water Services Act Section 175(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee enters a dwelling that is unoccupied, the licensee must leave a notice, which includes the prescribed information, or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling. | 2 | 3 | V | | | | | | | | | ~ |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----------|-------|--------|-------|----|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 54 | Water Services Act Section 176(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has entered a place with or without consent, the licensee must leave the premises as soon as practicable after being notified that the owner or occupier has refused or withdrawn their consent. | 2 | 4 | 4 | | | | | | | | | * |
| 55 | Water Services Act Section 176(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so. | 2 | 4 | ~ | | | | | | | | | ✓ |
| 56 | Water Services Act Section 176(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee enters or proposes to enter a place, and the owner or occupier requests the licensee produce evidence of authority for that entry, then the licensee must leave the place if they are unable to do so unless the owner or occupier agrees otherwise. | 2 | 4 | ✓ | | | | | | | | | 1 |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----------|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 57 | Water Services Act Section 181 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee, or a person assisting the licensee, must, as far as is practicable comply with any reasonable request from the owner or occupier intended to limit interference with the lawful activities of the owner or occupier. | NR | 4 | √ | | | | | | | | | ✓ |
| 58 | Act Section 186 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee applies for a warrant, the application must contain the prescribed information. | 2 | 4 | | | | | √ | | | | | ~ |
| 59 | Water Services Act Section 187(1) – (3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee applies for a warrant to enter, the application must be made in accordance with the procedures specified depending on the location of the applicant and the justice. | | 4 | | | | | * | | | | | ✓ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----------|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 60 | Water Services Act Section 190(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Unless required to give a copy of the warrant, the licensee executing the warrant must produce the warrant for inspection by the occupier of the place concerned on entry (if practicable), and if requested to do so. | 2 | 4 | | | | | √ | | | | | ✓ |
| 61 | Water Services Act Section 190(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 On completing the execution of a warrant the licensee must record the prescribed information on that warrant. | 2 | 4 | | | | | ✓ | | | | | * |
| 62 | Water Services Act Section 210(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee designates a person as an inspector or compliance officer, the licensee must give that person a certificate of authority that includes certain prescribed information. | 2 | 4 | | | | | ✓ | | | | | √ |
| 63 | Water Services Act Section 218(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 In the exercise or purported exercise of a power under the Act, the licensee must ensure that, to the extent practicable, the free | NR | 4 | √ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|---|------|----------|----------|-------|--------|-------|----|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | | use of any place is not and that as little damage, harm or obstructed, inconvenience is caused as is possible. | | | | | | | | | | | | |
| 64 | Water Services Act Section 218(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee does any physical damage in the exercise of a works power or a power of entry, the licensee must ensure that the damage is made good, and pay compensation to the extent that it is not practicable to make good the damage. | 2 | 4 | √ | | | | | ✓ | | | | |
| 65 | Regulations | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee provides a water supply service in respect of a multiunit development, the licensee must, on the request of the owner or the strata company, assess whether a sub-meter is satisfactory for measuring the quantity or flow of water passing through a pipe supplying water to the unit. | 2 | 4 | | | | | ✓ | | | | | * |
| 66 | Regulations | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information. | 2 | 4 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Adı | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|---|------|----------|-----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 67 | Water Services Regulations 2013 Regulations 26(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the owner or occupier requests the licensee to test a meter and pays the charge (if any) for testing that type of meter, the licensee must test the meter in accordance with a procedure approved by the CEO for the purpose of this regulation. | 2 | 4 | | | | | ✓ | | | | | √ |
| 68 | Water Services Regulations 2013 Regulation 26(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a meter test finds that the meter is outside the prescribed tolerance applicable, the licensee must take the specified actions, bear the costs of testing and refund or credit any charges paid under regulation 26(3). | 2 | 4 | | | | | * | | | | | ✓ |
| 69 | Water Services Regulations 2013 Regulation 29(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must, on the written request of a developer who is required to pay the licensee an infrastructure contribution in respect of a subdivided lot, defer the payment of the contribution unless regulations 29(3) or 29(4) applies. | 2 | 4 | | | | | ✓ | | | | | √ |
| 70 | Water Services Regulations | WL 2: Version 10: Clause 4.1.1 | 2 | 4 | | | | | ✓ | | | | | ✓ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|-----------------------------|--|------|----------|----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | 2013 Regulation 42(2) | WL 2: Version 11: Clause 4.1.1 The written order requiring the owner or occupier of land to install a backflow prevention device must set out the date by which the device must be installed and tested (which must be at least 7 days after the day on which the order is given to the owner or occupier). | | | | | | | | | | | | |
| 71 | Regulations | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The compliance notice given by the licensee to the owner or occupier of land must specify that the backflow prevention device be tested or maintained in accordance with the standard and the date by which the testing or maintenance is required to be done (which must be at least 7 days after the day the notice is given to the owner or occupier). | 2 | 4 | | | | | * | | | | | 4 |
| 72 | Regulations | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The compliance notice requiring the owner or occupier of land to have their backflow prevention device made good as specified in the notice must include the work that is required to be done, the manner in which the work is to be done and the date by which the work is to be done (which must be at least 7 days after the day the notice is given to the owner or occupier). | | 4 | | | | | √ | | | | | * |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 73 | Not used | | | | | | | | | | | | | |
| 74 | Water Services Regulations 2013 Regulation 60(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee proposes to exercise a works power in a road and considers that it is necessary to alter the position of infrastructure, the licensee must notify the person who is responsible for the infrastructure and may request that the person make the alterations within the time specified in the notice. | 2 | 4 | | | | | * | | | | | * |
| 75 | Water Services Regulations 2013 Regulation | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee opens or breaks up the surface of a road, the licensee must complete the relevant work and reinstate and make good the road and must take all reasonable measures to prevent that part of the road from being hazardous. | 2 | 4 | 1 | | | | | | ✓ | | | |
| 76 | Water Services Regulations 2013 Regulations 65(1) | Water Services Regulations 2013 Regulations 65(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 | 2 | 4 | √ | | | | | ✓ | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratin | gs |
|-----|---|---|------|----------|----------|----------|--------|-------|----|---|------|-------|-------|----|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | Water Services Regulations 2013 Regulations 65(2) | The licensee must maintain records for all land in respect of which water service charges apply. | | | | | | | | | | | | |
| 77 | Water Services Regulations 2013 Regulations 65(2) | Water Services Regulations 2013 Regulations 65(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The records for all land in respect of which water service charges apply must contain the prescribed information. | 2 | 4 | 4 | | | | | ✓ | | | | |
| 78 | Regulations | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Unless regulation 65(5) applies, the licensee must make the records for all land in respect of which water service charges apply available for inspection by any person without charge and give a copy of particular records to a person with a material interest in them, on payment of the prescribed charge, if any, for giving a copy of the records. | 2 | 4 | | ✓ | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-------------|---|--|------|----------|----|-------|--------|-------|----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 78 A | Water Services Regulations 2013 Regulations 65(5) and 65(6) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Unless a customer gives their consent under regulation 65(6), the licensee must not make a record relating to a customer available for inspection by a person, or give a copy of a particular record relating to the customer to a person, if doing so would disclose information that the customer has requested be kept confidential because the customer believes that disclosure could increase the risk of family violence to the customer or an associated person. | 2 | 3 | ✓ | | | | | √ | | | | |
| 79 | Water Services Regulations 2013 Regulation 67 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Except as otherwise provided under the Act, the records maintained by the licensee for a period in relation to land are the basis upon which the licensee must determine the water service charges applicable for the period. | 2 | 4 | 1 | | | | | ✓ | | | | |
| 80 | Water Services Regulations 2013 Regulations 68(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must consider an objection to the records maintained by a licensee under regulation 65 as soon as practicable. | NR | 4 | | | | | * | | | | | * |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|---|------|----------|----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 81 | Water Services Regulations 2013 Regulations 68(6) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must give the person by whom the objection was made written notice of the licensee's decision on the objection together with a brief statement of the licensee's reasons for the decision. | 2 | 4 | | | | | ✓ | | | | | ✓ |
| 82 | Water Services Regulations 2013 Regulations 68(7) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee allows an objection, wholly or in part, to entries in the records maintained by a licensee under regulation 65, the licensee must advise the person who objected of any consequent amendment of the records. | 2 | 4 | | | | | * | | | | | ✓ |
| 83 | Water Services Regulations 2013 Regulations 68(8) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee disallows an objection, wholly or in part, to entries in the records maintained by a licensee under regulation 65, the licensee must advise the person of the time within which and the manner in which a review of the decision may be sought. | 2 | 4 | | | | | ✓ | | | | | √ |
| 84 | Water Services Regulations | WL 2: Version 10: Clause 4.1.1 | 2 | 4 | | | | | | | | | | |

| N- | Obligations | Licence | T | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|--|---|----------|----------|----------|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | 69(3) | WL 2: Version 11: Clause 4.1.1 Upon receipt of a notice from a person dissatisfied with a decision of the licensee on an objection, the licensee must promptly refer the relevant records to the State Administrative Tribunal for a review. | | | | | | | ✓ | | | | | ✓ |
| 85 | Water Services Regulations 2013 Regulation 70(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Upon receipt of a notice from a person dissatisfied with a decision of the licensee to refuse to extend the time for giving an objection to the licensee or a notice under regulation 69(2), the licensee must promptly refer the decision to the State Administrative Tribunal for a review. | 2 | 4 | | | | | ✓ | | | | | ✓ |
| 86 | Water Services Regulations 2013 Regulation 74(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must make any amendment of the records necessary as a consequence of an allowance, wholly or in part, of an objection under the Act or the Valuation of Land Act 1978 or as a consequence of a review by the State Administrative Tribunal. | 2 | 4 | ✓ | | | | | | | | | ✓ |
| 87 | Water Services Regulations 2013 Regulation 74(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must, if necessary, as a consequence of the amendment to the records under regulation 74(1), determine or re-determine any water service charge; and, if necessary, provide a rebate or refund. | 2 | 4 | √ | | | | | | | | | ✓ |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|--|---|------|----------|----|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 88 | Water Services Regulations 2013 Regulation 75(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a person is liable, under an agreement with the owner of land, for payment of the water service charges in respect of certain land, the person is entitled to receive from the licensee all information necessary for the person to assess his or her liability under the agreement. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 88A | Water Services Regulations 2013 Regulation 80H | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must, within 60 days after receiving a water efficiency management plan from an owner or occupier of a non- residential lot, approve the plan, request further information, or request a revised plan by written notice. | 2 | 4 | | | | | ✓ | | | | | ✓ |
| 89 | Water Services Regulations 2013 Regulation 85 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Compliance notices issued by the licensee must include a brief description of the possible consequences under the Act of not complying with the notice, and the rights of review under the Act in relation to the notice and who may apply for review. | 2 | 3 | ✓ | | | | | | | ✓ | | |
| 90 | Water Services Regulations 2013 Regulation 86(6) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee appoints an employee as an authorised or approved officer for the purposes of the Criminal Procedure Act 2004 Part 2, the licensee must issue the officer a certificate, badge or identity card identifying the officer as a person authorised to issue infringement notices. | 2 | 3 | | | | | * | | | | | ✓ |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|---|--|------|----------|----|-------|--------|-------|----|----------|----------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 91 | Water Services Regulations 2013 Regulation 86(9) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must maintain a list of persons appointed to be authorised officers or approved officers for the purposes of the Criminal Procedure Act 2004 Part 2, and must, on request, give a copy of the list to the CEO or to the chief executive officer of the Public Services principally in the administration of the assisting Criminal Procedure Act 2004. | 2 | 3 | | | | | * | | | | | √ |
| 92 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 8(1)-(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have written information for customers about the prescribed matters regarding connections and the information must be publicly available. (Note: the information required by clause 8(2)(a) applies to the Water Corporation, Bunbury Water Corporation, and Busselton Water Corporation only and the information required by clause 8(2)(g) applies only to licensees that supply potable water). | 2 | 4 | ✓ | | | | | | ✓ | | | |
| 93 | (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must ensure that, in any 12-month period, 90% of water supply service connections are completed before the end of 10 business days, starting on the day on which the customer has paid the relevant fees and complied with the relevant requirements. | 2 | 2 | ✓ | | | | | | ✓ | | | |
| 94 | Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee charges a fixed charge, the licensee must issue a bill for a fixed charge to each customer at least once in every 12-month period. | 2 | 3 | ✓ | | | | | √ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | C | ompli | iance | Rating | gs |
|-----|--|--|------|----------|----------|-------|--------|-------|----|----------|-------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 95 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee charges a quantity charge, the licensee must issue a bill for a quantity charge to each customer at least once in every 4-month period. | 2 | 2 | √ | | | | | | ✓ | | | |
| 96 | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A bill for usage must be based on a meter reading to ascertain the quality supplied or discharged. | 2 | 4 | 4 | | | | | ✓ | | | | |
| 97 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If an accurate meter reading is not possible, a bill for usage must be based on an estimate, in accordance with the prescribed regulations (if any), of the quantity of water supplied or wastewater discharged. | 2 | 4 | ✓ | | | | | √ | | | | |
| 98 | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If an accurate meter reading is not possible and there are no applicable regulations, a bill for usage must be based on a reasonable estimate of supply or discharge using one of the prescribed methods. | 2 | 4 | √ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | C | ompli | iance | Rating | gs |
|-------------|--|--|------|----------|----------|-------|--------|-------|----|----------|-------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 98 A | Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 WL2: Version 11: Clause 4.1.1 Despite subclauses 11(4) and (5), a bill for usage based on a meter reading must be issued at least once in every 12-month period. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 99 | | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must send a bill to the address of the place where the water service is provided or, if the customer nominates another address, to the nominated address. | 2 | 3 | * | | | | | ✓ | | | | |
| 100 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Each bill must contain the prescribed information. | 2 | 3 | ✓ | | | | | √ | | | | |
| 100A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A bill issued for 2 or more water services must specify the charge payable for each water service. | 2 | 3 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompli | iance | Ratinç | gs |
|------|---|---|------|----------|----------|-------|--------|-------|----|----------|----------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 101 | (Customer | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Each bill for usage for a metered water service must contain the specified information. | 2 | 3 | √ | | | | | √ | | | | |
| 101A | Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a bill for usage for a metered water service was based on an estimate, the bill must inform the customer that the licensee will tell the customer the prescribed information on request. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 102 | Not used | | | | | | | | | | | | | |
| 102A | Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Each bill must contain the prescribed information. | 2 | 3 | √ | | | | | | ✓ | | | |
| 103 | Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a bill is based on an estimate, the licensee must tell the customer on request the basis of the estimate and the reason for the estimate. | 2 | 3 | √ | | | | | ✓ | | | | |
| 104 | Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a bill is based on an estimate, the licensee must make any adjustments to the next bill to take into account the extent to | 2 | 3 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompli | iance | Rating | gs |
|------|--|---|------|----------|----------|-------|--------|-------|----|----------|-------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | Standards) 2018 Clause 14(2) | which the estimate was not reasonable having regard to a subsequent and accurate meter reading. | | | | | | | | | | | | |
| 104A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 15(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the prescribed information. | 2 | 3 | √ | | | | | * | | | | |
| 105 | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must provide to the customer on request a meter reading and a bill (or revised bill if applicable) for outstanding charges outside of the usual bill cycle, or in case the customer disputes an estimate. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 106 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 17(2) & | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have a written policy, standard or set of guidelines (available on the licensee's website and a hardcopy provided to a customer upon request at no charge) in relation to granting a discount to a customer whose meter reading indicates a water usage that is higher than normal for the customer but is likely to have been wasted because of a leak from the customer's system. | 2 | 3 | √ | | | | | ✓ | | | | |
| 107 | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee cannot recover an undercharged amount from a customer unless it is for water services provided in the 12-month period ending on the day on which the licensee informed the customer of the undercharging. | 2 | 2 | ~ | | | | | | * | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-----|--|--|------|----------|----|-------|--------|-------|----|---|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 108 | (Customer | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 109 | Water Services Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not charge interest or late payment fees on an undercharged amount. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 110 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must allow a customer to pay an undercharged amount by way of a repayment plan that has effect for the duration of the shorter of the prescribed periods starting on the day that the bill in clause 18(3) is issued. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 111 | Not used | | | | | | | | | | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|------|--|---|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must, within 15 business days of becoming aware of an overcharge, credit the overcharged amount to the customer's account or send the customer a notice informing the customer of the overcharging and recommending options for how the overcharged amount may be refunded or credited to the customer's account. | 2 | 3 | * | | | | | ✓ | | | | |
| 112 | Not used | | | | | | | | | | | | | |
| 112A | Service Standards) 2018 Clause 19(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee sends the customer an overcharging notice and receives instructions from the customer about the refunding or crediting of the overcharged amount, the licensee must refund the overcharged amount, or credit the overcharged amount to the customer's account within 15 business days of the licensee receiving the instructions. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 112B | Code of Conduct (Customer Service Standards) 2018 Clause 19(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If instructions from the customer about the refunding or crediting of the overcharged amount have not been received by the licensee at the end of the period of 10 business days starting | 2 | 3 | ✓ | | | | | ~ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | gs |
|------|--|--|------|----------|----------|-------|--------|-------|-----|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | | on the day an overcharging notice is sent, the licensee must credit the overcharged amount to the customer's account before the end of the period of the next 15 business days. | | | | | | | | | | | | |
| 112C | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must notify the customer immediately after crediting the overcharged amount to the customer's account under subclause (2)(a), (3) or (4). | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 113 | Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must review a bill on the customer's request. | 2 | 4 | ~ | | | | | | | | | * |
| 114 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The license must have a written procedure for the review of a bill on the customer's request. | 2 | 4 | ✓ | | | | | | | | | * |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | C | ompli | iance | Rating | gs |
|------|--|---|------|----------|----------|----------|--------|-------|----|---|----------|-------|--------|----|
| No | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 115 | (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The review procedure in clause 20(2) must include the specified information and be available on the licensee's website and a hardcopy provided to a customer upon request at no charge. | 2 | 4 | √ | | | | | ✓ | | | | |
| 116. | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The review procedure must state that the customer may, but does not have to, use the licensee's complaints procedure mentioned in clause 46 before or instead of applying to the water services ombudsman or, if available, making an appeal from, or applying for a review of, the decision under regulations mentioned in section 222(2)(k) of the Act. | 2 | 3 | | √ | | | | | * | | | |
| 117. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must inform the customer of the outcome of a review of the customer's bill as soon as practicable or otherwise less than 15 business days from the day the customer's request for review was received. | 2 | 3 | * | | | | | ✓ | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|----------------|--|---|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 117 A . | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must notify each of its customers of any change to the amount or rate of a water service charge in accordance with the requirements in clause 21(2). | 2 | 4 | √ | | | | | ✓ | | | | |
| 118. | Water Services Code of Conduct | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued. | 2 | 4 | ✓ | | | | | * | | | | |
| 119. | Water Services Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must allow a customer to pay a bill using any of the prescribed methods selected by the customer. | 2 | 4 | ~ | | | | | √ | | | | |
| 120. | Water Services Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 | 2 | 4 | ✓ | | | | | 1 | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|------|--|---|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | Standards) 2018 Clause 24(2) | WL 2: Version 11: Clause 4.1.1 The licensee must, when offering bill payment method options, inform the customer of the fees and charges (if any) associated with each bill payment method offered. | | | | | | | | | | | | |
| 121. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Before receiving a bill payment by direct debit the licensee must obtain the express consent of the customer or of an adult person nominated by the customer to give consent. | 2 | 4 | * | | | | | √ | | | | |
| 122. | Water Services Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must accept payment in advance from a customer on a customer's request. | 2 | 4 | ~ | | | | | ✓ | | | | |
| 123. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness. | 2 | 4 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratin | gs |
|-------|--|--|------|----------|----------|-------|--------|-------|----|----------|------|-------|-------|----|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 124 | Not used | | | | | | | | | | | | | |
| 124A. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must advise a customer who has been assessed as experiencing payment difficulties that they have a right to pay the bill under a payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer. | 2 | 3 | √ | | | | | * | | | | |
| 124B. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing payment difficulties, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods. | 2 | 3 | ✓ | | | | | * | | | | |
| | Water Services Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 2 | 3 | ✓ | | | | | √ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Ratin | gs |
|-------|--|--|------|----------|----------|-------|--------|-------|-----|---|------|-------|-------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | Clause 28(4) | The licensee must consider and decide whether or not the payment plan or other arrangement for a customer who has been assessed as experiencing payment difficulties should be interest-free, or fee-free, or both. | | | | | | | | | | | | |
| 125. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1, Clause 1.1.1 WL 2: Version 11: Clause 4.1.1, Clause 1.1.1 The licensee must have a written policy in relation to financial hardship that is approved by the ERA. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 126 | Not used | | | | | | | | | | | | | |
| 126A. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Unless the ERA approves otherwise, the licensee's financial hardship policy must comply with the ERA's guidelines (if any) in relation to financial hardship policies. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 126B. | Code of Conduct (Customer Service Standards) 2018 Clause 29(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Unless the ERA approves otherwise, amendments to the licensee's financial hardship policy must be approved by the | 2 | 4 | ✓ | | | | | ✓ | | | | |

| No. | Obligations Under Licence | Licence | Tune | Audit | Ad | equac | y of C | ontro | ols | С | ompli | iance | Rating | gs |
|-------|--|---|------|----------|----------|-------|--------|----------|-----|---|-------|-------|--------|----|
| NO. | Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | | ERA and comply with the ERA's guidelines (if any) in relation to financial hardship policies. | | | | | | | | | | | | |
| 127 | Not used | | | | | | | | | | | | | |
| 128. | Water Services Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee's financial hardship policy must be available on the licensee's website and a hardcopy provided to a customer upon request at no change. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 129 | Not used | | | | | | | <u> </u> | | | | | | |
| 129A. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must review the financial hardship policy at least once in every 5-year period. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 129B. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must review the financial hardship policy if directed to do so by the ERA. | 2 | 4 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratinç | gs |
|-------|--|--|------|----------|----------|-------|--------|-------|----|----------|----------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 129C. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must consult with relevant consumer organisations when formulating or reviewing its financial hardship policy. | 2 | 4 | √ | | | | | √ | | | | |
| 130 | Not used | | | <u> </u> | | | | - | | | | | | |
| 130A. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must advise a customer who has been assessed as experiencing financial hardship that they have a right to pay the bill under an interest-free and fee-free payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer. | 2 | 4 | * | | | | | | ✓ | | | |
| 130B. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing financial hardship, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods. | 2 | 4 | 4 | | | | | 4 | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | gs |
|-------|--|---|------|----------|----------|-------|--------|-------|-----|---|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 131 | Not used | | | | | | | | | | | | | |
| 131A. | Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must consider reducing the amount owing by the customer. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 131B. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(b) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must review, upon request, how a customer is paying a bill under clause 30(2) and (3) and revise the payment plan or arrangement if the review indicates the customer is unable to meet the obligations. | 2 | 4 | √ | | | | | ✓ | | | | |
| 131C. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(c) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must provide the specified written information to a customer. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 132 | Not used | | | | | | | | | | | | | |
| 133. | Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 31(4) & (5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have written information regarding the payment schemes and other assistance that is available to customers. The information must be available on the licensee's | 2 | 4 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | gs |
|----------------|---|---|------|----------|----------|-------|--------|-------|-----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | | website and a hardcopy provided to a customer upon request at no charge. | | | | | | | | | | | | |
| 133A. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not change interest or fees for late payment of a bill by a customer in the specified circumstances. | 2 | 3 | √ | | | | | √ | | | | |
| | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 33(1)(a)- | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not commence or continue proceedings to recover a debt from a customer if the customer is complying with a payment plan or other arrangement, is being assessed for payment difficulties or is being assessed for financial hardship. | 2 | 3 | √ | | | | | | | | | ✓ |
| 134 A . | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 33(1)(d)- (e) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not commence or continue proceedings to recover a debt from a customer if a complaint made by the customer to the licensee or water services ombudsman, which directly relates to the water service charge to which the debt relates, is not resolved by the licensee (or is not determined or is upheld by the ombudsman). | 2 | 3 | ✓ | | | | | | | | | 1 |
| 135. | Water Services Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 | 2 | 3 | ✓ | | | | | | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | js |
|----------------|--|---|------|----------|----------|-------|--------|-------|-----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | Standards) 2018 Clause 40(1) | WL 2: Version 11: Clause 4.1.1 If the licensee has cut off or reduced the rate of flow of water to land under section 95(1)(b) of the Act, the licensee must restore the supply of water if the amount owing is paid, or if the customer enters into a payment arrangement for the amount owing that is satisfactory to the licensee. | | | | | | | | * | | | | |
| 136. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has, under section 95(1)(a), (c), (d) or (e) of the Act, cut off or reduced the flow of water, the licensee must restore the supply of water if the licensee is satisfied that the reason for the disconnection or reduction no longer applies. | 2 | 3 | ✓ | | | | | | | | | ✓ |
| 137 | Not used | | | | | | | | | | | | | |
| 137 A . | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not start a water supply restriction unless the licensee has given the customer a reminder notice (that includes the information specified in clause 35), the water service charge has still not been paid in full, and the licensee has given the customer a restriction notice. | 2 | 3 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | C | ompli | ance | Rating | gs |
|----------------|--|--|------|----------|----------|-------|--------|-------|----|---|----------|------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 137B. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not give a customer a restriction notice less than 7 days before the day on which the water supply restriction is proposed to start. | 2 | 3 | √ | | | | | | ✓ | | | |
| 137C. | Water Services Code of Conduct | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The restriction notice must include the specified information. | 2 | 3 | ✓ | | | | | | 1 | | | |
| 138. | Code of Conduct (Customer Service Standards) 2018 Clause 37(1)(a)- | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not start a water supply restriction if the specified circumstances apply. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 138 A . | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not start a water supply restriction if the specified circumstances apply. | 2 | 3 | ~ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratino | gs |
|-------|---|---|------|----------|----|-------|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 138B. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not start a water supply restriction on or during the specified times. | 2 | 3 | ✓ | | | | | √ | | | | |
| 139. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not, under section 95(1)(b) or (2) of the Act, reduce the rate of flow of water to a customer to below 2.3 litres each minute. | 2 | 3 | ✓ | | | | | ✓ | | | | |
| 140. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The Water Corporation must restore a water supply to land in the metropolitan region within the specified timeframe, unless the licensee and customer expressly agree otherwise. | - | - | | | N/A | | | | | N/A | | |
| 141. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(3) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The Water Corporation must restore a water supply to land outside the metropolitan region within the specified timeframe, unless the licensee and customer expressly agree otherwise. | - | - | | | N/A | | | | | N/A | | |
| 142. | Water Services Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 | 2 | 3 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | _ | Audit | Ad | lequac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-------|---|---|------|----------|----------|--------|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | Standards) 2018 Clause 41(4) | WL 2: Version 11: Clause 4.1.1 The licensee (other than the Water Corporation) must restore a water supply to land within the specified timeframe, unless the licensee and customer expressly agree otherwise. | | | | | | | | | | | | |
| 143. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The Water Corporation must ensure that there is a 90% compliance rate with clauses 41(2) and 41(3) in any 12-month period ending on 30 June. | - | - | | | N/A | | | | | N/A | | |
| 144. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(6) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee (other than the Water Corporation) must ensure that there is a 90% compliance rate with clause 41(4) in any 12-month period ending on 30 June. | 2 | 3 | ✓ | | | | | √ | | | | |
| 144A. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption. | 2 | 3 | ✓ | | | | | √ | | | | |
| 144B. | Water Services Code of Conduct (Customer Service | WL 2: Version 10: Clause 4.1.1 | 2 | 3 | | ✓ | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | gs |
|-------|-----------------------------------|--|------|----------|----------|-------|--------|-------|-----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| | Clause 43(2) | WL 2: Version 11: Clause 4.1.1 The notice of any planned service interruption must be given within the prescribed timeframes. | | | | | | | | | | | | |
| 144C. | Water Services | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have policies, practices and procedures for dealing with and minimising the impact of a burst, leak or blockage in its water supply works or sewerage works. | 2 | 4 | * | | | | | * | | | | |
| 144D. | Water Services Code of Conduct | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The policies, practices and procedures under clause 44(1) must deal with the prescribed matters. | 2 | 4 | √ | | | | | * | | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | C | ompli | ance | Ratinç | js |
|-------|--|--|------|----------|----|-------|--------|-------|----|----------|----------|------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 144E. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 45 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must provide a 24 hour information line by means of which, at the cost of a local telephone call (excluding mobile telephones), a customer can notify the licensee of emergencies and faults, and get information about the reason for, and the expected duration of, any unplanned service interruption. | 2 | 3 | 4 | | | | | √ | | | | |
| 145. | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have a written complaints procedure in relation to investigating and dealing with complaints of customers about the provision of water services by the licensee or a failure by the licensee to provide a water service. | 2 | 4 | * | | | | | ✓ | | | | |
| 146. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's guidelines (if any). | 2 | 3 | 4 | | | | | | √ | | | |

| No | Obligations | Licence | Toma | Audit | Ad | equac | y of C | ontro | Is | С | ompl | iance | Rating | gs |
|-------|--|--|------|----------|----------|-------|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 147. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee's complaints procedure must provide for the matters specified in relation to lodgement of complaints, responding to complaints, dispute resolution arrangements and resolving complaints. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 148 | Not used | | | | | | | | | | | | | |
| 148A. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(4) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee's complaints procedure must list the procedures available to the customer under the Act as to applying to the water services ombudsman or making an appeal from, or applying for a review of, the decision that gave rise to the complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k). | 2 | 3 | * | | | | | | * | | | |
| 149. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(5) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee's complaints procedure must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge. | 2 | 4 | ✓ | | | | | √ | | | | |

| N | Obligations | Licence | . | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratinç | gs |
|-------|--|--|----------|----------|----------|-------|--------|-------|----|---|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 149A. | (Customer Service | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman. | 2 | 4 | 4 | | | | | | ✓ | | | |
| 150. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 48(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must provide a customer with the specified services on request and at no charge. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 151 | Not used | | | | | | | | | | | | | |
| 152. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 48(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must make available to each customer, at no charge, the customer's personal account information including information about bills previously issued to the customer and about the quantity of water supplied to, or wastewater discharged by, the customer in previous billing periods. | 2 | 4 | * | | | | | ✓ | | | | |
| 153. | Water Services Code of Conduct (Customer | WL 2: Version 10: Clause 4.1.1 | 2 | 4 | ✓ | | | | | | ✓ | | | |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|-------|--|--|------|----------|----------|-------|--------|-------|----|---|----------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | Service Standards) 2018 Clause 49(1) | WL 2: Version 11: Clause 4.1.1 The licensee must make the prescribed information publicly available. | | | | | | | | | | | | |
| 154. | Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 11: Clause 4.1.1 | 2 | 3 | ✓ | | | | | | * | | | |
| 154A. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must ensure that its website contains a link to the current version of this code appearing on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation. | 2 | 4 | √ | | | | | ✓ | | | | |
| 154B. | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 51(1) & | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must maintain an up-to-date preserved supply register for the purposes of Part 9 of the Code if the licensee meets the criteria in clause 51(2). The register must record the prescribed information in clause 51(3) if the criteria in clause 51(2) applies to the licensee. | 2 | 1 | | ✓ | | | | | | | | * |

| | Obligations | Licence | | Audit | Ad | equac | y of C | ontro | ols | С | ompl | iance | Rating | gs |
|-------|--|--|------|----------|----------|----------|--------|-------|-----|----------|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 154C. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not, under section 95(1)(b) of the Act, reduce the rate of flow of a supply of water to a supply address recorded on the preserved supply register. | 1 | 1 | | ✓ | | | | | | | | √ |
| 154D. | Water Services Code of Conduct (Customer Service Standards) 2018 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Despite clause 43(3), in the case of a service interruption that will affect a supply address recorded on the preserved supply register, the notice required by clause 43(1) must be sent by post or delivered to that supply address. | 2 | 1 | | ✓ | | | | | | | | • |
| 155. | Water Services Act Section 12 | WL 2: Version 10: Clause 4.2.1 WL 2: Version 11: Clause 4.2.1 The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Funding) Regulation 2014. | 2 | 4 | √ | | | | | √ | | | | |
| 156. | Not used | | | | | | | | | | | | | |
| 157. | Not used | | | | | | | | | | | | | |
| 158. | Not used | | | | | | | | | | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance | Ratinç | js |
|------|----------------------------------|---|------|----------|----------|-------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 159. | Water Services Act Section 12 | WL 2: Version 10: Clause 4.1.2 WL 2: Version 11: Clause 4.1.2 The licensee must comply with a direction from the ERA in relation to a breach of applicable legislation. | 2 | 4 | | | | | √ | | | | | √ |
| 159A | Not used | | | | | | | | | | | | | |
| 160. | Water Services Act Section 12 | WL 2: Version 10: Clause 4.6.1 WL 2: Version 11: Clause 4.6.1 The licensee and any related body corporate must maintain accounting records that comply with standards issued by the Australian Accounting Standards Board or equivalent International Accounting Standards. | 2 | 4 | ~ | | | | | ✓ | | | | |
| 161. | Water Services Act Section 12 | WL 2: Version 10: Clause 5.2.1 WL 2: Version 11: Clause 5.2.1 The licensee must comply with any individual performance standards prescribed by the ERA. | 2 | 4 | √ | | | | | ✓ | | | | |
| 162. | Water Services Act Section 12 | WL 2: Version 10: Clause 5.3.4 WL 2: Version 11: Clause 5.3.4 The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit. | 2 | 4 | ✓ | | | | | ✓ | | | | |

| No | Obligations | Licence | - | Audit | Ad | equac | y of C | ontro | ls | С | ompli | iance l | Rating | js |
|------|----------------------------------|---|----------|----------|----|-------|--------|-------|----|---|-------|---------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 163. | Water Services Act Section 12 | WL 2: Version 10: Clauses 4.7.1(a), (b), (c) WL 2: Version 11: Clauses 4.7.1(a), (b), (c) The licensee must report to the ERA, in the manner prescribed, if a licensee is under external administration or there is a change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations. | 2 | 2 | ~ | | | | | | | | | ✓ |
| 164 | Not used | | | | | | | | | | | | | |
| 165. | Water Services Act Section 12 | WL 2: Version 10: Clause 4.8.1 WL 2: Version 11: Clause 4.8.1 The licensee must provide the ERA specified information relevant to the operation of the licence or the licensing scheme, or the performance of the ERA's function under the Act in the manner and form specified by the ERA. | 2 | 4 | ~ | | | | | ✓ | | | | |
| 166 | Not used | | | | | | | | | | | | | |
| 167. | Water Services Act Section 12 | WL 2: Version 10: Clause 4.8.2 WL 2: Version 11: Clause 4.8.2 The licensee must provide the ERA with the data required for performance reporting purposes that is specified in the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework that apply to the licensee. | 2 | 4 | ✓ | | | | | ✓ | | | | |

| Na | Obligations | Licence | T | Audit | Ad | equac | y of C | ontro | ls | С | ompl | iance l | Ratinç | js |
|----------------|----------------------------------|---|------|----------|----------|-------|--------|-------|----------|---|------|---------|--------|----------|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 168. | Water Services Act Section 12 | WL 2: Version 10: Clauses 3.8.1 and 3.8.2 WL 2: Version 11: Clauses 3.8.1 and 3.8.2 Subject to clause 3.8.3, the licensee must publish within the specified timeframe any information that the ERA has directed the licensee to publish under clause 3.8.1. | 2 | 4 | | | | | √ | | | | | √ |
| 169. | Water Services Act Section 12 | WL 2: Version 10: Clause 3.7.1 WL 2: Version 11: Clause 3.7.1 Unless otherwise specified, all notices must be in writing. | 2 | 4 | √ | | | | | ✓ | | | | |
| 170 | Not used | | | | | | | | | | | | | |
| 170 A . | Water Services Act Section 12 | WL 2: Version 10: Clause 5.1.1 WL 2: Version 11: Clause 5.1.1 The licensee must notify the ERA of the details of the asset management system within five business days from the later of: a) the commencement date; or b) the completion of construction of the licensee's water service works. | 2 | - | | | N/A | | | | | N/A | | |
| 171. | Water Services Act Section 12 | WL 2: Version 10: Clause 5.1.3 WL 2: Version 11: Clause 5.1.3 The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change. | 2 | 3 | ✓ | | | | | ✓ | | | | |

| | Obligations | Licence | | Audit | Ad | lequac | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|----------------|----------------------------------|--|------|----------|----------|--------|--------|-------|----------|---|------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 172. | Water Services Act Section 12 | WL 2: Version 10: Clause 5.1.7 WL 2: Version 11: Clause 5.1.7 The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the asset management system review. | 2 | 3 | ~ | | | | | ✓ | | | | |
| 172 A . | Water Services Act Section 12 | WL 2: Version 10: Clause 6.1.1 WL 2: Version 11: Clause 6.1.1 If the ERA considers that one or more of a licensee's standard terms and conditions of service is no longer in the public interest, the ERA may direct the licensee: a) to amend: i) the standard term or condition of service; or ii) the standard term or condition of service in accordance with a term proposed by the ERA; and b) to do so within a specified period. | 2 | 4 | | | | | ~ | | | | | 1 |
| 172B. | Water Services Act Section 12 | WL 2: Version 10: Clause 6.1.2 WL 2: Version 11: Clause 6.1.2 The licensee must comply with a direction given to the licensee under clause 6.1.1. | 2 | 4 | | | | | ✓ | | | | | ✓ |
| 173 | Not used | | | | | | | | | | | | | |
| 174 175 | Not used | | | | | | | | | | | | | |
| 175 | Not used | | | | | | | | | | | | | |

| | Obligations | Licence | _ | Audit | Ad | equac | y of C | ontro | ols | С | ompli | iance | Rating | gs |
|------|----------------------------------|---|------|----------|----|-------|--------|-------|-----|---|-------|-------|--------|----------|
| No. | Under Licence Conditions | Obligation | Туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| 176 | Not used | | | | | | | | | | | | | |
| 177 | Not used | | | | | | | | | | | | | |
| 178 | Not used | | | | | | | | | | | | | |
| 179 | Not used | | | | | | | | | | | | | |
| 180 | Not used | | | | | | | | | | | | | |
| 181. | Water Services Act Section 12 | WL 2: Version 10: Clause 6.3.1 WL 2: Version 11: Clause 6.3.1 If the licensee is appointed as the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of a supplier of last resort, comply with the duties imposed by the Act and carry out its operations under or for the purpose of the last resort plan in accordance with the Act. | 2 | 4 | ✓ | | | | | | | | | √ |
| 182. | Water Services Act Section 12 | WL 2: Version 10: Clause 4.4.1(b) WL 2: Version 11: Clause 4.4.1(b) If the licensee provides a water service outside of the operating area the licensee must apply to amend the licence unless otherwise notified by the ERA. | 2 | 4 | ✓ | | | | | | | | | ✓ |
| 183 | Not used | | | | | | | | | | | | | |
| 184. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.1 WL 2: Version 11: Clause 7.1.1 Where the licensee provides potable water, the licensee must enter into a Memorandum of Understanding with the Department | NR | 4 | ✓ | | | | | ✓ | | | | |

| | Obligations No. Under Licence | Licence | _ | Audit | Ad | equac | y of C | ontro | ls | s Compliance Ratings | | | | | | | |
|-------|----------------------------------|--|------|----------|----------|-------|--------|-------|----|----------------------|---|-----|---|----|--|--|--|
| No. | Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR | | | |
| | | of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health. | | | | | | | | | | | | | | | |
| 184A. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.2 WL 2: Version 11: Clause 7.1.2 Where the licensee provides sewerage services, the licensee must, if required by the Department of Health, enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health. | NR | - | | | N/A | | | | | N/A | | | | | |
| 184B. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.3 WL 2: Version 11: Clause 7.1.3 If the licensee provides both potable water and sewerage services, the licensee must enter into a separate Memorandum of Understanding with the Department of Health in respect of each of the potable water service and sewerage service. | NR | - | N/A | | | | | N/A | | | | | | | |
| 185. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.4 WL 2: Version 11: Clause 7.1.4 A Memorandum of Understanding must comply with the specified requirements in relation to legal standing of the document and compliance audits by the Department of Health. | 2 | 4 | √ | | | | | ✓ | | | | | | | |

| | Obligations | Licence | | Audit Type Adequacy of Controls Complian | | | | Compliance Ratings | | | | | | |
|------|----------------------------------|--|------|--|---|---|---|--------------------|----------|---|---|---|---|----|
| No. | Under Licence Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR |
| 186. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.5 WL 2: Version 11: Clause 7.1.5 The licensee must comply with the terms of a Memorandum of Understanding. | 2 | 4 | ✓ | | | | | ✓ | | | | |
| 187. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.6 WL 2: Version 11: Clause 7.1.6 The licensee must publish in the form agreed with the Department of Health, a Memorandum of Understanding and any amendments to a Memorandum of Understanding within one month of signing or making the amendment. | 2 | 4 | | | | | * | | | | | ~ |
| 188. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.7 WL 2: Version 11: Clause 7.1.7 The licensee must publish the audit report on compliance with its obligations under a Memorandum of Understanding on its website within one month of the completion of the audit. | 2 | 4 | | | | | ✓ | | | | | ~ |
| 189. | Water Services Act Section 12 | WL 2: Version 10: Clause 7.1.8 WL 2: Version 11: Clause 7.1.8 The licensee must publish, in a form agreed with the Department of Health, any other reports required by the Department of Health or required by a Memorandum of Understanding on the | 2 | 4 | | | | | √ | | | | | 1 |

| | Obligations | Licence | | | | | y of C | ontro | ls | С | ompl | iance | Rating | gs |
|------|---|--|------|----------|----------|---|--------|-------|----|----------|------|-------|--------|----|
| No. | Under Licence Conditions | Obligation | туре | priority | A | В | С | D | NP | | 2 | 3 | | NR |
| | | licensee's website, at a reporting frequency specified by the Department of Health. | | | | | | | | | | | | |
| 190. | Water Services Act Section 12 | WL 2: Version 10: Schedule 2 WL 2: Version 11: Schedule 2 The licensee must comply with the standards set out in Schedule 2 of the licence. | 2 | 3 | √ | | | | | ✓ | | | | |
| 191 | Water Services Code of Practice (Family Violence) 2020 Clause 5(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have a family violence policy that sets out the matters specified in clause 5(1). | 2 | 3 | √ | | | | | ✓ | | | | |
| 192 | Water Services Code of Practice (Family Violence) 2020 Clause 5(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have a family violence policy before the end of the six-month period starting on either: 9 December 2020; or if the day of the grant of the licensee's licence is after 9 December 2020, the day of the grant of the licensee's licence. | 2 | 4 | √ | | | | | √ | | | | |
| 193 | Code of Practice | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 2 | 4 | ✓ | | | | | ✓ | | | | |

| | Obligations No. Under Licence | Licence | | Audit | Ad | equac | y of C | ontro | ls | Compliance Ratings | | | | | | |
|-----|---|---|------|----------|----------|-------|--------|-------|----|--------------------|---|-----|---|----|--|--|
| No. | Conditions | Obligation | Type | priority | A | В | С | D | NP | 1 | 2 | 3 | 4 | NR | | |
| | | A licensee must publish its family violence policy on its website and provide a hard copy of the policy to a customer on request and at no charge. | | | | | | | | | | | | | | |
| 194 | | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A licensee must review its family violence policy at least once in every 5-year period, and additionally, if directed to do so by the Minister. | 2 | 4 | ✓ | | | | | ✓ | | | | | | |
| 195 | Water Services Code of Practice (Family Violence) 2020 Clause 8(1) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A licensee must maintain adequate records in relation to compliance with this code or any policy made under the code. If the licensee is a government organisation, as defined in section 3(1) of the State Records Act 2000 (WA), then records must be maintained in accordance with its obligations under that Act. | 2 | 4 | ✓ | | | | | ✓ | | | | | | |
| 196 | Water Services Code of Practice (Family Violence) 2020 Clause 8(2) | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee is not a government organisation according to the State Records Act 2000 (WA), a record that relates to a customer, must be retained for at least 7 years after the last communication between the licensee and the customer, or water services ombudsman. If the record does not relate to a customer, then the record must be kept for at least 7 years after the record is made. | | - | | | N/A | | | | | N/A | | | | |

| No. | Obligations Under Licence | Licence | Audit Type priority | | | | | | | | | | ols Compliance Ratings | | | | | | |
|-----|---|---|------------------------|---|----------|---|---|---|----|----------|---|---|------------------------|----|--|--|--|--|--|
| NO. | Conditions | Obligation | | | A | В | С | D | NP | | 2 | 3 | | NR | | | | | |
| 197 | Water Services Code of Practice (Family Violence) 2020 Clause 9 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 When a customer affected by family violence first contacts a licensee about a particular matter relating to the family violence, the licensee must inform the customer of the existence and operation of the licensee's complaints procedure under clause 46 of the Water Services Code of Conduct (Customer Service Standards) 2018. | 2 | 4 | √ | | | | | * | | | | | | | | | |
| 198 | Water Services Code of Practice (Family Violence) 2020 Clause 10 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must ensure that its website contains a link that provides access to the current version of the code as it appears on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation. | 2 | 4 | ✓ | | | | | * | | | | | | | | | |

Table 11: Compliance and Controls Rating Scales

| | | | Compliance Rating | | | | | | | | | | |
|------------------|-------|-----|-------------------|---|---|-----|-----|-------|--|--|--|--|--|
| | | 1 | 2 | 3 | 4 | N/R | N/A | Total | | | | | |
| | A | 106 | 14 | 1 | - | 26 | - | 147 | | | | | |
| | В | 3 | 1 | - | - | 3 | - | 7 | | | | | |
| ıtings | С | - | - | - | - | - | - | - | | | | | |
| Controls Ratings | D | - | - | - | - | - | - | - | | | | | |
| Contr | N/P | - | - | - | - | 48 | - | 48 | | | | | |
| | N/A | - | - | - | - | | 45 | 45 | | | | | |
| | Total | 109 | 15 | 1 | - | 77 | 45 | 247 | | | | | |

4. Detailed Findings

Detailed below are our observations from this audit, obtained through interviews, examination of documentation, observation of processes and systems and reviewing samples of source documents and transactions to determine whether established procedures, as well as the licence obligations, had been complied with.

Ratings applied to each licence obligation have been done in accordance with the compliance and controls rating scale as prescribed in the Guidelines.

We have not included recommendations pertaining to licence obligations rated B unless they have been rated as non-compliant. These recommendations have been reported separately to the Aqwest, as required by the Audit Guidelines.

Table 12: Detailed Observations and Recommendations for the Current Audit Period

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-------|--|-------------------|--|--------------------|----------------------|
| Water | Services Act 2012 | | | | |
| 1 | Water Services Act Section 21(1)(a) WL2 Version 10: Clause 4.3.1(a) WL2 Version 11: Clause 4.3.1(a) The licensee must provide a water service authorised by the licence to persons entitled to the service under the Act, except to the extent otherwise provided for by the Act. | 2 | The following personnel were interviewed: Customer Service Coordinator Planner Scheduler The following documents were reviewed: Water Supply Connections Policy Water Service Applications Register Water and Fire Service Application Form Water Service Relocation or Disconnection Form OWR-OA-084/4 — Operating Area Map Through discussion with relevant personnel, and review of policies, procedures, and information available on Aqwest's website, we noted Aqwest provides water services to persons entitled under the Water Services Act 2012 Section 21 (1) (a). Aqwest was granted a licence to provide potable water supply services only. Aqwest has not refused to provide a water service to any entitled applicant during the audit period. Based on further enquiries, Aqwest would not reject applications unless it goes against their procedures. In such cases, Aqwest will notify the customer if anything about the application is against Aqwest's procedures and how such works can be quoted in accordance with Aqwest's policies and procedures. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |
| | | | Recommendation | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | | | Not Applicable | | |
| 2 | Water Services Act Section 21(1)(b) | 4 | The following personnel were interviewed: — Customer Service Coordinator | A | NR |
| | WL 2: Version 10: Clause 4.3.1(b) | | The following documents were reviewed: — Water Licence Map – Aqwest – ERA Map | | |
| | WL 2: Version 11: Clause 4.3.1(b) | | — OWR-OA-084/4 — Operating Area Map | | |
| | The licensee must if requested, offer to provide the water service authorised by the licence to any other person (not covered by section 21(1)(a) of the Act) within the operating area of the licence on reasonable terms, unless provision of the service is not financially viable or is otherwise not practicable. | | Through enquiries, we noted that Aqwest would provide water services to persons not covered by section 21 (1) (a), who are within the operating area of the licence. However, there were no applications for water services by persons not covered by Section 21(1)(a) of the Act. There were no activities during the audit period. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 3 | Water Services Act Section 21(1)(c) WL 2: Version 10: Clause | 4 | The following personnel were interviewed: — Manager Asset Lifecycle The following documents were reviewed: | A | 1 |
| | 4.1.1 WL 2: Version 11: Clause 4.1.1 | | Aqwest Sample Strategic Asset Management Plan PCY208 – Identification of Engineering Assets Plan Asset Maintenance Framework | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | The licensee must provide, operate, and maintain the water service works specified by the ERA in the licence for the purposes of section 11(3). | | Through enquiries and assessment of Aqwest's Strategic asset Management Plan, we observed that Aqwest has systems, policies, and processes in place to ensure that they continue to provide, operate and maintain water service works specified by the Authority in accordance with the licence requirements. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 4 | Water Services Act Section 22 WL 2: Version 10: Clause 4.4.1(a) WL 2: Version 11: Clause 4.4.1(a) The licensee must notify the ERA as soon as practicable before commencing to provide the water service outside of the operating area of the licence. | 4 | The following personnel were interviewed: Manager Asset Lifecycle Senior Asset Engineer Project Administrator Asset Delivery Coordinator The following documents were reviewed: Water Licence Map Operating and Existing Service Area Through discussions with the relevant personnel, it was identified that the current water supply region by Aqwest does not extend close to the operating licence area. Aqwest's current water supply assets extend from Dalyellup to North Bunbury. The Operating Licence Area extends from Myalup and Harvey in the North and South to Capel which is evident on Aqwest's Water Licence Map. Based on discussions, Aqwest has not provided water service outside the area of licence and will not require to provide water service outside the area of licence. | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | | | Recommendation Not Applicable | | |
| 5 | Water Services Act Section 23 | 4 | The following personnel were interviewed: — Manager Asset Lifecycle | A | 1 |
| | WL 2: Version 10: Clause 4.5.1 | | Through discussion with the relevant manager, it was identified that only Section 23 (1) (a) of the <i>Water Services Act 2012</i> is applicable to Aqwest. | | |
| | WL 2: Version 11: Clause 4.5.1 | | It was revealed that all water service works used by Aqwest are held by Aqwest. There is therefore no reason for Aqwest to enter into any agreements with another party. | | |
| | All water service works used by the licensee in the provision of a water service must be held by the licensee or must be covered by a works holding arrangement. | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 6 | Water Services Act Sections 24(1)(a) & 24(2) | 4 | The following personnel were interviewed: — Manager Asset Lifecycle | A | 1 |
| | WL 2: Version 10: Clause 5.1.1 | | The following documents were reviewed: — Aqwest Strategic Asset Management Plan Final | | |
| | WL 2: Version 11: Clause 5.1.1 | | Asset Management System Review Report - 2021 | | |
| | The licensee must provide for an asset management system in respect of the | | Aqwest uses Civica's Authority as its Asset Management System which was last reviewed 21 December 2021. The system has been unchanged during the audit period and no findings were identified during the most recent review. This was outlined in the review completed by the independent expert. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | licensee's water service works. | | Aqwest's Strategic Asset Management Plan Final contains objectives surrounding systemised asset management practises and ISO55001 certification of the asset management system. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 7 | Not used | - | - | - | - |
| 8 | Water Services Act Section 24(1)(c) WL 2: Version 10: Clause 5.1.4 WL 2: Version 11: Clause 5.1.4 A licensee must provide the ERA with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA. | 4 | The following personnel were interviewed: Manager Asset Lifecycle Risk & Compliance Co-ordinator The following documents were reviewed: Asset Management System Review Report – 2021 Cardno Limited conducted a review of Aqwest's asset management system which was finalised on 21 December 2021, within the 24-month timeframe stated in the obligation. The report was prepared for the ERAWA. No findings or recommendations were noted in the report. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 9 | Water Services Act Section 25 WL 2: Version 10: Clause 5.3.1 WL 2: Version 11: Clause 5.3.1 A licensee must, not less than once every 24 months, or such longer period as determined by the ERA, provide the ERA with an operational audit conducted by an independent expert appointed by the ERA. | 4 | The following personnel were interviewed: Risk & Compliance Co-ordinator The following documents were reviewed: Promapp: Manage Regulator Audits & Asset Management Reviews Conducted by an Independent Expert V3.0 Bunbury Water Corporation (trading as Aqwest) Water Services Licence 2020 Operational Audit Aqwest has a Promapp flowchart in place which outlines the process for running an audit including budgeting, preparing internal stakeholders, payment of services and responding to findings. We confirmed that the previous operational audit was finalised in February 2021 and covered the period of 1 October 2017 to 30 September 2020. The 2020 Operational Audit was conducted as prescribed and published on the ERA's website. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 10 | Water Services Act Section 26(3) WL 2: Version 10: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — ERA's Water Compliance Reporting Manual: Obligations 191 to 198 | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 The licensee must comply with each code of practice made by the Minister to the extent to which it applies to the licensee. | | On 9 December 2020, the Minister made a Code of Practice – the Code of Practice (Family Violence) - applicable to Aqwest. The Code is listed as Obligation 191 to 198 in the ERA's Water Compliance Reporting Manual. Compliance with these obligations is tested under those licence obligations accordingly. Please refer to Obligations 191 and 197 for details. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | | |
| 11 | Not used | - | - | - | - |
| 12 | Not used | - | - | - | - |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 13 | Water Services Act Section 36 | 4 | The following personnel were interviewed: — Manager Asset Lifecycle | A | NR |
| | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee ceases to provide a water service in an area, the licensee must ensure that the water service works are left in a safe condition and must not remove any part of the works except with the approval of the Minister. | | The following documents were reviewed: — Project Management Plan Template — Discussions with relevant manager Aqwest's Project Management Plan Template describes the requirement of approval from the Minister for Water in order to cease to provide water services to an area. Within the template it is described that this approval type is not required, and its status is not applicable. Further discussions with the relevant manager revealed that there was no requirement by Aqwest to cease water services to an area. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 14 | Water Services Act Section 60 WL 2: Version 10: Clause 6.3.1 WL 2: Version 11: Clause 6.3.1 If the licensee is the supplier of last resort for a designated area in relation | 4 | The following personnel were interviewed: General Manager Water Services The following documents were reviewed: Promapp for Change Management Process Through discussions, Aqwest was not the supplier of last resort during the audit period, and it would be very unlikely for Aqwest to be appointed as the supplier of last resort. However, Aqwest has processes in place to address this requirement through their business continuity and change management processes. The licensee had no activity for this obligation for the period. | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | to the provision of a particular water service, the licensee must perform the functions of the supplier of last resort and must comply with the relevant duties and carry out the relevant operations prescribed. | | Recommendation Not Applicable | | |
| 15 | Water Services Act Section 70(2) WL 2: Version 10: Clause 6.2.1 WL 2: Version 11: Clause 6.2.1 The licensee must not supply water services to customers unless the licensee: — is a member of the water services ombudsman scheme; and — is bound by the scheme; and | 2 | We interviewed the following personnel: General Manager Business Services The following documents were reviewed: Aqwest – annual member report 2020-21 Aqwest – annual member report 2021-22 Aqwest – annual member report 2022-23 EWOWA annual report 2019-20 EWOWA annual report 2020-21 EWOWA annual report 2021-22 We checked the Register of Members published on the Energy and Water Ombudsman Western Australia (EWOWA) website to confirm that Aqwest is a member of the Water Services Ombudsman Scheme. Review of the EWOWA Annual Reports, indicated that there were no binding decisions or directions from the EWOWA in the reporting period. | A | 1 |
| | will comply with any decision or direction of the water services ombudsman under the | | We checked the published 2022–23 EWOWA Annual Report and confirmed that Aqwest is listed as one of the Water Industry Members – 30 June 2023. Furthermore, we also reviewed the Aqwest Energy and Water Ombudsman | | |
| | scheme. | | Member Reports further describing Aqwest's membership. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 16 | Water Services Act Section 77(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for. | 3 | The following personnel were interviewed: Coordinator Networks The following documents were reviewed: Promapp: Action unplanned Maintenance Works Promapp: Respond to Fault after Hours Contracted Service Delivery 1 Discoloured Water Contracted Service Delivery 2 Pressure Complaints Contracted Service Delivery 4 Service Maintenance Contracted Service Delivery 5 Water Main Repair Contracted Service Delivery 6 Faulty Stopcock Contracted Service Delivery 15 Water Meter Replacement Contracted Service Delivery 193 Investigations Customer Notice – Attended Customer Property Aqwest has two process maps for actioning unplanned interruptions of water services. It was noted that there is one during business hours and the other after hours. Specific procedures on how to address various types of water service interruptions are documented. The processes and procedures describe the reasonable actions needed to minimise the extent and duration of water service interruptions. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 17 | Not used | - | - | - | - |
| 18 | Water Services Act Section 84(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has given a notice under section 83(3)(a) of the Act, and the licensee is satisfied that the person given the notice is not going to comply with the notice within a reasonable time, the licensee must give the person 21 days' notice of its intention to commence the works. | 3 | The following personnel were interviewed: Manager Asset Lifecycle The following documents were reviewed: Promapp: Customer Notifications v10.0 Project Control Template Through discussions, it was identified that there were no instances during the audit period in which a person given a notice was not going to comply with the notice. Aqwest has controls in place through the Customer Notifications process map, that requires notifications to be sent to relevant parties at least 3 weeks (21 days) before commencing works. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Complianc Rating |
|-----|---|-------------------|--|--------------------|---------------------|
| 19 | Water Services Act Section 87(2) | 3 | The following personnel were interviewed: — Manager Asset Lifecycle | A | NR |
| | WL 2: Version 10: Clause 4.1.1 | | The following documents were reviewed: — Promapp: Respond to Ombudsman and SAT Complaints | | |
| | WL 2: Version 11: Clause 4.1.1 If a person makes an application with the State Administrative Tribunal for a review of a decision in respect of the licensee providing additional water services when a person has not responded to the licensee's notice, the licensee cannot provide the works until the application has been finally dealt with, except in limited circumstances. | | Aqwest's Respond to Ombudsman and SAT Complaints Promapp was assessed including the relevant information about application with the State Administrative Tribunal regarding providing additional water services. Through discussions with management, it was revealed that SAT process is handled by the complaints officer and no activity had taken place during the audit period. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 20 | Water Services Act Section 90(7) WL 2: Version 10: Clause 4.1.1 | 5 | The following personnel were interviewed: — Manager Asset Lifecycle — Risk & Compliance Co-ordinator The following documents were reviewed: — Identify, Report, Investigate Offences under Water Service Act 2012 Process Map | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 If the licensee gives a compliance notice to a person who is undertaking construction or carrying out similar works in the vicinity of water service works, the licensee must, to the extent practicable, consult with the owner of the land on which the obstruction is located or the activity is taking place if the person to be given the notice is not the owner of the land. | | Through discussion with relevant personnel, it was identified that no activities occurred during the reporting period that warranted issuing a compliance notice. If a compliance notice was to be issued it would be included in the project management plan for the related project. The <i>Identify, Report, Investigate Offences under Water Service Act 2012 Process Map</i> is used for managing instances of non-compliance. There is reference of the requirement of issuing compliance notices in some instances. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 21 | Water Services Act Section 95(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that. | 1 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Disconnect Existing Service Disconnections Register Water Service Relocation or Disconnection Application Form Aqwest's website: https://aqwest.com.au/building,-developing,-renovating/service-connections Through discussions and review of the disconnection process and Aqwest's webpage on disconnections, if a customer wants to disconnect water services, | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | | | they must fill and submit the <i>Water Service Relocation or Disconnection Applicant</i> form. Subsequently, Aqwest will review the application and provide the customer a quote according to the fees and charges for disconnections. Once paid in full, Aqwest will complete the work within 10 business days or on an agreed date. | | |
| | | | We reviewed the disconnections register and note that there were 9 disconnection applications during the audit period, out of which, 4 were completed and the others pending. We selected the 4 completed disconnections and tested if the customer agreed to disconnect and note that the customers agreed to disconnect by way of signing the disconnection form. | | |
| | | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| 22 | Water Services Act Section 96(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee provides water supply reticulation works, or enters into an agreement for the provision of water supply reticulation works, the licensee must install fire hydrants attached to those install works in accordance with the requirements of FESA, or the relevant local government as to the location and type of hydrant. | 4 | The following personnel were interviewed: Manager Asset Lifecycle The following documents were reviewed: MOU Between Department of Fire and Emergency Services (DFES) and Aqwest Aqwest has entered into an agreement for the provision of water supply reticulation works that include the installation of fire hydrants in accordance with the requirements of DFES, or the relevant local government, as to location and type of hydrant (according to whose district the works are provided in). The water supply reticulation works and hydrants are installed in accordance with: DFES Standard for Hydrant Installation Aqwest Water Reticulation Specification The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 23 | Water Services Act Section 96(5) WL 2: Version 10: Clause 4.1.1 | 4 | The following personnel were interviewed: — Planner Scheduler The following documents were reviewed: — DFES Request Spreadsheet 2021-2023 — Memorandum of Understanding (MoU) between DFES and Aqwest | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 The licensee must comply with requests made by FESA or a local government under sections 96(3) and 96(4) of the Act to the extent practicable and within a reasonable time. | | Through discussions with the relevant personnel, we identified that Aqwest receives requests from DFES mainly for hydrant maintenance work orders. These requests, along with the DFES work request number, are recorded in the DFES Request Spreadsheet 2021-2023 and the progress tracked. Once a request is received from DFES, the Records Administrator forwards the request to Aqwest's Planning Team, who then identifies the responsible unit and assigns the request to them to attend. These requests are usually directed to the Assets Team and is attended by an Asset Engineer. The Asset Engineer attends the request and marks the request as closed after completion of the work. Through examination of the spreadsheet and corresponding email communication of task completion, we were able to ascertain that Aqwest addresses the work requests by DFES. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 24 | Not used | - | - | - | - |
| 25 | Not used | - | - | - | - |
| 26 | Not used | - | - | - | - |
| 27 | Not used | - | - | - | - |
| 28 | Water Services Act Section 119(2) WL 2: Version 10: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator — General Manager Water Services The following documents were reviewed: — Promapp: Breach of Watering Roster | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 119(1). | | Promapp: Inadequate Access to Water Meter Aqwest indicated that currently there are no "Compliance Officers", hence, compliance notices are currently not issued. Through discussions with the relevant personnel, we noted that there have been no compliance notices issued during the audit period. If the need arises, Aqwest will issue compliance notices like other processes in place to issue notices. The licensee had no activity for this obligation for the period. Recommendation | | |
| 29 | Water Services Act Section 122(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a person makes an application to the State Administrative Tribunal under section 122(1), the licensee cannot take, or | 4 | The following personnel were interviewed: Customer Service Coordinator General Manager Water Services Business Services Administrator The following documents were reviewed: Promapp: Respond to Ombudsman and SAT Complaints Through discussions, Aqwest indicated that there were no activities under this obligation during the audit period. Aqwest's Promapp process Respond to Ombudsman and SAT Complaints has procedures in place to deal with SAT Complaints. Step 5.0 (a) of the process mentions to advise the customer and relevant work area that no other action can | A | NR |
| | continue to take, action against the person except in the circumstances specified. | | be taken. The following processes (5.0 (b)) states to investigate the complaint and (c) states to respond to the customer and SAT. The licensee had no activity for this obligation for the period. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | Recommendations Not Applicable | | |
| 30 | Water Services Act Section 125(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee provides a water supply, sewerage or drainage service to 2 or more dwellings on land by a single property connection, the licensee may apportion fees. The licensee cannot apportion fees to the extent inconsistent with any agreement related to such a provision of services, or section 66 of the Strata Titles Act 1985. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Water Supply Connections Policy Promapp: Issue Cycle Read Accounts Through discussions, Aqwest indicated that the only time fees are apportioned is in instances where a new subdivision is created. In such instances, Aqwest would apportion the bill accordingly (50% if halfway through the year and so on). Aqwest also indicated that there were no such instances where fees were apportioned for two or more dwellings on land by a single connection. The licensee had no activity for this obligation for the period. Recommendations Not Applicable | A | NR |
| 31 | Water Services Act Section 128(4) | 3 | The following personnel were interviewed: — Management Accountant The following documents were reviewed: | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with the Registrar along with the prescribed fee (if any) if the charge or contribution has been paid. | | Aqwest indicated that they have never lodged a memorial in the past and they do not anticipate the need to lodge a memorial in the future. Hence, there were no activities during the audit period. However, if Aqwest decides to lodge a memorial in the future, it is appropriate to develop relevant procedures and policies. The licensee had no activity for this obligation for the period. Recommendations Not Applicable | | |
| 32 | Water Services Act Section 129(5) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a routine inspection or maintenance is likely to cause disruption to the occupants of a place at least 48 hours' notice of a proposed entry must be given to the occupier of the | 3 | The following personnel were interviewed: Customer Service Coordinator Coordinator Networks The following documents were reviewed: Promapp: Customer Notifications Planned Outage Register Sample Notices Aqwest maintains a Planned Outage Register which includes the locations and addresses where planned works are to be performed. The register also includes the notice periods. We tested a sample of 10 such planned works and checked if service interruption notices were given to the customers and given at least 48 hours prior to the service interruption. | Α | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | place unless the occupier agrees otherwise. | | Aqwest uses a template card called <i>Water Interruption Card</i> which includes the details of the service interruption such as the affected area, the planned outage date and other information to customers on what actions to take. At the bottom of the card is the date that Aqwest indicates the day on which the notice is given. We further enquired how we can establish in fact if these notices were delivered on that date. Although the notice dates on the notices are within the 48 hours timeframe, there is no further evidence to support that the notice was delivered to the customer on that date. As such, it was concluded that date of notice given was 48 hours. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 33 | Water Services Act Section 139(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee removes or erects a fence or gate when exercising a works power conferred by the Act, the licensee must take all | 4 | The following personnel were interviewed: Manager Asset Lifecycle Coordinator Networks The following documents were reviewed: Promapp: Customer Notifications v11.0 Promapp: Planning Process for Scheduled Work Orders v4.0 Through discussions with the relevant managers, it was identified that no instances in which a fence or gate was removed or erected occurred during the audit period. Exercising works power that could impact gates or fencing are overcome by what is known as "plunking." This involves relocating the piping under a fence for works to be continued which doesn't disrupt the gate or fencing. | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | reasonable steps to notify the owner before doing so. | | Further discussion revealed that if there was the need to remove a gate or fencing, these actions will be included in the project plan which is developed prior to commencing the actual works. Further process maps were provided which outline reasonable steps needing to be taken to notify customers of any works. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 34 | Water Services Act Section 141(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A person authorised by the licensee may enter a road and exercise a works power of the licensee without consent, notice or warrant unless the exercise of the power involves opening or breaking up the surface of the road, or would cause a major obstruction of the road or | 3 | The following personnel were interviewed: Manager Asset Lifecycle Coordinator Networks The following documents were reviewed: Promapp: Plan & Coordinate Construction Works Project Control Template Works on Roads Traffic Management Plan Generic Traffic Management Plan Through discussion with Manager Asset Lifecycle and Coordinator Networks, we confirmed that activities are planned one week in advance. In addition, works are avoided during school periods to minimise disruptions. We observed that Notification of Roadworks template is present in the Generic Traffic Management Plan, containing a 24/48 hours' notice requirement. Sample testings did not yield any exceptions. The licensee was compliant with this obligation throughout the reporting period. | В | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | disruption of the traffic, in which case the licensee must give at least 48 hours' notice to the public authority that has control or management of the road. | | Recommendation Not applicable | | |
| 35 | Water Services Act Section 142 | 4 | The following personnel were interviewed: — Manager Asset Lifecycle | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must comply with sections 143 and 144 of the Act in relation to the proposed major works and has given any notice required by section 148. | | Through discussions, we identified that there was no major works conducted during the audit period. There is currently no policy or process in place surrounding the actioning of major works. If works of this nature were to be conducted in the future, the actions would be incorporated into the project plan and a new process map may need to be developed. No further testing was conducted. The licensee had no activity for this obligation for the period. Recommendations Not Applicable | | |
| 36 | Water Services Act Section 143 (2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 4 | | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|----------------------------------|--------------------|----------------------|
| | Before the licensee submits a proposal for the provision of major works to the Minister, the licensee must prepare, publish and make available plans and details of those major works as specified. | | | | |
| 37 | Water Services Act 2012 Section 143 (3) | 4 | | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 | | | | |
| | WL 2: Version 11: Clause 4.1.1 | | | | |
| | The licensee must, within 5 days of publishing the plans and details on the licensee's website, give notice setting out the matters prescribed in section 143(4) to the persons and agencies specified. | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| 38 | Water Services Act 2012 Section 144 (3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have regard to an objection or submission lodged within the relevant period. | 4 | The following personnel were interviewed: — Manager Asset Lifecycle Through discussions, we identified that there was no major works conducted during the audit period. There is currently no policy or process in place surrounding objections or alterations to major works. If works of this nature were to be conducted in the future, the actions would be incorporated into the project plan and a new process map may need to be developed. The licensee had no activity for this obligation for the period. | NP | NR |
| 39 | Water Services Act 2012 Section 145 (2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee makes alterations to the plans or details referred to in section 143(2), the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations. | 3 | Recommendation Not Applicable | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| 40 | Water Services Act 2012 Section 147(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must comply with a direction given by a Minister in respect of a proposal to provide water service works that are major works under section 143(3). | 4 | The following personnel were interviewed: — Manager Asset Lifecycle Through discussions, we identified that there was no major works conducted during the audit period. There is currently no policy or process in place surrounding the actioning of major works. If works of this nature were to be conducted in the future, the actions would be incorporated into the project plan and a new process map may need to be developed. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 41 | Water Services Act 2012 Section 147 (4) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the Minister gives a direction that further notices in relation to the proposed major works be given under section 143(3), | 4 | | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 42 | Water Services Act Section 151(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A licensee proposing to provide water service works that are general works must prepare plans and details of the proposed works and publish and make them available for inspection. | 3 | The following personnel were interviewed: Manager Asset Lifecycle Through discussions, we identified that there was no general works conducted during the audit period. There is currently no policy or process in place surrounding the actioning of major works. If works of this nature were to be conducted in the future, the actions would be incorporated into the project plan and a new process map may need to be developed. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 43 | Water Services Act Section 151 (2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must give a notice of general works setting out the matters referred to in section 151(3) | 3 | | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | to the persons and agencies specified. | | | | |
| 44 | Water Services Act Section 152(3) | 3 | | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 | | | | |
| | WL 2: Version 11: Clause 4.1.1 | | | | |
| | The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2). | | | | |
| 45 | Water Services Act Section 153(3) | 4 | The following personnel were interviewed: — Manager Asset Lifecycle | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 | | Through discussions, we identified that there was no general works conducted during the audit period. There is currently no policy or process in place | | |
| | WL 2: Version 11: Clause 4.1.1 | | surrounding alterations to major works. If works of this nature were to be conducted in the future, the actions would be incorporated into the project plan and a new process map may need to be | | |
| | If the licensee makes alteration to those plans or | | developed. | | |
| | details referred to in section 151, the licensee must give | | The licensee had no activity for this obligation for the period. | | |
| | written notice of the alterations to any person | | Recommendation Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|---------------------|--|--------------------|----------------------|
| | who is likely to be adversely affected by those alterations. | | | | |
| 46 | Water Services Act Section 166(5) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 On being advised by the Minister that an interest in land is appropriate to the licensee's needs, the licensee is required to acquire the interest. | 4 | The following personnel were interviewed: — Management Accountant Through discussions with the Management Accountant, we identified that Aqwest has never had an interest in land. Hence, Aqwest had no activity during the audit period with regards to these obligations. No documents were available for review. The licensee had no activity for this obligation for the period. Recommendation Not Applicable. | NP | NR |
| 47 | Water Services Act Section 166(6) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Any costs incurred in taking an interest in land are to be paid by the licensee. | use use aking | NP | NR | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| 48 | Water Services Act Section 170 | 4 | The following personnel were interviewed: — Management Accountant | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 | | Through discussions with the Management Accountant, we identified that Aqwest had not sold and does not anticipate that Aqwest will ever sell an | | |
| | WL 2: Version 11: Clause 4.1.1 | | interest in land under the requirements of this obligation. Hence, Aqwest had no activity during the audit period with regards to this obligation. | | |
| | The licensee must not sell an interest in land if the purchaser would hold a parcel of land that did not comply with the minimum lot size and zoning requirements under the Planning and Development Act 2005, unless the Minister permits the licensee to do so. | the the the id a id not imum The licensee had no activity for this obligation for the period. Recommendation Not Applicable the opment | The licensee had no activity for this obligation for the period. Recommendation | | |
| 49 | Water Services Act Section 173 (4) WL 2: Version 10: Clause | 3 | The following personnel were interviewed: — Customer Service Coordinator — Coordinator Networks | A | NR |
| | 4.1.1 | | The following documents were reviewed: | | |
| | WL 2: Version 11: Clause | | Promapp: Customer Notifications | | |
| | 4.1.1 | | Customer Notice – Attended Customer Property Notification of Works Cond Township | | |
| | In relation to entry to a place for the purposes of | | Notification of Works Card Template Water Supply Interruption Card Template | | |
| | doing works, in the | | Through discussions, Aqwest indicated that their staff are instructed not to enter | | |
| | circumstances specified the | | any properties unless requested by the customer. Almost all work that need to | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | licensee is required to give 48 hours' notice of proposed entry place to the occupier or owner, as applicable, unless the occupier or owner agrees otherwise. | | be done would be outside the boundaries of the property as water meters are placed outside of the property which gives Aqwest staff access to the meters. We reviewed the Customer Notifications process and found that this requirement has been documented. If a customer is refusing access, then the matter is escalated to the supervisor and a warrant would need to be obtained to enter the premises. As such, Aqwest indicated that there were no such instances where staff had to enter any premises during the audit period. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 50 | Water Services Act Section 174(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry, including (if applicable) any work proposed to be carried out. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Customer Notifications Customer Notice – Attended Customer Property Notification of Works Card Template Water Supply Interruption Card Template Since there were no activities in this regard, we checked if Aqwest had procedures in place to address any such request to enter properties. We found that Aqwest has notice templates that include the purpose of the visit and the type of work that is to be carried out. | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | | | The licensee had no activity for this obligation for the period. | | |
| | | | Recommendation Not Applicable | | |
| 51 | Water Services Act Section 174(3) | 3 | The following personnel were interviewed: — Customer Service Coordinator | A | NR |
| | WL 2: Version 10: Clause 4.1.1 | | The following documents were reviewed: — Promapp: Customer Notifications | | |
| | WL 2: Version 11: Clause 4.1.1 | | Customer Notice – Attended Customer Property Notification of Works Card Template Water Supply Interruption Card Template | | |
| | Even if in a particular instance the licensee may enter a place under the Act without having to give notice of proposed entry, the licensee must when practicable, and when it will | | Since there were no activities in this regard, we checked if Aqwest had procedures in place to address any such request to enter properties. We found that Aqwest has procedures in place to comply with this requirement by using the notice templates that include the purpose of the visit and the type of work that is to be carried out. | | |
| | not compromise the reason for entry, give notice of entry to the occupier. | | The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 52 | Water Services Act Section 175(2) | 2 | The following personnel were interviewed: — Customer Service Coordinator | A | NR |
| | WL 2: Version 10: Clause 4.1.1 | | The following documents were reviewed: — Promapp: Customer Notifications — Promapp: Manage Staff Identification Cards | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 If an occupier is present when the licensee proposes to enter a dwelling, the licensee must perform the prescribed actions before entering the premises. | | Example of Identification Card Customer Notice – Attended Customer Property Notification of Works Card Template Water Supply Interruption Card Template Since there were no activities in this regard, we checked if Aqwest had procedures in place to address any such situations where an occupier is present when entering the property. We noted that Aqwest's procedures cover the requirements of the prescribed actions and requires Aqwest staff to wear photographic identification cards that identify who they are. Staff are also required to state their intention and type of work that is to be performed. If a warrant is needed, staff would escalate the matter to their supervisor to obtain an entry warrant. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 53 | Water Services Act Section 175(5) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee enters a dwelling that is unoccupied, the licensee must leave a notice, which includes the | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Customer Notifications Promapp: Manage Staff Identification Cards Example of Identification Card Customer Notice – Attended Customer Property Notification of Works Card Template Water Supply Interruption Card Template Aqwest has an existing process map and a Customer Notifications Process | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | prescribed information, or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling. | | document (v10). As per Section 8.0 'Entry to a Premise' of this document, the guidelines reflect the following: a. Ensure you have a valid Aqwest issued Identification Card. If you are unsure, consult your supervisor before access to any property. b. Before entry, attempt to contact the resident to ensure they are aware of your entry and works to be conducted. c. If property is unattended, process to access asset if safe to do so. d. If unsafe and permitting, consider re-scheduling job and contacting the customer prior to requiring access to organise access. The licensee had no activity for this obligation for the period. Recommendation | | |
| 54 | Water Services Act Section 176(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee has entered a place with or without consent, the licensee must leave the premises as soon as practicable after being notified that the owner or | 4 | Not Applicable The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Customer Notifications Customer Notice – Attended Customer Property Through discussions, Aqwest indicated that there are no such instances as staff do not enter properties. Also, with reference to Section 9 of the Customer Notifications Process v10, item a emphasised that: If the customer is refusing access, do not attempt to access property, inform supervisor/line manager as an entry warrant will now be required before access to property. | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | occupier has refused or withdrawn their consent. | | The reference document did not specify this clause 'the licensee must leave the premises as soon as practicable'. The licensee had no activity for this obligation for the period. Recommendation Update the process document include specific clause required by obligation 55. | | |
| 55 | Water Services Act Section 176(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so. | 4 | The following personnel were interviewed: Customer Service Coordinator People & Culture Coordinator Coordinator Networks The following documents were reviewed: Example of Identification Card – Aqwest Promapp: Customer Notifications Promapp: Manage Staff Identification Cards Through discussions with the relevant personnel and review of Aqwest Customer Notifications Process procedure document (v10) particularly Section 8.0 which states that 'Requirements for entry – Aqwest employees and contracts that may be required to access a premise for the purpose of works or inspection to an Aqwest asset MUST have a valid identification card. Aqwest indicated that since their employees do not enter premises, there were no such instances where they were asked to produce their evidence of authority. The licensee had no activity for this obligation for the period. | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|----------------------------------|--------------------|----------------------|
| | | | Recommendation Not Applicable | | |
| 56 | Water Services Act Section 176(4) | 4 | | A | NR |
| | WL 2: Version 10: Clause 4.1.1 | | | | |
| | WL 2: Version 11: Clause 4.1.1 | | | | |
| | If the licensee enters or proposes to enter a place, | | | | |
| | and the owner or occupier requests the licensee | | | | |
| | produce evidence of | | | | |
| | authority for that entry, then the licensee must leave the | | | | |
| | place if they are unable to | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | do so unless the owner or occupier agrees otherwise. | | | | |
| 57 | Water Services Act Section 181 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee, or a person assisting the licensee, must, as far as is practicable comply with any reasonable request from the owner or occupier intended to limit interference with the lawful activities of the owner or occupier. | 4 | The following personnel were interviewed: Coordinator Networks The following documents were reviewed: Promapp: Planning Process for Scheduled Work Orders 20mm Long Service with Scoping Doc 100mm Fire Service Long Version with Scoping Doc Relocate 20mm greater than 1m Short with Scoping Doc Aqwest prepares a scoping document for works which include the type of work, duration, any service interruptions, and such details. Through discussions, Aqwest indicated that through the work scoping, they plan on minimising any interference with customers to the best extent possible. We reviewed three scoping documents for three different types of works and found that details pertaining to the work and the work being planned out to reasonably minimise interferences with customers lawful activities. While there are no issues identified and as this is not something that can be easily assessed, Aqwest may benefit from keeping staff continuously made aware of this through training sessions. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | A | NR |
| 58 | Water Services Act Section 186 | 4 | The following personnel were interviewed: — Customer Service Coordinator | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 59 | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee applies for a warrant, the application must contain the prescribed information. Water Services Act Section 187(1) – (3) | 4 | — General Manager Water Services Through discussions with the relevant personnel, we identified that Aqwest has never submitted an applicant for a warrant. Hence, there are no activities in this regard during the audit period for these interrelated obligations. We enquired further to see if there were any procedures in place that would cover the instance where Aqwest had to apply for a warrant. We noted that Aqwest does not have any procedures to accommodate such an instance. As such, Aqwest has concluded that the occurrence of this happening is minimal and as such there is no need to develop procedures and policies a warrant. The licensee had no activity for this obligation for the period. Recommendations | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee applies for a warrant to enter, the application must be made in accordance with the procedures specified depending on the location of the applicant and the justice. | | Not Applicable | | |
| 60 | Water Services Act Section 190(4) | 4 | | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|----------------------------------|--------------------|----------------------|
| | WL 2: Version 10: Clause 4.1.1 | | | | |
| | WL 2: Version 11: Clause 4.1.1 | | | | |
| | Unless required to give a copy of the warrant, the licensee executing the warrant must produce the warrant for inspection by the occupier of the place concerned on entry (if practicable), and if requested to do so. | | | | |
| 61 | Water Services Act Section 190(5) | 4 | | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 | | | | |
| | WL 2: Version 11: Clause 4.1.1 | | | | |
| | On completing the execution of a warrant the licensee must record the prescribed information on that warrant. | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| 62 | Water Services Act Section 210(5) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee designates a person as an inspector or compliance officer, the licensee must give that person a certificate of authority that includes certain prescribed information. | 4 | The following personnel were interviewed: — People & Culture Coordinator Through discussions with the People & Culture Coordinator, we identified that Aqwest does not currently have a designated person as an inspector or compliance officer that warrants issuance of a certificate of authority. Hence, Aqwest had no activity during the audit period with regards to this obligation. No documents were available for review. The licensee had no activity for this obligation for the period. Recommendations Not Applicable | NP | NR |
| 63 | Water Services Act Section 218(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 In the exercise or purported exercise of a power under the Act, the licensee must ensure that, to the extent practicable, the free use of any place is not obstructed and that as little harm or | 4 | The following personnel were interviewed: Coordinator Networks The following documents were reviewed: Safe Job Planning Guide Promapp: Planning Process for Scheduled Work Orders 20mm Long Service with Scoping Doc 100mm Fire Service Long Version with Scoping Doc Relocate 20mm greater than 1m SHORT with Scoping Doc Aqwest prepares a scoping document for works which include the type of work, duration, any service interruptions, and such details. Through discussions, Aqwest indicated that through the work scoping, they plan on minimising any interference with customers to the best extent possible. They specifically | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | inconvenience is caused and as little damage is done as is possible. | | mention to keep customer driveways free by not parking Aqwest vehicles on customer driveways. We reviewed three scoping documents for three different types of works and found details pertaining to each job, and the work being planned out to minimise interference. Recommendations Not Applicable | | |
| 64 | Water Services Act Section 218(3) | 4 | The following personnel were interviewed: — Coordinator Networks | A | 1 |
| | WL 2: Version 10: Clause 4.1.1 | | The following documents were reviewed— — Samples of work orders | | |
| | WL 2: Version 11: Clause 4.1.1 | | Through discussions, Aqwest outlined that any damages would be reinstated through contracted out suppliers. We were provided with examples of | | |
| | If the licensee does any physical damage in the exercise of a works power or a power of entry, the licensee must ensure that the damage is made good | | reinstatement work and work orders that demonstrate reinstatements were made for instances where damage was caused. We note that there is no standalone policy or procedure for reinstatement and making good any damages, however, reinstatement and the requirement to make good any damages are included within several procedures pertaining to works. | | |
| | and pay compensation to the extent that it is not | | The licensee was compliant with this obligation throughout the reporting period. | | |
| | practicable to make good the damage. | | Recommendations Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| 65 | Water Services Regulations 2013 Regulation 23(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee provides a water supply service in respect of a multiunit development, the licensee must, on the request of the owner or the strata company, assess whether a sub-meter is satisfactory for measuring the quantity or flow of water passing through a pipe supplying water to the unit. | 4 | The following personnel were interviewed: Customer Service Coordinator Coordinator Networks The following documents were reviewed: Promapp: Meter Testing at the Request of the Owner v11.0 Discussions with the relevant managers Through discussions with the relevant managers it was identified that there was only 1 request made by a customer to test a water meter and this was not in reference to a submeter. Therefore, no activities occurred regarding this obligation during the audit period. Aqwest has a process map in place which describes the actions taken when a customer requests testing of a water meter. Although there is no process map specific to the testing of sub meters to assess whether it is satisfactory for measuring the quantity or flow of water passing through a pipe supplying water to a unit, the current process map in place can be used. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 66 | Water Services Regulations 2013 Regulation 24(4) WL 2: Version 10: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Address inadequate Access to Water Meter Issue Process Map — Meter Access Template — Sample of 10 Notices Issued | Α | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information. | | Through discussions and a review of the 'Address inadequate Access to Water Meter Issue Process Map' v8.0, we noted that an Authorised Officer may issue a compliance notice when a meter is obstructed, and the meter readers are unable to access the meter without potentially compromising their safety. Ten (10) samples of compliances notices, were assessed to contain the adequate information as per regulation 24(4) of the Water Services Regulations 2013. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 67 | Water Services Regulations 2013 Regulation 26(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the owner or occupier requests the licensee to test a meter and pays the charge (if any) for testing that type of meter, the licensee must test the meter in accordance with a | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Promapp: Meter Testing at the Request of the Owner v11.0 Through enquiries with the relevant manager, it was identified that any request to test a meter would be handled via the complaint's procedure. Aqwest has a process map outlining the actions taken when testing a meter is requested. There was one (1) instance during the period where a customer requested their meter be tested. This was handled through the complaint procedure and no charges were borne by the customer. As no charge was paid by the customer there was no activity in relation to this obligation over the audit period. The licensee had no activity for this obligation for the period. | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | procedure approved by the CEO for the purpose of this regulation. | | Recommendation Not Applicable | | |
| 68 | Water Services Regulations 2013 Regulation 26(5) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If a meter test finds that the meter is outside the prescribed tolerance applicable, the licensee must take the specified actions, bear the costs of testing and refund or credit any charges paid under regulation 26(3). | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Meter Testing at the Request of the Owner v11.0 Through discussions with the Customer Service Coordinator, it was revealed that there were no instances of a meter being outside the prescribed tolerance and no charges for the testing of meters were administered during the period. The Meter Testing at the Request of the Owner Process, at a high level describes controls around meter replacements. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 69 | Water Services Regulations 2013 Regulation 29(1) WL 2: Version 10: Clause 4.1.1 | 4 | The following personnel were interviewed: — Manager Asset Lifecycle The following documents were reviewed: — Process Development Applications Promapp V17.0 Through discussions with the Manager Asset Lifecycle, we established that no | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 | | activities took place during the period. No deferring of payments could be identified during the audit period by the Manager Asset Lifecycle. | | |
| | The licensee must, on the written request of a developer who is required to pay the licensee an infrastructure contribution in respect of a subdivided lot, defer the payment of the contribution unless regulations 29(3) or 29(4) applies. | | Section 10.0(d) of the Development Applications process map describes the regulations under this obligation and references the requirement to allow for a deferred payment on the request of a developer. As there were no activities during the audit period, there was no controls assessment completed regarding this obligation. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 70 | Water Services Regulations 2013 Regulation 42(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The written order requiring the owner or occupier of land to install a backflow prevention device must set out the date by which the device must be installed and tested (which must be | 4 | The following personnel were interviewed: Manager Asset Lifecycle The following documents were reviewed: Backflow Letter Template Device Installation Required We obtained the Backflow Template Device Installation Required and confirmed that it does set out the date by which the backflow prevention device must be installed and tested. Through discussion, we identified that no written orders have been issued during the period and thus there was no activity during the audit period to exercise this obligation. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | at least 7 days after the day on which the order is given to the owner or occupier). | | | | |
| 71 | Water Services Regulations 2013 Regulation 43(3) | 4 | The following personnel were interviewed: — Manager Asset Lifecycle The following documents were reviewed: | NP | NR |
| | WL 2: Version 10: Clause 4.1.1 | | Backflow Letter Template Test Due Example of Backflow Test Required Letter | | |
| | WL 2: Version 11: Clause 4.1.1 | | We obtained the Backflow Template Test Due and confirmed that it contained that the device must be tested and maintained in accordance with the standard | | |
| | The compliance notice given by the licensee to the owner or occupier of land must specify that the | | as well as the date by which the testing or maintenance needs to be done. Through discussion, we confirmed that no instances of Aqwest issuing a compliance order requiring the landowner or occupier to have their device test or maintained. | | |
| | backflow prevention device be tested or maintained in accordance with the | | The licensee had no activity for this obligation for the period. | | |
| | standard and the date by which the testing or maintenance is required to be done (which must be at | | Recommendation Not Applicable | | |
| | least 7 days after the day the notice is given to the owner or occupier). | | | | |
| | | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| 72 | Water Services Regulations 2013 Regulation 43(6) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The compliance notice requiring the owner or occupier of land to have their backflow prevention device made good as specified in the notice must include the work that is required to be done, the manner in which the work is to be done and the date by which the work is to be done (which must be at least 7 days after the day the notice is given to the owner or occupier). | 4 | The following Personne were interviewed: Manager Asset Lifecycle The following document s were reviewed: Backflow Letter Template Device Maintenance Required We obtained the Backflow Letter Template Device Maintenance Required and confirmed that it specified the work required to be done to ensure the device is made good as specified in the notice, the way the work is to be done as well as the date by which the work is required to be done. Through discussion, we confirmed that there were no compliance notices issued during the audit period. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 73 | Not used | - | - | - | - |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| 74 | Water Services Regulations 2013 Regulation 60(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 If the licensee proposes to exercise a works power in a road and considers that it is necessary to alter the position of infrastructure, the licensee must notify the person who is responsible for the infrastructure and may request that the person make the alterations within the time specified in the notice. | 4 | The following personnel were interviewed: — Asset Delivery Coordinator The following documents were reviewed: — Meetings with relevant Aqwest managers Through discussions with the relevant personnel, we establish that Aqwest is responsible for compliance with regulation 60(2). Aqwest, being the owner of the relevant infrastructure, does not send notices, nor specify a time to alter the position of infrastructure. Furthermore, there was no period in which external infrastructure had to have works conducted. Through discussion, it has been established that a works procedure is incorporated into Aqwest's project management plan and gives the area of proposed works 2 weeks' notice of plans. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 75 | Water Services Regulations 2013 Regulation 63 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 4 | The following personnel were interviewed: — Asset Delivery Coordinator The following documents were reviewed: — Promapp: Plan & Coordinate Construction Works v12.0 — Project Control Template — Works on Roads Traffic Management Plan — Generic Traffic Management Plan — Final Inspection of Water Reticulation Certificate — Notification of Work Card Template | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | If the licensee opens or breaks up the surface of a road, the licensee must complete the relevant work and reinstate and make good the road and must take all reasonable measures to prevent that part of the road from being hazardous. | | Through discussions with relevant personnel and sample testing of nine (9) instances involving breaking the surface of the road, we established that Aqwest conducts an inspection in which a Final Inspection Certificate is signed. During this inspection, the road must have been returned to its initial state to be awarded the certificate. While Aqwest undertake a final inspection of the roadworks to ensure that it is returned to its initial state prior to the issuance of the Final Inspection Certificate, we noted in two (2) samples where certificate wasn't issued. The licensee was not compliant with this obligation during the audit period. Recommendations (1/2023) Aqwest should implement an internal monitoring process (e.g., the use of final inspection certificate tracking sheet) to timely identify completion of projects involving breaking the surface of the road so that a corresponding Final Inspection Certificate is issued without delay. | | |
| 76 | Water Services Regulations 2013 Regulations 65(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must maintain records for all land in respect of which water service charges apply. | 4 | The following personnel were interviewed: Customer Service Coordinator The following information were reviewed: Walkthrough of Authority System Aqwest uses the Authority system to maintain all records of land. A walkthrough of the Authority system was provided by the relevant manager. The enquiry of the land screen contains all the prescribed information as described in the Water Services Regulations 2013 Regulations 65(2). | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| 77 | Water Services Regulations 2013 Regulations 65(2) | 4 | The licensee was compliant with these obligations (i.e. 76 and 77) throughout the reporting period. | A | 1 |
| | OL 16: Clause 4.1.1 | | Recommendation Not Applicable | | |
| | OL 17: Clause 4.1.1 | | | | |
| | The records for all land in respect of which water service charges apply must contain the prescribed information. | | | | |
| 78 | Water Services Regulations 2013 Regulation 65(4) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Unless regulation 65(5) applies, the licensee must make the records for all land in respect of which water service charges apply available for inspection by any person without charge and give a copy of particular records to a person with a material | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: List of Requests for a Copy of Information Discussions with relevant manager Through discussions with the relevant manager, it was established that all records for land in respect of which water service charges apply are made available free of charge for people with a material interest in them. Furthermore, training is conducted to ensure staff are advised to provide account information to customers on request except in family violence cases. Who is deemed as a necessary recipient of records is including in training modules. No documentation of such training could be provided. However, Aqwest does not define who has a material interest in such records and no procedure exists regarding background checks or confirmation that the parties do in fact have a material interest in such information. | В | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | charge, if any, for giving a copy of the records. | | Aqwest has several processes involving interactions with external parties that such as customers, tenants, real estate agents and the Department of Communities. These procedures reflect specific scenarios where Aqwest requires input from such parties. However, there is no information on the assessment of these parties having a material interest in account information. There is no documented procedure directly relating to the supply of records to parties with a material intertest in them. We were unable to determine any instances where a party was not provided records for inspection. A listing was provided by Aqwest outlining all requests for a copy of information from an external party over the audit period. The licensee was compliant with this obligation during the audit period. Recommendation | | |
| | | | Not Applicable | | |
| 78A | Water Services Regulations 2013 Regulation 65(5) and (6) OL 16: Clause 4.1.1 | 4 | Unless a customer gives their consent under regulation 65(6), the licensee must not make a record relating to a customer available for inspection by a person, or give a copy of a particular record relating to the customer to a person, if doing so would disclose information that the customer has requested be kept confidential because the customer believes that disclosure could increase the risk of family violence to the customer or an associated person The following personnel were | Α | 1 |
| | | | interviewed: | | |
| | OL 17: Clause 4.1.1 | | Customer Service CoordinatorRecords Administrator | | |
| | Unless regulation 65(5) | | The following documents were reviewed: | | |
| | applies, the licensee must | | Promapp: Add Notifications of Family Violence | | |
| | make the records for all land in respect of which | | System screenshot warning of domestic violence | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | water service charges apply available for inspection by any person without charge and give a copy of particular records to a person with a material interest in them, on payment of the prescribed charge, if any, for giving a copy of the records. | | Through enquiries with the relevant manager, it was revealed that records can be accessed by individuals after they verify their name and address matches the record wanting to be reviewed. In cases where records are requested to be kept confidential as domestic violence is flagged, A system prompt can be attached to the customer which notifies anyone attempting to access the records of domestic violence and the records are kept confidential. A walkthrough of the Authority system was provided, and screenshots of the system prompt were assessed. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 79 | Water Services Regulations 2013 Regulation 67 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Except as otherwise provided under the Act, the records maintained by the licensee for a period in relation to land are the basis upon which the licensee must determine | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Water Services (Water Corporations Charges) Regulations 2014 Discussions with the relevant manager We confirmed that water service charges differ for varying account types. Aqwest's Authority system is used to generate accounts in which the basis to determine the water charge is documented. Aqwest uses the Water Services (Water Corporations Changes) Regulations 2014 for determining these charge rates based on the account type. If the rate is | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | the water service charges applicable for the period. | | altered this can be configured in the Authority system which is updated in an administration module. Through discussion with management, it was explained that there are differing process maps in place for the generating and updating of accounts based on the account type. All account types utilise the Authority system, which have inbuilt controls to track charge rates. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 80 | Water Services Regulations 2013 Regulations 68(5) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must consider an objection to the records maintained by a licensee under regulation 65 as soon as practicable. | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Promapp: Update a Customer Account in Utilities Through discussion with the Customer Service Coordinator and review of Aqwest's Promapp, Update a Customer Account in Utilities, we confirmed objection from licensee is considered under Step 6.0 of the Promapp. Furthermore, no activity relating to this obligation had taken place during the audit period or the past 10 years. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| 81 | Water Services Regulations 2013 Regulations 68(6) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must give the person by whom the objection was made written notice of the licensee's decision on the objection together with a brief statement of the licensee's reasons for the decision. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Respond to Customer Complaint Promapp: Update a Customer Account in Utilities Through discussion with the Customer Service Coordinator, it was confirmed that objection made is recorded as a complaint. Reviewing Aqwest's Promapp, Respond to Customer Complaint, customer will receive a written notice of the response within 15 business days. No activity was recorded during the audit period. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 82 | Water Services Regulations 2013 Regulations 68(7) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 If the licensee allows an objection, wholly or in part, to entries in the records maintained by a licensee under regulation 65, the licensee must advise the | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Respond to Customer Complaint Promapp: Update a Customer Account in Utilities Through discussion with the Customer Service Coordinator, it was confirmed that objection of entries is recorded as a complaint. Reviewing Aqwest's Promapp, Respond to Customer Complaint, customers will receive a written response within 15 business days. No activity was recorded during the audit period. The licensee had no activity for this obligation for the period. | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | person who objected of any consequent amendment of the records. | | Recommendation Not Applicable | | |
| 83 | Water Services Regulations 2013 Regulations 68(8) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 If the licensee disallows an objection, wholly or in part, to entries in the records maintained by a licensee under regulation 65, the licensee must advise the person of the time within which and the manner in which a review of the decision may be sought. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: CMPM 1 – Introduction v1.0 Promapp: CMPM 2 – Processing Complaints v1.0 Promapp: CMPM 3 – Resolving and Responding to Complaints v1.0 Promapp: CMPM 4 – Complaints Reporting v1.0 Promapp: CMPM 5 – Training and References v1.0 Promapp: Respond to Customer Complaint v16.0 Listing of Complaints over the Audit Period Through discussions with the relevant coordinator, it was revealed that Aqwest did not receive any objections relating to this obligation throughout the audit process. If it were to occur, it will be handled as a complaint. Following Aqwest's Promapp, a customer is advised to receive a response within 15 business days. The full listing of complaints with a short description of the nature of the complaints was provided. There were no instances identified in relation to this obligation. The licensee had no activity for this obligation for the period. Recommendation | NP | NR |
| | | | Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 84 | Water Services Regulations 2013 Regulation 69(3) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Upon receipt of a notice from a person dissatisfied with a decision of the licensee on an objection, the licensee must promptly refer the relevant records to the State Administrative Tribunal for a review. | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Promapp: Respond to Ombudsman and SAT Complaints Through our discussions, Aqwest indicated that there were no activities under this obligation during the audit period. Aqwest's Promapp, Respond to Ombudsman and SAT Complaints, highlights the procedures that are in place to deal with SAT complaints. Under Step 5.0(a), customers' complaint is received and acknowledged. Customer and relevant work area are advised that no other action can be taken. Step 5.0(b), complaint received will be investigated and step 5.0(c) states to respond to the customer and SAT. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 85 | Water Services Regulations 2013 Regulation 70(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Upon receipt of a notice from a person dissatisfied with a decision of the licensee to refuse to extend | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Promapp: Respond to Ombudsman and SAT Complaints Through our discussions, Aqwest indicated that there were no activities under this obligation during the audit period. Aqwest's Promapp, Respond to Ombudsman and SAT Complaints, highlights the procedures that are in place to deal with SAT complaints. Under Step 5.0(a), customers' complaint is received and acknowledged. Customer and relevant work area are advised that no other action can be taken. Step 5.0(b), complaint | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | the time for giving an objection to the licensee or a notice under regulation 69(2), the licensee must promptly refer the decision to the State Administrative Tribunal for a review. | | received will be investigated and step 5.0(c) states to respond to the customer and SAT. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 86 | Water Services Regulations 2013 Regulation 74(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must make any amendment of the records necessary as a consequence of an allowance, wholly or in part, of an objection under the Act or the Valuation of Land Act 1978 or as a consequence of a review by the State Administrative Tribunal. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Customer Refunds Unexpected Water Use Allowance Policy: Policy 1.36 Record of Leak Allowance Given: Type 5 Leak Allowance & Leak Allowance Given GL Through discussion with the Customer Service Coordinator and review of the Promapp, Customer Refunds, we confirmed that a customer refund procedure is available and in place. Refunds occur regularly and is evident from the Leak Allowance document provided. When a refund request is received, the Customer Service Officer will process the refund through Authority Utilities Billing (Step 2.0). Refund payment is reviewed and authorised by the Accounts Coordinator and certified by the Accountant Generalist (Step 2.1). In addition, a monthly balance sheet review of the 'Overpayment' liability is conducted (Step 4.0). | A | NR |
| 87 | Water Services Regulations 2013 Regulation 74(2) | 4 | The licensee had no activity for this obligation for the period. Recommendation Not Applicable | Α | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | OL 16: Clause 4.1.1 | | | | |
| | OL 17: Clause 4.1.1 | | | | |
| | The licensee must, if necessary, as a consequence of the amendment of the records under regulation 74(1), determine or re-determine any water service charge; and, if necessary, provide a rebate or refund. | | | | |
| 88 | Water Services Regulations 2013 Regulation 75(1) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 If a person is liable, under an agreement with the owner of land, for payment of the water service charges in respect of certain land, the person is entitled to receive from the licensee all information necessary for the person to assess his or her liability under the agreement. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Manage Authorisation to Speak With Tenants v6.0 Details of Ombudsman Complaint Discussion with manager Aqwest has a procedure relating to managing authorisation to speak with tenants. Aqwest requires permission from the owner or to observe a copy of the tenancy agreement in order for a tenant to receive access to account information. The process map has reference to the Water Services Regulations 2013, Regulation 75. A copy of the tenancy agreement showing approval of access to account information or written approval by the owner is saved in Authority's Content Manager application. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | | | The was one instance in which a complaint was escalated to the Ombudsman regarding withholding access to a customer account by a tenant. Documentation of the compliant was provided and it is Aqwest's position that in this instance no information was to be provided as the account had already been paid by the real estate agent. Aqwest attempted to inform the customer that her concerns were between themselves being the tenants and the property manager given there was a zero balance with Aqwest. We assessed the complaint and confirmed reasonable steps had been taken by Aqwest to resolve the issue with the tenant. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 88A | Water Services Regulations 2013 Regulation 80H OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 The licensee must, within 60 days after receiving a water efficiency management plan from an owner or occupier of a non-residential lot, approve the plan, request further information, or request a revised plan by written notice. | 4 | The following personnel were interviewed: General Manager Business Services Through discussion with the relevant manager, it was revealed that Aqwest did not receive any water efficiency management plans throughout the audit period. If Aqwest were to receive a water efficiency management plan from an owner or occupier of a non-residential lot, Aqwest would have to formulate a procedure to follow. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 89 | Water Services Regulations 2013 Regulation 85 OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 Compliance notices issued by the licensee must include a brief description of the possible consequences under the Act of not complying with the notice, and the rights of review under the Act in relation to the notice and who may apply for review. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Meter Access Template Backflow Device Installation Letter Template Backflow Test Required Letter Template Backflow Device Maintenance Required Letter Template Through discussions with the relevant manager, it was identified that notices are issued by the licensee when access to meters are restricted or works on backflow devices are required. Aqwest uses templates to issue notices to ensure uniformity and that the required information is presented to the receiver of the notice. Template letters related to meter access and backflow devices were assessed and had adequate information relating to the consequence of not complying with the notice. Furthermore, each template contains information regarding the customer's rights of review in relation to the notice. The previous Operating Licence Audit identified instances where "Inadequate access to meter" notices did not contain the rights of review under the Act in relation to the notice and who may apply for review. Aqwest became fully compliant with the requirements by 1 July 2021. The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. Recommendation | A | 3 |
| | | | Not Applicable. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 90 | Water Services Regulations 2013 Regulation 86(6) WL 2: Version 10: Clauses 4.1.1 WL 2: Version 11: Clauses 4.1.1 If the licensee appoints an employee as an authorised or approved officer for the purposes of the Criminal Procedure Act 2004 Part 2, the licensee must issue the officer a certificate, badge or identity card identifying the officer as a person authorised to issue infringement notices. | 3 | The following personnel were interviewed: People & Culture Coordinator The following documents were reviewed: No documents reviewed. Through discussions with the People & Culture Coordinator, we identified that Aqwest does not issue infringement notices and therefore, during the audit period, Aqwest did not appoint an employee for the purposes of the Criminal Procedure Act 2004 Part 2. Hence, Aqwest had no activity during the audit period with regards to these obligations. The licensee had no activity for this obligation for the period. Recommendations Not Applicable | NP | NR |
| 91 | Water Services Regulations 2013 Regulation 86(9) WL 2: Version 10: Clauses 4.1.1 WL 2: Version 11: Clauses 4.1.1 The licensee must maintain a list of persons appointed | 3 | | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating | | | | | |
|-----|--|-------------------|---|--------------------|----------------------|--|--|---|--|--|
| | to be authorised officers or approved officers for the purposes of the Criminal Procedure Act 2004 Part 2, and must, on request, give a copy of the list to the CEO or to the chief executive officer of the Public Services principally in the administration of the assisting Criminal Procedure Act 2004. | | | | | | | | | |
| 92 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 8(1)-(3) | 4 | The following personnel were interviewed: — Business Services Administrator The following information were reviewed: | A | 2 | | | | | |
| | WL 2: Version 10: Clauses 4.1.1 | | Aqwest's website: "Water supply service entitlements" https://aqwest.com.au/about-aqwest/water-supply-service-entitlements Aqwest's website: "Service connections" https://aqwest.com.au/building,- | | | | | | | |
| | WL 2: Version 11: Clauses 4.1.1 | | | | | | | <u>developing,-renovating/service-connections</u> Aqwest's website: "Fees and charges" https://aqwest.com.au/building,-developing,-renovating/fees-and-charges | | |
| | The licensee must have written information for | | | | | | | | | |
| | customers about the | | Through discussions and a review of Aqwest's website, including webpage history, we confirmed that Aqwest had written information for customers about | | | | | | | |
| | prescribed matters | | the prescribed matters regarding connections according to Clause 8 (2) of the | | | | | | | |
| | regarding connections and the information must be | | Water Services Code of Conduct (Customer Service Standards) 2018. The information is publicly available through Aqwest's website to customers and | | | | | | | |
| | publicly available. (Note: the information required by clause 8(2)(a) applies to | | addresses the following details as required by this obligation: | | | | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | the Water Corporation, Bunbury Water Corporation, and Busselton Water Corporation only and the information required by clause 8(2)(g) applies only to licensees that supply potable water). | | Entitlements under section 73 of the Water Services Act in provision of water services. Duties of Aqwest under section 21 of the Water Services Act in providing water services and works. Refuse to provide services under section 21 and subsection 1(b). The "Service Connections" webpage includes details on how to apply for a connection, along with a Water Service Application Form that sets out the terms and conditions of the service and also includes important information for customers. The "Service Connections" webpage includes reference to fees and charges associated with connections, which redirects to the "Fees and charges" webpage. The Water Service Application Form mentions that the work will be completed within 10 business days, which is the requirement under clause 9(2). The 2020 Operating Licence Audit identified Aqwest "service connections" web page was missing the following information between 1 July 2020 and 31 January 2021: a) Entitlements under section 73 of the Act to the provision of water supply services; and b) Aqwest's functions under section 21 concerning the provision of water supply services. There was no impact on customers already connected. There were no complaints or enquiries from potential customers. The breach occurred due to an oversight in preparation of the webpages. The website was updated to comply with the obligation. The requirement to include these matters has now been included in the website compliance checklist which is used as a regular check on information provided through the website. Aqwest was fully compliant from 1 January 2021. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. | | |
| | | | Recommendation Not Applicable | | |
| 93 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 9(2) and (4) WL 2: Version 10: Clauses 4.1.1 | 2 | The following personal were interviewed: — Performance and Reporting Analyst The following documents were reviewed: — Timeliness of Connections 2020-2021 — Timeliness of Connections 2022-2023 | A | 2 |
| | WL 2: Version 11: Clauses 4.1.1 The licensee must ensure that, in any 12-month period, 90% of water supply service connections | | Aqwest is required by Clause 9(2) of the Water Services Code of Conduct (Customer Service Standards) 2018, to complete a connection of water supply services within "10 business days". The relevant clause is also present under the 'Information' sheet from the 'Timeliness of Connections' documents, which are manual spreadsheets based on an Authority query for standard (20mm) services. | | |
| | are completed before the end of 10 business days, starting on the day on which the customer has | | Through discussions with the relevant personnel and a review of 'Timeliness of Connections' documents for period 2020-2021 and 2022-2023, we observed a breach to this obligation. | | |
| | paid the relevant fees and | | The calculation to complete the connection of water supply services within "10 business days" commence when prestart requirements are met, and the work | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | complied with the relevant requirements. | | instruction is issued unless otherwise expressly agreed with the customer. Aqwest compares the actual start date for compliance with the date service installed to calculate the number of business days until completion and determine its compliance to this obligation. | | |
| | | | In the Annual Compliance Report for 30 June 2022, Aqwest was only able to demonstrate 80% of connections were completed within 10 working days. 11 out of 82 connections were completed after the end of 10 business days. | | |
| | | | A new IT system was implemented during the period which caused a lack of visibility with regards to the compliance with the 10-day requirement. Because of the system upgrade, it caused problems in ensuring completeness of data for the period FY2021/22. It could not be ascertained which system glitch that caused the gap, but the system upgrade itself resulted to the absence of real-time data recording impacting completeness of data queries during the period when the system upgrade was executed. | | |
| | | | However, subsequent to the IT system upgrade, Aqwest was able to ensure completeness of the data, hence it became compliant for the period FY2022/23 where the compliance ratio is 92% which exceeds that target of 90%. Recommendation | | |
| | | | No further recommendation provided as the issue with the IT system was previously resolved. | | |
| 94 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 10(2) | 3 | The following personal were interviewed: — Customer Service Coordinator The following documents were reviewed: — Consumption bill | A | 1 |
| | OL 16: Clauses 4.1.1 | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | OL 17: Clauses 4.1.1 If the licensee charges a fixed charge, the licensee must issue a bill for a fixed charge to each customer at least once in every 12-month period. | | Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. The consumption bill is issued at least once in every 12-month period if the licensee charges a fixed charge. During the test, it was noted that if the property has zero (0) consumption, the bill will not be generated and sent to the account. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 95 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(2) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 If the licensee charges a quantity charge, the licensee must issue a bill for a quantity charge to each customer at least once in every 4-month period. | 2 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Tariff History on Consumption 2019-2024 — Consumption Bill — Supply Charge Notice Through discussions with the key stakeholders, procedures, and work instructions, we observed that Aqwest has processes in place to obtain meter readings after three (3) projected reads. Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. | Α | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | We reviewed 17 samples, and found no breach. During the test, it was noted that if the property has zero (0) consumption, the bill will not be generated and sent to the account. | | |
| | | | In the Annual Compliance Report for the period ended 30 June 2022, Aqwest identified: | | |
| | | | 3 customers in the cycle one (1) read and 18 customers in cycle three (3) read had their bills issued later than the 4-month time frame. This was due to a software malfunction following an update to the billing system. | | |
| | | | Aqwest has resolved the issue with the software vendor. In the meantime, it has identified and calculated bills manually for customers likely to be affected. Aqwest returned to compliant by the fourth (4th) read in June 2022. | | |
| | | | In the Annual Compliance Report for the 30 June 2023 Financial Year, Aqwest identified one (1) customer was not issued a bill within 4 months following a meter replacement. | | |
| | | | The missing bill was due to the customer on 21/11/2022. The bill related to the period ending 21/11/2022. No bill was issued between 19 August 2022 and 22 February 2023. | | |
| | | | The breach occurred because the team did not issue an estimated bill while undertaking an investigation of missing information. The bill was issued late, and the customer offered an interest-free payment plan. | | |
| | | | All billing team members were made aware of the incident and trained on the use of estimated bills, where data is not available for billing. Aqwest was compliant by 9 February 2023. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|---|---|--------------------|----------------------|
| | | | The licensee was not compliant prior to 9 February 2023, but was compliant after this date following the implementation of the internal controls. Recommendations Recommendations are not required because Aqwest has effective controls already in place and resolved the causes of the non-compliance during the audit period. | | |
| 96 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(3) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 A bill for usage must be based on a meter reading to ascertain the quantity supplied or discharged. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Tariff History on Consumption 2019-2024 Consumption Bill Supply Charge Notice Estimations (Type 6, Type 21, Type 22) Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. | A | 1 |
| 97 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(4) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 If an accurate meter reading is not possible, a bill for usage must be | We reviewed 17 samples, and no breach was found. During the test, it was noted that if the property has zero (0) consumption, the bill will not be generated and not sent to the corresponding customer account. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | A | 1 | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|----------------------------------|--------------------|----------------------|
| | based on an estimate, in accordance with the prescribed regulations (if any), of the quantity of water supplied or wastewater discharged. (Note: The Water Services Regulations 2013 did not address the estimation of bills at the time this Reporting Manual was published). | | | | |
| 98 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(5) | 4 | | Α | 1 |
| | OL 16: Clauses 4.1.1 | | | | |
| | OL 17: Clauses 4.1.1 | | | | |
| | If an accurate meter reading is not possible and there are no applicable regulations, a bill for usage must be based on a reasonable estimate of supply or discharge using one of the prescribed methods. | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| 98A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 11(6) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 Despite subclauses 11(4) and (5), a bill for usage based on a meter reading must be issued at least once in every 12-month period. | 2 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Estimations (Type 6, Type 21, Type 22) Consumption Bill Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. The consumption bill for usage based on a meter reading is issued at least once in every 12-month period. During the test, it was noted that if the property has zero (0) consumption, the bill will not be generated and not sent to the corresponding customer account. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | A | 1 |
| 99 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 12 OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Tariff History on consumption 2019-2024 — Consumption bill — Supply charge notice — Estimation worksheets (Type 6, Type 21, Type 22) | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| | The licensee must send a bill to the address of the place where the water service is provided or, if the customer nominates another address, to the nominated address. | | Through discussions with key stakeholders and examination of fifteen (15) documents, no exceptions are found. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 100 | Water Service Code of Conduct (Customer Service Standards) 2018 Clause 13(1) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 Each bill must contain the prescribed information. | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Sample Water Bills We sampled 15 water bills and confirmed that they contain that prescribed information under Clause 13(1) of the Water Services Code of Conduct (Customer Service Standards) 2018. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 100A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(3) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 A bill issued for 2 or more water services must specify | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Sample Water Bills with 2 or more water services We sampled 4 water bills that had 2 or more water services and confirmed that they specify the charge payable for each service separately. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| | the charge payable for each water service. | | Recommendation Not Applicable | | |
| 101 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(4) OL 16: Clauses 4.1.1 | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Consumption Bill | A | 1 |
| | OL 17: Clauses 4.1.1 | | Clause 13(4)(g) requires information on the bill, if available, about the | | |
| | Each bill for usage for a metered water service must contain the specified information. | | customer's water usage in the billing period compared with the customer's water usage – (i) in the previous billing period; and (ii) in the corresponding billing period in the previous year. Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. We reviewed 11 samples, and no breach was found. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | | |
| 101A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(5) | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Consumption bill | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| | OL 16: Clauses 4.1.1 | | Clause 13(5) of the Water Services Code of Conduct (Customer Service | | |
| | OL 17: Clauses 4.1.1 | | Standards) 2018 states: If a bill for usage for a metered water service was based on an estimate, the bill must inform the customer that the licensee will tell the | | |
| | If a bill for usage for a metered water service was based on an estimate, the | | customer on request — (a) the basis of the estimate; and (b) the reason for the estimate. | | |
| | bill must inform the customer that the licensee will tell the customer the prescribed information on | | Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. We reviewed 11 samples, and no breach was found. | | |
| | request. | | The licensee was compliant with this obligation throughout the reporting period. | | |
| | | | Recommendation Not Applicable | | |
| 102 | Not used | - | - | - | - |
| 102A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(6) | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Consumption bill | A | 2 |
| | OL 16: Clauses 4.1.1 | | | | |
| | OL 17: Clauses 4.1.1 | | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 13(6) states: | | |
| | Each bill must contain the prescribed information. | | (6) Each bill must contain the following general information – a. The licensee's website address. b. A telephone number for account, payment, and general enquiries. c. A telephone number for complaints. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | d. A Freecall telephone number for the office of the water services ombudsman. e. The telephone number of the 24 hour information line provided in accordance with clause 45. f. Contact details for account, payment, and general enquiries for use by customers with hearing or speech impairment. g. For a residential customer, the telephone number for interpreter services together with the National Interpreter Symbol and the words "Interpreter Services". h. A statement that the website contains information about estimates, meter reading and testing, complaints, and review. i. A statement that the bill can be reviewed in accordance with the licensee's review procedure mentioned in clause 20. We reviewed nineteen (19) samples of bills to validate if the information required from (a) to (i) are included. The results of our review did not reveal any exception. The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. Recommendation Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| 103 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 14(1) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 If a bill is based on an estimate, the licensee must tell the customer on request the basis of the estimate and the reason for the estimate. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Consumption bills Estimates worksheets (Type 6, Type 21, and Type 22) Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. We reviewed 11 samples, and no breach was found. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 104 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 14(2) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 If a bill is based on an estimate, the licensee must make any adjustments to the next bill to take into account the extent to which the estimate was not | 3 | The following personnel were interviewed: - Customer Service Coordinator The following documents were reviewed: - Consumption bills - Estimates worksheets (Type 6, Type 21, and Type 22) Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. We reviewed 11 samples, and no breach was found. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | reasonable having regard to a subsequent and accurate meter reading. | | Recommendation Not Applicable | | |
| 104A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 15(3) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the prescribed information. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Consumption bills Estimates worksheets (Type 6, Type 21, and Type 22) Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. We reviewed 11 samples, and no breach was found. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 105 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 16(1) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 The licensee must provide to the customer on request a meter reading and a bill | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Schedule and process Tenant Vacate / Change Ownership Reads v6.0 Bill Review: Our Service Commitment Listing of Vacate Reads Through discussions with the relevant manager, it was revealed that most request for meter reads outside the usual business cycle are vacate reads. This | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | (or revised bill if) for outstanding charges outside of the usual bill cycle, or in case the customer disputes an estimate. | | is conducted when there is a change in ownership of the property or vacating of a tenant from the property. Aqwest has a process map which describes the receiving and scheduling of vacate meter read requests. An Excel spreadsheet is used to schedule the reads and assign relevant officers. This spreadsheet is used to monitor any outstanding reads. The vacate reads spreadsheet was assessed and adequately captures requests for reads under these circumstances. Aqwest's bill review document outlines Aqwest's duties to review a bill or conduct a meter read upon request. Reference to the appliable standards is contained within the document. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 106 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 17(2) & (3) | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Water Leak Webpage of Aqwest Website | A | 1 |
| | OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 The licensee must have a written policy, standard or set of guidelines (available | | The Aqwest website has information on water leaks including information on Aqwest's leak allowance program for customers. A detailed set of guidelines is available on the Aqwest website on how to apply for the leak allowance program including the application criteria, the instances where an application would not be considered, the calculation criteria of the allowance amount and a link to the allowance application form to be completed by customers. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | on the licensee's website and a hardcopy provided to a customer upon request at no charge) in relation to granting a discount to a customer whose meter reading indicates a water usage that is higher than normal for the customer but is likely to have been wasted because of a leak from the customer's system. | | The Wayback Machine internet archive was used to view that a water leaks page existed throughout the audit period. Aqwest had similar information available to the public on the 25 th of September 2020 where a snapshot of the webpage was assessed. Similar guidelines regarding leak allowance were documented. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | | |
| 107 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(2) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 | 2 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Undercharge Consumption Bill — Notice Letter of the Undercharge Amount | Α | 2 |
| | The licensee cannot recover an undercharged amount from a customer unless it is for water services provided in the 12-month period ending on the | | Through discussions with key stakeholders, Aqwest does not recover undercharge amounts that occurred greater than 12-months ago. We performed sample testing on 14 undercharge accounts and did not observe any instance of undercharge recovery for instance that occurred greater than 12-months prior to the day on which the licensee informed the customer of the undercharging. The licensee was not compliant with this obligation in the previous audit period, | | |
| | day on which the licensee informed the customer of the undercharging. | | however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | applicable as the licensee became compliant with this obligation during the current audit period. Recommendation Not Applicable | | |
| 108 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(3) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Undercharge Consumption Bill Notice Letter of the Undercharge Amount Clause 18(3) The undercharged amount must be the subject of and explained. in — (a) a special bill for the undercharged amount; or (b) a separate item in the next bill. Through discussions with the key stakeholders, reviewing relevant policies and procedures, and performed sample testing of 14 undercharged accounts, we found that all bills reflected the undercharged on a special bill or included as a separate item in the next bill. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | | | |
| 109 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(4) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 The licensee must not charge interest or late payment fees on an undercharged amount. | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Consumption Bills The result of our sample testing of thirteen (13) undercharged accounts revealed no interest charged or late payment fees. The licensee was compliant with this obligation during the audit period. Recommendation Not Applicable | A | 1 |
| 110 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 18(5) OL 16: Clauses 4.1.1 OL 17: Clauses 4.1.1 The licensee must allow a customer to pay an undercharged amount by way of a repayment plan that has effect for the duration of the shorter of the prescribed periods starting on the day | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Undercharge Consumption Bill Notice Letter of the Undercharge Amount Through discussions with the key stakeholders, reviewing relevant policies and procedures, and performance of sample testing of 14 undercharged accounts, we confirmed that the Contact Centre offers repayment plans. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | that the bill in clause 18(3) is issued. | | | | |
| 111 | Not used | - | - | - | - |
| 111A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must, within 15 business days of becoming aware of an overcharge, credit the overcharged amount to the customer's account or send the customer a notice informing the customer of the overcharging and recommending options for how the overcharged amount may be refunded or credited to the customer's account. | 1 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: General Overcharge Undercharge – Supply Fees Calculation Notice Letter for Overcharge Consumption Bill Interim Supply Fee Adjustment Letter Promapp: Customer Overcharges Through discussions with the key stakeholders, and review of procedures, and work instructions, we observed that Aqwest has processes in place to notify or credit a customer's account within 15 business days of becoming aware of an overcharge event. Further discussions, we identified that Aqwest, in some instances, overcharged customers. Overcharging occurs because of a human error, such as wrong meter readings/estimations. During the review process of the customer's account, if Aqwest identifies a overcharge event, either through a customer or through internal processes, Aqwest immediately credit the customer's account and provides the customer, either by email, phone call, letter and/or an adjusted charge account (bill), with details on how the credit may be refunded or alternatively, held on the account. Our test of five (5) samples to check that Aqwest credits or refunds the overcharged amount to the customer's account within 15 days of the licensee | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | receiving the instructions revealed no exceptions. | | |
| | | | The licensee was compliant with this obligation throughout the reporting period. | | |
| | | | Recommendation Not Applicable | | |
| 112 | Not used | - | - | - | - |
| 112A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(3) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 If the licensee sends the customer an overcharging notice and receives instructions from the customer about the refunding or crediting of the overcharged amount, the licensee must refund the overcharged amount, or credit the overcharged amount, or credit the overcharged amount to the customer's account within 15 business days of the licensee receiving the instructions. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Notice Letter for nineteen (19) different customers We randomly selected a sample of 19 accounts identified as being overcharged and did not detect any breaches against the criteria as mentioned in Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(3) The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| 112B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(4) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 If instructions from the customer about the refunding or crediting of the overcharged amount have not been received by the licensee at the end of the period of 10 business days starting on the day an overcharging notice is sent, the licensee must credit the overcharged amount to the customer's account before the end of the period of the next 15 business days. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Undercharge or overcharge letter The purpose of the letter is to ensure that customers are aware of the credit or overcharge being applied to their account. We reviewed the letters and found these to be in place. The result of the review of four (4) samples of customer accounts revealed existence of controls and are found to be effective. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 112C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 19(5) OL 16: Clause 4.1.1 | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Undercharge or overcharge letter | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | OL 17: Clause 4.1.1 The licensee must notify | | Reviewed a sample of 4 letters and found these to be in place. Once a overcharge amount is credited to a customer account, then a letter is sent out. | | |
| | the customer immediately after crediting the overcharged amount to the customer's account under subclause (2)(a), (3) or (4). | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 113 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must review a bill on the customer's request. | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Bill Review Customer Information Standard — Aqwest's Website: "Review my bill" https://aqwest.com.au/forms/billing-enquiries-and-requests/review-my-bill Aqwest has documented procedures to review a bill on customer request, which is published on their website. The website also has an online system for customers to submit a request to review a bill. | A | NR |
| 114 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The license must have a written procedure for the | 4 | We examined the website and verified that the required information regarding the review of water use charges is publicly available. There was no activity during the audit period relating to this obligation. Recommendation Not Applicable | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | review of a bill on the customer's request. | | | | |
| 115 | Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 20(3) & (6) OL 16: Clause 4.1.1 The review procedure in clause 20(2) must include the specified information and be available on the licensee's website and a hardcopy provided to a customer upon request at no charge. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Bill Review Customer Information Standard Aqwest's Website: "Review my bill" https://aqwest.com.au/forms/billing-enquiries-and-requests/review-my-bill Aqwest has documented procedures to review a bill on customer request, which is published on their website. The website also has an online system for customers to submit a request to review a bill. We examined the website and verified that the specified information regarding the review of bill is publicly available, which covers the following: Requesting for a bill review and meter readings or testing; Procedures that will be followed if it is found that the reading or bill is wrong which results in an overcharge or undercharge; and The customers right to refer to the Ombudsman or SAT if unsatisfied with the outcome of the review. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| 116 | Services Code of Conduct (Customer Service Standards) 2018 Clause 20(4) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The review procedure must state that the customer may, but does not have to, use the licensee's complaints procedure mentioned in clause 46 before or instead of applying to the water services ombudsman or, if available, making an appeal from, or applying for a review of, the decision under regulations mentioned in section 222(2)(k) of the Act. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Bill Review Customer Information Standard Aqwest's Website: "Review my bill" https://aqwest.com.au/forms/billing-enquiries-and-requests/review-my-bill Aqwest has documented procedures to review a bill on customer request, which is published on their website. The website also has an online system for customers to submit a request to review a bill. We examined the website and verified that the specified information regarding the review of bill is publicly available, which covers the following: Requesting for a bill review and meter readings or testing; Procedures that will be followed if it is found that the reading or bill is wrong which results in an overcharge or undercharge; and The customers right to refer to the Ombudsman or SAT if unsatisfied with the outcome of the review. In terms of reference to Aqwest's complaints procedure, which states: "Provide you with information about the operation of our internal and external complaints process, which includes your right to refer any complaint to the Energy and Water Service Ombudsman or make application to the State Administrative Tribunal (SAT) for a review of such decisions." We noted that this phrase is not clear about the option for customers to use Aqwest's complaints procedure, if they want, before or instead of applying to the ombudsman or SAT. | В | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | | | The Annual Compliance Report for the 30 June 2021 Financial Year noted that the 2020 Operating Licence Audit identified the bill review procedure and supporting documents referred to applying to the Water Services Ombudsman for a review but did not refer to the right of applying the State Administration Tribunal under Section 222(2)(k) for the period 31 July 2020 to 31 December 2020. | | |
| | | | The Impact was minimal because customers were advised of their right to apply to the Ombudsman. At the time templates were prepared the distinction between the Ombudsman and the State Administrative Tribunal was not understood. A review of complaints, including Ombudsman referrals was undertaken. No relevant issues were identified. Bill review process and the template statement have been updated to comply with the obligation. All staff have been briefed to understand the obligation. | | |
| | | | Recommendation Not Applicable | | |
| 117 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 20(5) | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Bill Review Customer Information Standard | A | 1 |
| | OL 16: Clause 4.1.1 | | Aqwest's Website: "Review my bill" | | |
| | OL 17: Clause 4.1.1 | | | | |
| | The licensee must inform | | https://aqwest.com.au/forms/billing-enquiries-and-requests/review-my-bill | | |
| | the customer of the | | Aqwest has documented procedures to review a bill on customer request, which | | |
| | outcome of a review of the customer's bill as soon as | | is published on their website. The website also has an online system for customers to submit a request to review a bill. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|--|--------------------|----------------------|
| | practicable or otherwise less than 15 business days from the day the customer's request for review was received. | | We examined the website and verified that the specified information regarding the review of bill is publicly available, which covers the following: Requesting for a bill review and meter readings or testing; Procedures that will be followed if it is found that the reading or bill is wrong which results in an overcharge or undercharge; and The customers right to refer to the Ombudsman or SAT if unsatisfied with the outcome of the review. Through discussions with the key stakeholders and review of the Bill Review Customer Information Standard, we observed that the procedure outlines that if during a bill review it is identified that a customer has been charged incorrectly, Aqwest will fix the error within 15 business days. Further queries revealed that 99% of bill review requests come through phone calls. There were 7 requests that came through the website during the audit period. There were no issues noted as outcome was sent to customer within 1 days. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 117A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 21 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Sample Water Bills Through discussions, Aqwest indicated that they notify customers of changes in the amount or rate of a water service charge through the next bill. The details are included on the back of the bill under tariffs. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | The licensee must notify each of its customers of any change to the amount or rate of a water service charge in accordance with the requirements in clause 21(2). | | We reviewed a sample of 12 bills and noted that the new rate information was included on the back of the bill, however, there was no notification that about the rate change. Hence, there is the risk that customers might not be clearly made aware of any such rate changes. Clause 21(2) does not clearly prescribe the method of notification for the rate change. To comply with this obligation, Aqwest notifies the customers on the rate change by reflecting the tariffs at the back of the bill. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 118 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 23 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Issue Cycle Read Accounts Process Map Billing Due Date & Value 2019-2020 Sample Bills Aqwest provides 28 days for customers to pay the bills starting from the bill issue date. This is setup in Authority in a way that automatically calculates the bill due date. We checked for a sample of 12 bills whether customers were given more than 14 days to settle the bill, starting from the date the bill was issued. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | | | Recommendation Not Applicable | | |
| 119 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 24(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must allow a customer to pay a bill using any of the prescribed methods selected by the customer. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Aqwest Website https://aqwest.com.au/your-home/accounts-and-billing/pay-a-bill Sample Bills Through discussions and review of relevant documentation, we confirm that Aqwest allows customers to pay bills through Bipoint payment (either online or telephone), BPay, Direct Debit, Centrepay, In person at Australia Post or by Post and via Mail. | A | 1 |
| 120 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 24(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must, when offering bill payment method options, inform the customer of the fees and charges (if any) associated | 4 | We tested a sample of 11 bills to check if the options were made available in the bill. The payment methods prescribed by Aqwest do not incur any additional charges hence there was no need to disclose that information. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | with each bill payment method offered. | | | | |
| 121 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 25(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 Before receiving a bill payment by direct debit the licensee must obtain the express consent of the customer or of an adult person nominated by the customer to give consent. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Direct Debits Aqwest's website: set up direct debit payments. https://aqwest.com.au/forms/billing-enquiries-and-requests/set-up-direct-debit-payments-online Aqwest's website: Direct Debit Service Agreement https://aqwest.com.au/forms/billing-enquiries-and-requests/set-up-direct-debit-payments-online We noted that customers can set up a direct debit through Aqwest's website where they fill out their details. The webpage also has the Direct Debit Service Agreement to which customers need to agree if they want to setup direct debit. These consents are documented in the Content Manager and destroyed when no longer required. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 122 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 26(1) | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | OL 16: Clause 4.1.1 | | Customers in Credit | | |
| | OL 17: Clause 4.1.1 | | Promapp: Update a Customer Account in Utilities | | |
| | The licensee must accept payment in advance from a customer on a customer's request. | | We observed that Aqwest accepts payments in advance from customers and there are in fact customer accounts whose accounts are in credit as reflected on its 'Accounts In Credit' excel report. The procedure <i>Update a Customer Account in Utilities</i> mentions about updating customer accounts; however, it does not specifically set out how credit payments are applied to the customer account and how it is managed. The licensee was compliant with this obligation during the audit period. Recommendation Not Applicable | | |
| 123 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 27 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Promapp: Updating a Customer Account in Utilities Update Account Details Work Instruction Aqwest's website: Change your details. https://aqwest.com.au/forms/change-your-details/update-my-contact-details Aqwest's procedure Updating a Customer Account in Utilities (step 2b) sets out the step for redirection of customer mail, at no cost to the customer. The attached work instruction named Update Account Details includes detailed guidelines on how to update customer details. | Α | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 124 | Not used | - | - | | |
| 124A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must advise a customer who has been assessed as experiencing payment difficulties that they have a right to pay the bill under a payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Aqwest's website: Financial support https://aqwest.com.au/your-home/accounts-and-billing/financial-support Financial Hardship Policy Promapp: Process Hardship Utility Grant Scheme Applications Promapp: Debt Recovery Aqwest has policies and procedures to support customers that are in financial hardship. Aqwest has developed the procedure on Payment Difficulties and Debt Recovery Authorizations, which under clause 5 states: customers who are unable to pay their accounts are encouraged to engage with us to arrange an alternative method of payment. Aqwest's website also contains the details under the heading "Get in touch, we can help you" that lists out possible plans such as: agree to a flexible weekly, fortnightly or monthly payment plan. protect you from water supply restrictions and additional fees. remove the worry of debt collection or legal action. We reviewed 12 accounts sample and did not find any breaches where customer capacity to pay the bills was not considered. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| 404B | Water Coming Code of | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable The following personnel were interviewed: | | |
| 124B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(3) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing payment difficulties, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must | 3 | Customer Service Coordinator The following information from these weblinks were reviewed. Financial Assistance Aqwest Hardship Utility Grant Scheme Western Australian Government (www.wa.gov.au) We reviewed 20 accounts sample and did not find any breaches. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| | also take into account how much water has been supplied or wastewater has been discharged in previous billing periods. | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| 124C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 28(4) | 3 | The following personnel were interviewed: — Customer Service Coordinator The following information and documents were reviewed: | A | 1 |
| | OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must consider and decide whether or not the payment plan or other arrangement for a customer who has been assessed as experiencing payment difficulties should be interest-free, or fee-free, or both. | | Hardship Utility Grant Scheme Western Australian Government (www.wa.gov.au) The Hardship Utility Grant Scheme Guidelines was published by Department of Communities in association with Aqwest, which states that "Under the Utility Codes, a utility provider must offer a residential customer who is experiencing financial hardship at least the following payment arrangements: additional time to pay the bill; and an interest free and fee-free instalment plan under which the residential customer is given additional time to pay a bill or to pay arrears (including any disconnection and reconnection charges) and is permitted to continue consumption. Process Mapping for "Recover Debt from Customers" It is identified in the process mapping for "Recover Debt from Customers" that there is a step which includes the assessment of interest free or fee-free instalment plans". We reviewed 20 accounts sample and did not find any breaches. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| 125 | Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 29(1) & (2) WL 2: Version 10: Clause 4.1.1, Clause 1.1.1 WL 2: Version 11: Clause 4.1.1, Clause 1.1.1 The licensee must have a written policy in relation to financial hardship that is approved by the ERA. | 4 | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable The following personnel were interviewed: General Manager Finance Services The following information were reviewed: Financial Hardship Policy for Water Services July 2023 Financial Hardship Policy for Water Services November 2018 Aqwest's website: https://aqwest.com.au/your-home/accounts-and-billing/financial-support ERA's website: https://www.erawa.com.au/water/water-licensing/financial-hardship-policies Through discussions with the General Manager Finance Services, and through review of the policy and websites including webpage history, we can confirm that Aqwest has a financial hardship policy that is approved by the ERA. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |
| 126 | Not used | - | Recommendation Not Applicable | | |
| 126A | Water Services Code of Conduct (Customer Service | 4 | The following personnel were interviewed: — General Manager Finance Services The following documents were reviewed: — Financial Hardship Policy for Water Services July 2023 | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|---|--------------------|----------------------|
| | Standards) 2018 Clauses 29(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Unless the ERA approves otherwise, the licensee's financial hardship policy must comply with the ERA's guidelines (if any) in relation to financial hardship policies. | | Financial Hardship Policy for Water Services November 2018 ERA Approved Financial Hardship Policy (website) https://www.erawa.com.au/water/water-licensing/document-archive/financial-hardship-policies We obtained a copy of the financial hardship policy of Aqwest and checked whether it complied with ERA guidelines. Furthermore, we checked if the policy was reviewed every five years as per the ERA guidelines. Aqwest's Financial Hardship Policy was finalised, approved and posted on ERA's website in December 2018. We found that the contents of the policy were in accordance with the ERA guidelines. The next review of the policy falls due on December 2023, but we noted that the policy was reviewed in July 2023, meeting the review requirement of the ERA guideline. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | | |
| 126B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(4) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 4 | The following personnel were interviewed: General Manager Finance Services The following documents were reviewed: No document for review. Aqwest's responses to our queries regarding any amendments to the Financial Policy indicated that there were no amendments to the policy following its endorsement in 2018. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | Unless the ERA approves otherwise, amendments to the licensee's financial hardship policy must be approved by the ERA and comply with the ERA's guidelines (if any) in relation to financial hardship policies. | | Recommendation Not Applicable | | |
| 127 | Not applicable | N/A | Not Applicable | - | - |
| 128 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(6) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause'4.1.1 The licensee's financial hardship policy must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge. | 4 | The following personnel were interviewed: General Manager Finance Services The following documents were reviewed: Financial Hardship Policy Aqwest Website: https://aqwest.com.au/your-home/accounts-and-billing/financial-support Aqwest's Financial Hardship Policy is available on their website. Moreover, if a customer requests, a hard copy will be given at no charge. On another note, we note that there is no fee mentioned in Aqwest's schedule of fees and charges for charging such a fee for providing copies of policy documents. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | A | 1 |
| 129 | Not used | - | - | - | - |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|--|--------------------|----------------------|
| 129A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(7) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must review its financial hardship policy at least once in every 5-year period. | 4 | The following documents were reviewed: Financial Hardship Policy for Water Services July 2023 Financial Hardship Policy for Water Services November 2018 ERA Approved Financial Hardship Policy (website) https://www.erawa.com.au/water/water-licensing/document-archive/financial-hardship-policies Aqwest reviews its Financial Hardship Policy every five years, and this is documented within the policy under Section 9: Approval and Review. Aqwest's Financial Hardship Policy was approved by ERA in December 2018 and the next review falls due in December 2023. We noted that the policy was reviewed in July 2023 which is six months prior to the review date. Regarding any direction to review the policy by ERA, Aqwest indicated that the ERA had not requested to review the policy ever since its approval in 2018. | A | 1 |
| 129B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(8) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must review its financial hardship policy if directed to do so by the ERA. | 4 V fr | | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| 129C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 29(9) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must consult with relevant consumer organisations when formulating or reviewing its financial hardship policy. | 4 | | A | 1 |
| 130 | Not used | - | | | |
| 130A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(2) OL 16: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Promapp: FMM 4. Debtor Management v8.0 | A | 2 |
| | OL 17: Clause 4.1.1 The licensee must advise a customer who has been assessed as experiencing financial hardship that they | | Assessment of the Debtor Management process revealed under section 4.0 (f) (h) that Aqwest prescribes instances of interest free plans for customers experiencing financial hardship. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | have a right to pay the bill under an interest-free and fee-free payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer. | | Further discussions with the relevant manager revealed that a financial hardship flag is inputted into the Authority system for the relevant customer account. This creates an automated process in which interest is not applied to any late payments. A Financial Hardship Policy was also put in place that covers this obligation where it explained in detail the criteria for financial hardship and elaborating the offer for payment plan to customers. It is also explained in this policy that no fees or interests are charged as part of the payment plan. The licensee was not compliant with this obligation in the previous audit period, nowever, during the current audit period the licensee implemented the agreed ecommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the | | |
| 130B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(3) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing financial hardship, the licensee must take the customer's | 4 | Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|--|--------------------|----------------------|
| | capacity to pay the bill into account. | | | | |
| | In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods. | | | | |
| 131 | Not used | - | - | - | - |
| 131A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(a) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must consider reducing the amount owing by the customer. | 4 | The following personnel was interviewed: Customer Service Coordinator The following documents were reviewed: Financial Hardship Policy Aqwest has a Financial Hardship Policy which is publicly available and reviewed annually. The policy was last reviewed on the 16 th of March 2023. Section 5 of the policy has reference to debt reduction and outlines the process that Aqwest follows to consider reducing the amount of debt owed by the customer to Aqwest. Further discussions revealed that payment matching is conducted. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| 131B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 30(4)(b) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must review, upon request, how a customer is paying a bill under clause 30(2) and (3) and revise the payment plan or arrangement if the review indicates the customer is unable to meet the obligations. | 4 | Recommendation Not Applicable The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Financial Hardship Policy Aqwest has a Financial Hardship Policy which is publicly available and reviewed annually. The policy was last reviewed on the 16th of March 2023. Section 4 of the policy has reference to payment plans and review of the payment plans to understand if the customer can comply with the payment plan. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 131C | Water Services Code of Conduct (Customer Service StandardI2018 Clause 30(4)(c) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 | 4 | The following personnel was interviewed: — Customer Service Coordinator The following documents were reviewed: — Financial Hardship Policy Aqwest has a Financial Hardship Policy which is publicly available and reviewed annually. The policy was last reviewed on the 16th of March 2023. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | The licensee must provide the specified written information to a customer. | | Section 7 of the policy has reference to useful information that is provided to the customer including payment options, concessions and other financial relief assistance and financial counselling. As this policy is made publicly available this information is available to the customer. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 132 | Not used | - | - | - | - |
| 133 | Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 31(4) & (5) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following information were reviewed: — Aqwest's website: https://aqwest.com.au/your-home/accounts-and-billing/financial-support — Financial Hardship Policy for Water Services July 2023 | A | 1 |
| | The licensee must have written information regarding the payment schemes and other assistance that is available to customers. The information must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge. | | Through discussions with the Customer Service Coordinator and review of information on Aqwest's website, we note that Aqwest has written information about payment schemes and other assistance that is available for customers experiencing payment difficulties and financial hardship. The information is made available on Aqwest's website, and we also confirmed that the information is available to customers in hardcopy free of charge upon request. Furthermore, it was confirmed that this information was available on the website throughout the audit period. An internet archiving tool, The Wayback Machine, was used to confirm this. The licensee was compliant with this obligation throughout the reporting period. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| 133A | Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 32 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances. | 3 | Recommendation Not Applicable The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Report of People in Hardship Hardship Report Ombudsman Complaint Report Interest Calculation Reports Financial Hardship Policy for Water Services Through discussions with the key stakeholders, procedures, and work instructions, we observed that Aqwest have procedures that outline the requirement to not charge interest or fees for late payment of a bill to customers assessed under financial hardship or made any complaint related to non-payment of the bill until it is solved. | A | 1 |
| | | | We sampled 5 accounts and there was no interest or fees charged for late payment of a bill by a customer assessed under financial hardship or made any complaint related to non-payment of the bill until it was solved. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 134 | Water Services Code of Conduct (Customer Service | 3 | The following personnel were interviewed: — Customer Service Coordinator | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| | Standards) 2018 Clauses 33(1)(a)-(c) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must not commence or continue proceedings to recover a debt from a customer if the customer is complying with a payment plan or other arrangement, is being assessed for payment difficulties or is being assessed for financial hardship. | | The following documents were reviewed: Legal Intentions Financial Hardship Policy Clause 33(1) (a)-(c) requires Aqwest not to commence or continue proceedings to recover a debt from a customer if the following specified circumstances applies: (1) A licensee must not commence or continue proceedings to recover a debt from a customer if — (a) the customer is complying with a payment plan or other arrangement entered into under clause 28(2) or 30(2); or (b) the licensee is assessing whether or not the customer is experiencing payment difficulties; or (c) the licensee is assessing, under its financial hardship policy, whether or not the customer is experiencing financial hardship. We reviewed 18 accounts with legal intentions and noted no proceedings commenced on these accounts. The licensee had no activity on this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 134A | Water Services Code of Conduct (Customer Service | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | StandIs) 2018 Clause 33(1)(d)-(e) | | Legal Intentions Financial Hardship Policy | | |
| | OL 16: Clause 4.1.1 | | Clause 33(1) (a)-(e) requires Aqwest not to commence or continue proceedings | | |
| | OL 17: Clause 4.1.1 | | to recover a debt from a customer if the following specified circumstances applies: | | |
| | The licensee must not commence or continue proceedings to recover a debt from a customer if a complaint made by the customer to the licensee or water services ombudsman, which directly relates to the water service charge to which the debt relates, is not resolved by the licensee (or is not determined or is upheld by the ombudsman). | | 1) A licensee must not commence or continue proceedings to recover a debt from a customer if — (d) a complaint made by the customer to the licensee that directly relates to the water service charge to which the debt relates is not resolved; or (e) a complaint made by the customer to the water services ombudsman that directly relates to the water service charge to which the debt relates is not determined or is upheld by the water services ombudsman. Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. There were no activities during the audit period for this specific obligation. Recommendation Not Applicable | | |
| 135 | Water Services Code of Conduct (Customer Service Standards) 2018 Clauses 40(1) | 3 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: | A | 1 |
| | OL 16: Clause 4.1.1 | | List of Restricted Properties 2019-2020 List of Restricted Properties 2021-2022 List of Restricted Properties 2022-2023 | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | OL 17: Clause 4.1.1 | | Restrict and/or Reinstate Water Service Process Map | | |
| | If the licensee has cut off or reduced the rate of flow of water to land under section 95(1)(b) of the Act, the licensee must restore the supply of water if the amount owing is paid, or if the customer enters into a payment arrangement for the amount owing that is satisfactory to the licensee. | | Approved Payment Plan Work Order Enquiry We reviewed ten (10) customer accounts and noted that restrictor was installed but were subsequently removed after full payment or payment plan was entered into with the customer. The licensee was compliant with this obligation during the audit period. Recommendation Not Applicable | | |
| 136 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 40(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 If the licensee has, undersection 95(1)(a), (c), (d) or (e) of the Act, cut off or reduced the flow of water, the licensee must restore the supply of water if the licensee is satisfied that the reason for the | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: List of Restricted Properties 2019-2020 List of Restricted Properties 2021-2022 List of Restricted Properties 2022-2023 Restrict and/or Reinstate Water Service Process Map Approved Payment Plan Work Order Enquiry Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. There was no activity for this obligation during the audit period. | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|---|--------------------|----------------------|
| | disconnection or reduction no longer applies. | | Recommendation Not Applicable | | |
| 137 | Not used | - | - | - | - |
| 137A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must not start a water supply restriction unless the licensee has given the customer a reminder notice (that includes the information specified in clause 35), the water service charge has still not been paid in full, and the licensee has given the following restriction notice. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Restrict and/or Reinstate Water Service Process Map Restriction notices Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. We reviewed nine (9) restriction notices issued to customers and validated the following. Issue date of the restriction notice Restrictor installation date Justification on the restriction notice The tests performed on these accounts did not show any noncompliance from the licence obligation. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| 137B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must not give a customer a restriction notices less than 7 days before the day on which the water supply restriction is proposed to start. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Restrict and/or Reinstate Water Service Process Map Restriction notices Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. We reviewed nine (9) restriction notices issued to customers and validated the following. Issue date of the restriction notice Restrictor installation date Justification on the restriction notice The results of the tests revealed eight (8) samples that complies with the following: A reminder notice and a restriction notice are issued to the customer. Restriction notice is issued at least 7 days before the day on which the water supply restriction is proposed to start. Notice of restriction explains the reason for the water restriction. Notice of restriction informs the customer of the existence and operation of the licensee's complaints procedures mentioned in clause 46. Notice of restriction informs the existence of an Ombudsman under the scheme approved under section 65 providing free-call telephone number contact. Notice of restriction informs the customer of the applicable procedures including costs, for the restoration of the water supply if the water supply restrictions are started. | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | | | And one (1) exception where the restriction notice was issued less than 7 days. AC41140294- Restriction Notice was issued on 28/04/2022 while restriction would take place sometime in the week commencing 02/05/2022. Customer was only given four (4) days' notice instead of seven (7) days' notice. Whilst eighth (8) samples were compliant, there was one (1) exception, hence the licensee was not fully compliant with this obligation during the audit period. Recommendation (2/2023) Aqwest should comply with the license obligation and prevent issuing restriction | | |
| | | | notice of less than 7 days before the day on which the water supply restriction is proposed to start. To ensure that this is consistently applied, Aqwest should implement a second review by another officer to sign off on the restriction notice prior to sending to customers. | | |
| 137C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 36(3) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The restriction notice must include the specified information. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Water Service Process Map Restriction Notices Section 36(3) requires the following information on a restriction notice: (a) explain the reason for the proposed water supply restriction; and (b) advise the customer of the earliest date on which the water supply restriction may start; and (c) inform the customer of the existence and operation of the licensee's complaints procedure mentioned in clause 46; and | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | (d) inform the customer of the procedures available to the customer under the Act as to applying to the water services ombudsman under a scheme approved under section 65 and provide a Freecall telephone number for the office of the water services ombudsman; and (e) inform the customer of the applicable procedures, including any costs, for the restoration of the water supply if the water supply restriction is started. | | |
| | | | Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. | | |
| | | | In reviewing the information on the restriction notice with the specified information required by the Code, we reviewed nine (9) restriction notices on accounts and did not detect any breaches regarding the requirement in clause 36(3). | | |
| | | | The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. | | |
| | | | Recommendation Not Applicable | | |
| 138 | Water Services Code of Conduct (Customer ServI | 3 | The following personnel were interviewed: — Customer Service Coordinator | A | 1 |
| | | | The following documents were reviewed: | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | Standards) 2018 Clause 37(1)(a)-(e) & (h). | | Restrict and/or Reinstate Water Service Process Map V2.0Sampled Accounts | | |
| | OL 16: Clause 4.1.1 | | Section 37(1) (a)-(e) & (h) requires the licensee must not start a water supply | | |
| | OL 17: Clause 4.1.1 | | restriction if the following specified circumstances apply: | | |
| | The licensee must not start a water supply restriction if the specified circumstances apply. | | (a) (1) A licensee must not start a water supply restriction if— (a) the amount owing is less than \$200; or (b) the licensee is assessing whether or not the customer is experiencing payment difficulties; or (c) the licensee is assessing, under its financial hardship policy, whether or not the customer is experiencing financial hardship; or (d) the customer is experiencing payment difficulties or financial hardship and is complying with a payment plan or other arrangement under which the customer has been given more time to pay the bill or to pay arrears; or (e) a complaint made by the customer to the licensee that directly relates to the water service charge is not resolved; or (h) the supply of water is to a place occupied by a tenant and the customer is liable to pay the amount owing. Through discussions with relevant personnel, reviewing sample of accounts, and reviewing relevant policies and procedures, we determined that the water supply restriction does not start if the specified circumstances apply. We reviewed nine (9) accounts and identified no exceptions. Based on the tests performed, the nine (9) accounts met the critic for water restrictions. Clause 37(a)-(e) & (h) did not apply on these samples. The licensee was compliant with this obligation throughout the reporting period. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | Recommendation Not Applicable | | |
| 138A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 37(1)(f)-(g) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must not start a water supply restriction if the specified circumstances apply. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Restrict and/or Reinstate Water Service Process Map V2.0 Sample of accounts We observed the following: Section 37(1) (f)-(g) requires the Aqwest must not start a water supply restriction if following specified circumstances apply: (b) (1) A licensee must not start a water supply restriction if — (a) a complaint made by the customer to the water services ombudsman that directly relates to the water service charge is not determined or is upheld by the water services ombudsman; or (b) the customer has applied for a concession or other financial assistance to which the customer may be entitled and a decision on the application has not yet been made. Through discussions with relevant personnel, reviewing sample of accounts, and reviewing relevant policies and procedures, we determined that the water supply restriction does not start if the specified circumstances apply. We reviewed 9 accounts and did not detect a breach. Aqwest had represented that no customers were being assessed for financial hardship at the time of restriction. After a property is restricted, the customer will contact Aqwest and then advise that they are in hardship and there was no pending concessions or financial assistance at the time of restriction. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | | | Based on the tests performed, the nine (9) accounts met the criteria for water restrictions. Clause 37(1)(f)-(g) did not apply on these samples. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 138B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 38 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not start a water supply restriction on or during the specified times. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Restrict and/or Reinstate Water Service Process Map V2.0 Sample of accounts Section 38 requires Aqwest must not start a water supply restriction if the following specified circumstances apply: A licensee must not start a water supply restriction — (c) on a Friday, Saturday, Sunday or public holiday or on the day before a public holiday; or (d) on a day on which a total fire ban has effect under the Bush Fires Act 1954 in the area of the State in which the place at which water is supplied to the customer is located; or (e) after 3pm on any day. Through discussions with relevant personnel, reviewing 9 samples of accounts, and reviewing relevant policies and procedures, we determined that the water supply restriction does not take place on a Friday, Saturday, Sunday or public holiday or on the day before a public holiday. Restriction action is not to be taken after 3 pm on any day. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | There were no water restrictions outside the specified timeline as per Section 38. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 139 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 39 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must not, under section 95(1)(b) or (2) of the Act, reduce the rate of flow of water to a customer to below 2.3 litres each minute. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Investigate Poor Pressure & Flow v11.0 Dissection or reduction in rate of flow etc. (1) A licensee may cut off, reduce the rate of flow of or refuse a supply of water to land if — (f) (b) water service charges (including interest on overdue amounts) due to the licensee for a water service provided in respect of the land remain unpaid for 30 days after they become due. (2) A licensee may reduce the rate of flow of a supply of water to land if satisfied that it is necessary to do so to prevent the waste. of water on or associated with the land. Through discussions with relevant personnel, reviewing 9 sample of accounts, and reviewing relevant policies and procedures, we determined that the rate of flow of water has not been reduced to a customer to below 2.3 litres each minute. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | Recommendation Not Applicable | | |
| 140 | Not use | | | | |
| 141 | Not use | | | | |
| 142 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(4) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee (other than the Water Corporation) must restore a water supply to land within the specified timeframe, unless the licensee and customer expressly agreed otherwise. | 3 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: List of Restricted Properties 2019-2020 List of Restricted Properties 2021-2022 List of Restricted Properties 2022-2023 Restrict and/or Reinstate Water Service Process Map Approved Payment Plan Work Order Enquiry Policy 1.32 Restrict the Flow of Water Section 37(1) (a)-(e) & h requires Aqwest must not start a water supply restriction the following specified circumstances apply: (g) (1) A licensee must not start a water supply restriction if — (f) the amount owing is less than \$200; or (g) the licensee is assessing whether or not the customer is experiencing payment difficulties; or (h) the licensee is assessing, under its financial hardship policy, whether or not the customer is experiencing financial hardship; or (i) the customer is experiencing payment difficulties or financial hardship and is complying with a payment plan or other arrangement under which the customer has been given more time to pay the bill or to pay arrears; or | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | (j) a complaint made by the customer to the licensee that directly relates to the water service charge is not resolved; or (i) the supply of water is to a place occupied by a tenant and the customer is liable to pay the amount owing. Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. We reviewed ten (10) accounts where water restrictions have been applied and subsequently lifted. We did not detect any breaches regarding the restoration of water. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 143 | Not use | - | - | - | - |
| 144 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 41(6) WL 2: Version 10: Clause | 3 | The following personnel were interviewed: — Performance and Reporting Analyst The following documents were reviewed: — Yearly Summary of Restrictors2022-2023 — Resolution of Customer Debt Recovery | A | 1 |
| | 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee (other than the Water Corporation) must ensure that there is a | | Clause 41(4) stated that: "A licensee other than the Water Corporation must restore a water supply — (a) if the restoration event occurs before 3 pm on a business day, by the next business day; and (b) if the restoration event occurs at any other time, within the next 2 business days, unless the licensee and customer expressly agree otherwise". | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | 90% compliance rate with clause 41(4) in any 12-month period ending" on '0 June. | | Through reviewing the resolution of customer debt recovery, it was identified that due to the "COVID-19 economic and health relief package" implemented by the State Government, water restriction has not been undertaken before 1st July 2021. In addition, we examined the summary of restrictors and identified that all water restoration cases are compliant with the obligation except one meter tampering case. The compliance rate has exceeded more than 90%. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 144A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(1) WL 2: Version 10: Clause 4.1.1 | 3 | The following personnel were interviewed: Coordinator Works Management The following documents were reviewed: Promapp: Customer Notifications Planned Outages Register Water Interruption Notices | A | 1 |
| | WL 2: Version 11: Clause 4.1.1 The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption. | | Aqwest maintains a Planned Outage Register which includes the locations and addresses where planned works are to be performed. The register also includes the notice periods. We tested a sample of 10 such planned works and checked if service interruption notices were given to the customers and given at least 48 hours prior to the service interruption. Aqwest uses a template card called <i>Water Interruption Card</i> which includes the details of the service interruption such as the affected area, the planned outage date and other information to customers on what actions to take. At the bottom | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | of the card is the date that Aqwest indicates the day on which the notice is given. We further enquired how we can establish in fact if these notices were delivered on that date. Although the notice dates on the notices are within the 48 hours timeframe, there is no further evidence to support that the notice was actually delivered to the customer on that date. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 144B | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 43(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The notice of any planned service interruption must be given within the prescribed timeframes. | 3 | The following personnel were interviewed: Coordinator Works Management The following documents were reviewed: Promapp: Customer Notifications Planned Outages Register Water Interruption Notices Aqwest maintains a Planned Outage Register which includes the locations and addresses where planned works are to be performed. The register also includes the notice periods. We tested a sample of 10 such planned works and checked if service interruption notices were given to the customers and given at least 48 hours prior to the service interruption. Aqwest uses a template card called Water Interruption Card which includes the details of the service interruption such as the affected area, the planned outage | В | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|---|--------------------|----------------------|
| | | | date and other information to customers on what actions to take. At the bottom of the card is the date that Aqwest indicates the day on which the notice is given. We further enquired how we can establish in fact if these notices were delivered on that date. Although the notice dates on the notices are within the 48 hours timeframe, there is no further evidence to support that the notice was actually delivered to the customer on that date. The licensee was compliant with this obligation throughout the period. Recommendation | | |
| | | | Not Applicable | | |
| 144C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 44(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have policies, practices and procedures for dealing with and minimising the impact of a burst, leak or blockage in its water supply works or | 4 | The following personnel were interviewed: Coordinator Networks The following documents were reviewed: Promapp: Repair a Broken Water Main Promapp: Planning Process for Scheduled Work Orders Contracted Service Delivery 1 Discoloured Water Contracted Service Delivery 2 Pressure Complaints Contracted Service Delivery 4 Service Maintenance Contracted Service Delivery 5 Water Main Repair Contracted Service Delivery 6 Faulty Stopcock Contracted Service Delivery 15 Water Meter Replacement Contracted Service Delivery 193 Investigation We reviewed the procedures Aqwest has in place to deal with bursts, leaks, | A | 1 |
| | in its water supply works or sewerage works. | | blockages, and other matters with water supply and note that the procedures | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | | | and tasks cover how to address leaks, but we could not determine if it covers bursts and blockages. Further queries revealed that leaks and bursts are treated the same and it is the severity of the impact that drives the response. In this regard, Aqwest's procedures do not distinguish the actions that will be followed based on the severity of the issue; it does not describe specific actions that should be taken to handle and treat a leak and burst. We reviewed Aqwest's Contracted Service Delivery Task 5 – Water main Repair and note the following: a) attendance requirements are included based on level of risk. b) the actions that will be taken to rectify a leak is set out but there are no specific actions for bursts. c) potential impact on customers, other persons, properties, and the environment and ways to minimise such impact. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | | |
| 144D | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 44(2) WL 2: Version 10: Clause 4.1.1 | 4 | The following personnel were interviewed: — Coordinator Networks We reviewed the procedures Aqwest has in place to deal with bursts, leaks, blockages, and other matters with water supply and note that the procedures and tasks cover how to address leaks, but we could not determine if it covers bursts and blockages. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 | | Further queries revealed that leaks and bursts are treated the same and it is the severity of the impact that drives the response. | | |
| | The policies, practices and procedures under clause 44(1) must deal with the prescribed matters. | | In this regard, Aqwest's procedures do not distinguish the actions that will be followed based on the severity of the issue; it does not describe specific actions that should be taken to handle and treat a leak and burst. We reviewed Aqwest's Contracted Service Delivery Task 5 – Water main Repair and note the following: a) attendance requirements are included based on level of risk. b) the actions that will be taken to rectify a leak is set out but there are no specific actions for bursts. c) potential impact on customers, other persons, properties, and the environment and ways to minimise such impact. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 144E | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 45 | 3 | The following personnel were interviewed: — ICT Coordinator — Coordinator Treatment | A | 1 |
| | WL 2: Version 10: Clause 4.1.1 | | The following documents were reviewed: — EmergencyLineCallflow2023 - Call Centre Script | | |
| | WL 2: Version 11: Clause 4.1.1 | | Promapp: Monitor Incoming Phone Calls Through discussions, we identified that Aqwest has a 24-hour call centre for | | |
| | The licensee must provide a 24-hour information line by means of which, at the | | customers to reach out. During business hours, the calls are taken by Aqwest and during outside business hours, the calls are redirected to a contracted out | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | cost of a local telephone call (excluding mobile telephones), a customer can notify the licensee of emergencies and faults, and get information about the reason for, and the expected duration of, any unplanned service interruption. | | external call centre that receives the calls, notes down the customer requests and if urgent, Aqwest will be contacted. There is a structured script that call centre staff need to follow when responding to calls. This script is followed by the external call centre as well. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 145 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must have a written complaints procedure in relation to investigating and dealing with complaints of customers about the provision of water services by the licensee or a failure by the licensee to provide a water service. | 4 | The following personnel were interviewed: Business Services Administrator The following documents were reviewed: Complaints Management Procedure Manual has the following sections: I – Introduction Processing Complaints Resolving and Responding to Complaints Training and References Customer Complaint Process ERA Guideline and AS/NZS 10002-2014 (ERA Customer Complaint Guidelines – December 2016) International Standard ISO 10002 2018 – Quality Management – Customer Satisfaction- Guidelines for Complaints Handling in Organisations. Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures clearly outlining the requirements. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | | | We reviewed Aqwest's website and noted that Aqwest promises customers a quick and effective resolution free of charge and promises that complaints will be investigated objectively, equitably and in an unbiased manner. It further promises that all complaints will be investigated and resolved within 15 business days of reporting it. Customers can lodge their complaints by: Phoning Aqwest on phone numbers provided on their website. Using the online complaints form. Writing to Aqwest. Aqwest also provides speech or hearing assistance and an interpreter service. Feedback on complaints will be provided to customers by phone, email or in writing. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 146 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(2) WL 2: Version 10: Clause'4.1.1 WL 2: Version 11: Clause 4.1.1 | 3 | The following personnel were interviewed: Business Services Administrator The following documents were reviewed: ERA Guideline and AS/NZS 10002-2014 (ERA Customer Complaint Guidelines December 2016) International Standard ISO 10002 2018 – Quality Management – Customer Satisfaction- Guidelines for Complaints Handling in Organisations. | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's guidelines (if any). | | Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. The Annual Compliance Report for the 30 June 2021 Financial Year noted that the 2020 Operating Licence Audit identified the complaints procedure had aspects that did not comply with AS/NZS 1002-2014 for the period 1 July 2020 to 31 March 2021. Components that did not comply related predominantly to the protection of staff. There was no impact on the management of customer needs. Aqwest increased focus on complaint management in April 2020 and self-identified gaps that needed to be addressed. Not all gaps had been addressed at the time of the audit. A project was undertaken to address gaps in procedures and documents. Complaint procedures has been developed and now include a reference to the standard using the minimum standards of AS10002-2014 and the ERA's guidelines. The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. Recommendation Not Applicable | | |

| cence Reference & ummary of Licence bligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| ater Services Code of conduct (Customer Service andards) 2018 Clause 5(3) L 2: Version 10: ause'4.1.1 L 2: Version 11: Clause 1.1 ne licensee's complaints ocedure must provide for e matters specified in lation to lodgement of complaints, responding to complaints, dispute solution arrangements. | 4 | The following personnel were interviewed: — Business Services Administrator The following documents were reviewed: — ERA Guideline and AS/NZS 10002-2014 (ERA Customer Complaint Guidelines – December 2016) — International Standard ISO 10002 2018 – Quality Management – Customer Satisfaction- Guidelines for Complaints Handling in Organisations. Through discussions with key stakeholders and a thorough examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| ot used | - | - | - | - |
| ater Services Code of conduct (Customer Service andards) 2018 Clause 5(4) L 2: Version 10: Claus' 1.1 L 2: Version 11: Clause | 3 | The following personnel were interviewed: - Business Services Administrator The following documents were reviewed: - Complaints Management Procedure Manual has the following sections: 1. Introduction 2. Processing Complaints 3. Resolving and Responding to Complaints | A | 2 |
| L 2: \ 1.1 | | | Version 10: Claus' 1. Introduction 2. Processing Complaints 3. Possibling and Responding to Complaints | Version 10: Claus' 1. Introduction 2. Processing Complaints 3. Resolving and Responding to Complaints 4. Complaints Reporting |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | The licensee's complaints procedure must list the procedures available to the customer under the Act as to applying to the water services ombudsman or making an appeal from, or applying for a review of, the decision that gave rise to the complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k). | | Customer Complaint Process ERA Guideline and AS/NZS 10002-2014 (ERA Customer Complaint Guidelines – December 2016) International Standard ISO 10002 2018 – Quality Management – Customer Satisfaction- Guidelines for Complaints Handling in Organisations. Through discussions with key stakeholders and examination of procedures and work instructions, it was observed that Aqwest has established procedures outlining the requirements. The Annual Compliance Report for 30 June 2021 noted that the 2020 Operating Licence Audit identified that the Aqwest website did not include all mechanisms for complaint or appeal for the period July 2020 to December 2020. The effect on customers was that information provided was incomplete. The cause was an oversight when creating the new website. Once the matter was discovered, the website was updated. The requirement to include these matters is now included in the website compliance checklist which is used as a regular check on information provided through the website. Aqwest was fully compliant with this requirement from 16 February 2021. The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. Recommendation Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|---|--------------------|----------------------|
| 149 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 46(5) WL 2: Version 10: Claus' 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee's complaints procedure must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge. | 4 | The following personnel were interviewed: — Business Services Administrator The following information were reviewed: — Complaint Resolution Procedure on Aqwest's website: "Customer complaint resolution" https://aqwest.com.au/contact-us/customer-complaint-resolution — Aqwest's website: "Make a complaint". — https://aqwest.com.au/forms/help-and-feedback-forms/make-a-complaint — Customer Complaint Policy Through discussion with the Business Services Administrator and review of Aqwest's website including webpage history along with the policies and procedures, we note that the complaints procedure was available on the website and a hardcopy was available to be provided to customers upon request, at no charge. In addition, there is an online form that customers can fill and submit through the website to file a complaint. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 149A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 47 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 4 | The following personnel were interviewed: — Business Services Administrator The following documents were reviewed: — Complaint Response Template 2023 — Complaint Resolution Procedure on Aqwest's website: "Customer complaint resolution" https://aqwest.com.au/contact-us/customer-complaint-resolution — Promapp: Respond to Ombudsman and SAT Complaints | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer, accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman. | | Aqwest's complaint resolution procedure on its website mentions that customers can refer to water service ombudsman if a complaint has not been resolved. The website contains the link along with details of call free number of water ombudsman. In addition, the Complaints Response Template also includes the same information. Our review of 5 complaints identified 2 breaches that did not comply with Clause 47 as the Aqwest responses to the customer did not include information that clearly articulates customer's right to appeal to the Ombudsman for review if needed in situations where the customers are not satisfied with Aqwest handling of the complaint. The details of the two (2) exceptions noted are as follow: On the first exception identified, no written response was provided by Aqwest. The complaint was resolved via a verbal conversation with the customer but the right to appeal to the Ombudsman was not articulated to the customer. On the second exception identified, the customer was responded via email, but the email did not include any information about the right to appeal to the Ombudsman. The licensee was not compliant with this obligation during the audit period. Recommendations (3/2023) Whilst Aqwest has an existing template that embeds the statement about the customers right to appeal to the Ombudsman, we recommend that Aqwest consistently utilise this template when responding to customers upon the resolution of complaints. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | | | To ensure that Aqwest staff consistently use the template when responding to customers, it should implement an internal review or signoff procedure where the response is reviewed by another officer prior to sending to customer. | | |
| 150 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 48(1) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must provide a customer with the specified services on request and at no charge. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: We observed the following: Through discussions and a review of Aqwest's website, we noted that Aqwest provide the following services free of charge: Services for account, payment and general enquiries for use by customers with hearing or speech impairment (National Relay Service). Interpreter services for account, payment and general enquiries (Translating and Interpreting Service); and A large-print version of any of Aqwest's publicly available information (Large print documents) i.e. A3 printed documents. Aqwest's bills also indicate the hearing or speech impairment and interpreter services they provide to customers. Aqwest provide customers with their personal account information for each of the properties they own. Customers can also obtain their personal account information via email or by phone. Aqwest only provide personal information to a customer which relates to the specific customer or an authorised third party. | A | 1 |
| | | | services they provide to customers. Aqwest provide customers with their personal account information for each of the properties they own. Customers can also obtain their personal account information via email or by phone. Aqwest only provide personal information to a customer which relates to the | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | Recommendations Not Applicable | | |
| 151 | Not used | - | - | - | - |
| 152 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 48(2) OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must make available to each customer, at no charge, the customer's personal account information including information about bills previously issued to the customer and about the quantity of water supplied to, or wastewater discharged by, the customer in previous billing periods. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Sample Water Bills Through our examination of key documents and discussions with key stakeholders, the following was observed: Each bill contains customers personal information as well as the customers personal account information. Aqwest, through the "My Water" program, provide customers with their personal account information for each of the properties they own. Customers can also obtain their personal account information via email or by phone. Telephonic requests will be provided in accordance with the requirements of the "Security Policy Guidelines". The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 153 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must make the prescribed information publicly available. | 4 | The following personnel were interviewed: General Manager Business Services The following documents were reviewed: Aqwest's website: "Residential water prices" https://aqwest.com.au/your-home/accounts-and-billing/residential-water-prices Aqwest's website: "Commercial water prices" https://aqwest.com.au/your-business/commercial-water-prices Aqwest's website: "Pay a bill" https://aqwest.com.au/your-home/accounts-and-billing/pay-a-bill Aqwest's website: "Concessions" https://aqwest.com.au/your-home/accounts-and-billing/concessions Aqwest's website: "Accessibility" https://aqwest.com.au/contact-us/accessibility Aqwest's website: "Manage your account" https://aqwest.com.au/your-home/accounts-and-billing/manage-your-account Aqwest's website: "Water service responsibility" https://aqwest.com.au/community-and-education/managing-your-water/water-services-responsibility Aqwest's website: "Water quality" https://aqwest.com.au/your-business/water-quality Aqwest's website: "Saving water in your home&garden" https://aqwest.com.au/community-and-education/managing-your-water/saving-water-in-your-home-garden Aqwest's website: "Outages and faults" https://aqwest.com.au/outages-and-faults Through reviewing Aqwest website and discussions with relevant personnel, we determined that the following prescribed information in 49(1)(h) are not publicly available: | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | | | (h) that if the customer is offered a payment plan or other arrangement giving the customer more time to pay the bill or to pay arrears, the licensee's power as mentioned in paragraph (g) can only be exercised if – the customer has not accepted the offer within the period of 7 days after the day on which it was made: or having entered such a plan or other arrangement, the customer does not comply with it. The condition in 49(1)(h) is only enlivened when the customer fails to pay the required debt to Aqwest and the customer is provided more time to pay the bills or to pay arrears. If the customer does not accept the offer of arrangement within 7 days or does not comply with the arrangement executed, the Aqwest can exercise the power as mentioned in paragraph 49(1)(g). Aqwest's approach is to negotiate an outcome that is mutually acceptable which factors in the customer's specific circumstances when engaging with the customers who are having payment difficulty. This interaction with the customer is agreed and finalised in the initial conversation/communication. Aqwest's does not offer a payment plan without the customer's agreement and then advise them that they must accept the offer within 7 days. Accordingly, Aqwest website does not have information, which states it may restrict supply if the customer does not accept an offer of a payment plan within 7 days. Aqwest's approach is customer-centric, we consider the Code in this regard to be prescriptive and requires the requisite information to be provided publicly. The licensee was not compliant with this obligation throughout the reporting period. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | | | Recommendation (4/2023) Aqwest should update the website to clearly specify the statement 'it may restrict supply if the customer does not accept an offer of a payment plan within seven (7) days.' | | |
| 154 | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must ensure that the specified information about bills may be obtained from its website. | 3 | The following personnel were interviewed: General Manager Business Services The following documents were reviewed: Aqwest's website: "Bill Review" https://aqwest.com.au/document-search/customer-information/2019/bill-review-information-standard Aqwest's website: "Manage your account" https://aqwest.com.au/your-home/accounts-and-billing/manage-your-account Aqwest's website: "Meter Reading Request (Settlement)" https://aqwest.com.au/document-search/customer-information/2019/meter-reading-request-settlements Aqwest's website: "Meter Reading Request (Tenant)" https://aqwest.com.au/document-search/customer-information/2019/meter-reading-request-tenant Aqwest's website: "Test my meter" https://aqwest.com.au/forms/billing-enquiries-and-requests/test-my-meter Aqwest's website: "Review my bill" https://aqwest.com.au/forms/billing-enquiries-and-requests/review-my-bill Aqwest's website: "Make a complaint" https://aqwest.com.au/forms/help-and-feedback-forms/make-a-complaint Water Services Code of Conduct (Customer Service Standards) 2013 Clause 37(1)(2); and Aqwest website: Water Corporation Meter Readings How to-Read Your Meter Water Corporation Meter Readings - Estimated meter reads | A | 2 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | Water Corporation Property Management - Request a meter reading Water Corporation - Contact Us - Account enquiries. Customer & service commitments Clause 49 (2) states, inter alia, that: A licensee must ensure that the following information about bills may be obtained from its website — (b) that in the case of a metered water service, a customer may request a meter reading and bill to determine the outstanding charge for a period that is not the same as the usual billing cycle; (c) that in the case where a customer disputes an estimate on which a bill is | | |
| | | | based, the customer may request a meter reading (if the water service is metered and the meter is operable) and in any event a revised bill and that if the customer so requests, information about the fees that apply; (d) that a customer may request, in accordance with the regulations mentioned in section 79(3)(b), the testing of a meter and that if the customer so requests, information about the fees that apply and when the fees may be reimbursed in accordance with the regulations mentioned in section 79(3)(c). | | |
| | | | Our review of Aqwest's public website identified: It does provide that a customer can request a meter test and information regarding testing charges and reimbursement; and Estimated reads information does state the customer may request a meter reading. | | |
| | | | The licensee was not compliant with this obligation in the previous audit period, however, during the current audit period the licensee implemented the agreed recommendations from the previous audit period. Hence, no recommendation is applicable as the licensee became compliant with this obligation during the current audit period. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| 154A | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 49(3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must ensure that its website contains a link to the current version of this code appearing on the website that is maintained by or on behalf of the Western Australian Government and that | 4 | Recommendation Not Applicable The following personnel were interviewed: — Business Services Administrator The following documents were reviewed: — Aqwest's website: "Water industry regulation" — https://aqwest.com.au/about-aqwest/water-industry-regulation — Western Australian Legislation website: "Water Services Code of Conduct" https://www.legislation.wa.gov.au/legislation/statutes.nsf/law_s4880.html We checked Aqwest's website including webpage history and confirmed that it contains a link to the current version of the code published on the Western Australian Legislation website maintained by the government where the current version of legislations is made publicly available. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 154B | provides public access to electronic versions of Western Australian legislation. Water Services Code of Conduct (Customer Service | 1 | The following personnel were interviewed: — Coordinator Works Management | В | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| | Standards) 2018 Clause 51(1) & (3) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 The licensee must maintain an up-to-date preserved supply register for the purposes of Part 9 of the Code if the licensee meets the criteria in clause 51(2). The register must record the prescribed information in clause 51(3) if the criteria in clause 51(2) applies to the licensee. | | The following documents were reviewed: — Preserved Supply Register — RiskWizard Screenshot on Procedures to be followed. Through discussions and enquiries, Aqwest indicated that there are no customers on the preserved supply register. Hence, we assessed if there are procedures to address this requirement if the need arises and note that Aqwest has in place some tasks in RiskWizard that are in line with the requirement including the responsible officers. Furthermore, we reviewed preserved supply register and found that although it is blank, the register template contains columns to populate the required information as needed, which is the name of the person and the supply address. Although the tasks to be performed if the need to address preserved supply have been identified, we did not come across a formal procedure/process including these requirements. The licensee had no activity for this obligation throughout the period. Recommendation Not Applicable | | |
| 154C | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 52 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 The licensee must not, under section 95(1)(b) of | 1 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Preserved Supply Register — RiskWizard Screenshot on Procedures to be followed. Through enquiries, Aqwest indicated that there are no customers on the preserved supply register. Hence, we assessed if there are procedures that address the rate of flow will not be reduced to addresses recorded on the preserved supply register. | В | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | the Act, reduce the rate of flow of a supply of water to a supply address recorded on the preserved supply register. | | We recognise that there are no customers on the preserved supply register. Although Aqwest has some tasks relating to this obligation listed within RiskWizard, we did not come across any formal procedure/process that would restrict reducing the rate of flow for any addresses recorded on the preserved supply register, if ever needed. The licensee had no activity for this obligation throughout the period. Recommendations Not Applicable | | |
| 154D | Water Services Code of Conduct (Customer Service Standards) 2018 Clause 53 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 Despite clause 43(3), in the case of a service interruption that will affect a supply address recorded on the preserved supply register, the notice required by clause 43(1) must be sent by post or delivered to that supply address. | 1 | The following personnel were interviewed: Coordinator Works Management The following documents were reviewed: RiskWizard Screenshot on Procedures to be followed. Through enquiries, Aqwest indicated that there are no customers on the preserved supply register. Hence, we assessed if there are procedures to address the requirement to send the notice to such addresses either by post or delivered to that address and note that this requirement was included in the RiskWizard tasks. However, we did not come across a formal procedure relating to this requirement. The licensee had no activity for this obligation throughout the period. Recommendation Not Applicable | В | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| 155 | Water Services Act Section 12 | 4 | The following personnel were interviewed: - Coordinator Works Management | A | 1 |
| | WL 2: Version 10: Clause 4.2.1 WL 2: Version 11: Clause 4.2.1 The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Finding) Regulation 2014. | | The following documents were reviewed: Invoices – Standing Charges #ERA 1000340, #ERA 1002665, #ERA 1001323, #ERA 1001542, #ERA 1001819, #ERA 1000067, #ERA 1002458, #ERA 1000582, #ERA 102594, #ERA 1002137, #ERA 1000855, #ERA 1003127, #ERA 102451 Invoices – Annual Licence Charge #ERA 1000181, #ERA 1001024, #ERA 1002355 Licence Fee Work Instruction ID#48853169 Invoices – Annual Licence Charge #ERA1000722, #ERA1001651 Invoices – Standing Charges #ERA102638, #ERA100387, #ERA100631, #ERA1000902, #ERA1001313, #ERA1001521, #ERA1001810 The Economic Regulation Authority (Licensing Funding) Regulations 2014 required Aqwest to pay the ERA an annual licence fee as well as a Standing Charge fee for the audit period. The ERA could also charge Aqwest specific charges under the Regulations. We confirmed that there were no specific charges during the audit period. We obtained the invoices and confirmed that the annual licence fees were paid each year of the audit scope period. We also reviewed the invoices for the standing charges each year. We found all annual and standing charges were paid within the allocated due date as stated in the invoice. The licensee was compliant with this obligation throughout the reporting period. Recommendation | | |
| | | | Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|---|--------------------|----------------------|
| 156 | Not used | - | - | - | - |
| 157 | Not used | - | - | - | - |
| 158 | Not used | - | - | - | - |
| 159 | Water Services Act Section 12 | 4 | The following personnel were interviewed: — General Manager Business Services | NP | NR |
| | WL 2: Version 10: Clause 4.1.2 | | Through discussion with the relevant manager, it was revealed that no direction was given by the ERA in relation to a breach of applicable legislation throughout | | |
| | WL 2: Version 11: Clause 4.1.2 | | the audit period. A procedure would need to be constructed if Aqwest were to receive a direction from ERA. | | |
| | The licensee must comply with a direction from the | | The licensee had no activity for this obligation for the period. | | |
| | ERA in relation to a breach of applicable legislation. | | Recommendation Not Applicable | | |
| 159A | Not used | - | - | - | - |
| 160 | Water Services Act Section | | The following personnel were interviewed: | A | 1 |
| | 12 | | Management Accountant | | |
| | WL 2: Version 10: Clause | | The following documents were reviewed: | | |
| | 4.6.1 | | Aqwest Annual Report 2021-2023 | | |
| | WL 2: Version 11: Clause 4.6.1 | | Aqwest's Annual reports for the past three financial years, including the attached financials, were analysed to determine if they have been independently | | |
| | The licensee and any related body corporate | | reviewed and assessed for non-compliances with accounting standards. | | |
| | must maintain accounting | | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | records that comply with standards issued by the Australian Accounting Standards Board or equivalent International Accounting Standards. | | The Office of the Auditor General (OAG) had audited the financial report. This was included in the Annual report and in each instance the OAG was satisfied that these were prepared in alignment with the relevant accounting standards. No issues identified. The licensee was compliant with this obligation throughout the reporting period. Recommendations Not Applicable | | |
| 161 | Water Services Act Section 12 WL 2: Version 10: Clause 5.2.1 WL 2: Version 11: Clause 5.2.1 The licensee must comply with any individual performance standards prescribed by the ERA. | 3 | The following personnel were interviewed: Customer Service Coordinator The following obligations have been identified as exceptions and therefore impact the compliance status of obligation 161: Obligation 190, section 1.2.1 Obligation 190, section 6.1.1 The following personnel were interviewed: Manager Asset Lifecycle The following documents were reviewed: Post Budget Strategic Asset Plan Aqwest Network Hydraulic Model Update and Analysis Pressure and Flow Operations and Maintenance Control Procedures Pressure Complaints from the Complaints Register Minimum Pressure 2022 Screenshot Pressure and Flow Logger Data Each year a hydraulic modelling tool is used to calculate system performance both current and predicted. The model is accompanied by a report detailing likely gaps in infrastructure performance. The model is developed and | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | | | periodically reviewed under the guidance of the appropriate standards set out in schedule 2 of the licence. | | |
| | | | The modelling based on the most recent review has indicated that the network is generally sufficient to meet existing demands and forecast future demands. The review of the model included the review of pressure and flow loggers which provide a reading at 15-minute intervals. | | |
| | | | Through discussions with the relevant Officer, it was identified that flow and pressure ratings are monitored through customer complaints. Temporary pressure loggers are also used for monitoring purposes prior to a review of the hydraulic model or to monitor areas in which booster pumps have been implemented. An extract from the complaints register identified 11 complaints relating to pressure or flow. It was assessed that these instances were resolved appropriately and did not have a significant impact to customers. | | |
| | | | Furthermore, Pressure and Flow Operations and Maintenance Control Procedures outlines the relevant standards, outstanding and closed complaints, and links to process maps. The process maps within this document includes investigating poor pressure and flow, booster pump inspections and digital logger management. | | |
| | | | As there were no significant incident where pressure and flow were identified as being outside the standards, there was no requirement by Aqwest to notify customer or the ERA. | | |
| | | | The licensee was compliant with this obligation throughout the reporting period. | | |
| | | | Recommendation Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| 162 | Water Services Act Section 12 WL 2: Version 10: Clause 5.3.4 WL 2: Version 11: Clause 5.3.4 The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit. | 4 | The following personnel were interviewed: Coordinator Risk & Compliance The following documents were reviewed: Compliance Register Risk Management Framework V4.0 Risk Management Process Map V3.0 Assess Compliance Risk Process Map V17.0 Through discussions, it is indicated that Aqwest understands its obligations to cooperate with the independent expert and comply with the ERA's audit and review guidelines for operational audits. It was reviewed that Aqwest has developed a risk management framework to construct the processes for implementing risk management. Controls are put in place and risk assessment tool (RiskWizard) is adapted to identify, analyse and evaluate its compliance risks. Compliance register is then extracted from RiskWizard to assist auditors in performing audits. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 163 | Water Services Act Section 12 WL 2: Version 10: Clauses 4.7.1(a), (b), (c) WL 2: Version 11: Clauses 4.7.1(a), (b), (c) The licensee must report to the ERA, in the manner prescribed, if a licensee is under external administration or there is a change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations. | 2 | The following personnel were interviewed: General Manager Business Services The following documents were reviewed: Independent Auditor's Report for 2021, 2022 and 2023 We obtained the audited financial statements for 2021 to 2023 and confirmed that these were issued with unqualified audit opinions. The Office of the Auditor General audited the financial statements. As per the Office of the Auditor General's opinion, the financial reports comply with Australian Accounting Standards. Through discussions with relevant personnel, we confirmed that Aqwest, at no time, was under external administration during the audit period and that Aqwest did not experience a material change to its corporate, financial, or technical circumstances. The licensee had no activity for this obligation throughout the period. Recommendation Not Applicable | | NR |
| 164 | Not used | - | - | - | - |
| 165 | Water Services Act Section 12 WL 2: Version 10: Clause 4.8.1 WL 2: Version 11: Clause 4.8.1 | 4 | The following personnel were interviewed: Coordinator Risk & Compliance The following documents were reviewed: Screenshot of content manager screen ERA Correspondence Register #48799687 ERA correspondence requesting reporting information 19 April 2021 - #115090628 ERA correspondence requesting reporting information 30 March 2022 - #135162277 | Α | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
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| | The licensee must provide the ERA specified information relevant to the operation of the licence or the licensing scheme, or the performance of the ERA's function under the Act in the manner and formed by the ERA. | | Type 1 Obligation Reporting Work Instruction #58569594 Annual ERA compliance Report Work Instruction #49600224 Annual Compliance Reports #100919011 & #120202943 Performance Reporting Work Instruction #48505167 Submission of annual performance data #128703374 Through discussions, Aqwest identified multiple licence obligations which require the provision of information (such as Obligations 4, 7, 8, 9, 163 & 171) to the ERA. Aqwest identified the following information/reporting to be provided to the ERA as per the requirements of the Water Compliance Reporting Manual and the National Performance Framework ('NPF'): Type 1 Obligation Reporting Annual Compliance Reports Performance Reporting – submission of data National Performance Report – Audit To ensure compliance with this obligation, Aqwest has developed work instructions to provide step-by instructions for Type 1 Obligation reporting and compliance reporting, as well as work instructions for annual performance reporting requirements. A compliance report is required to be submitted to the ERA by 31 August each year, and an annual performance report is no later than 31 October each year. Aqwest acknowledges it may be required to provide additional information to the ERA outside the requirements of the reporting manual, NPF(National Performance Framework) and specific licence obligations. These requests for information along with other ERA correspondence are recorded in the ERA correspondence register. The provision of information to the ERA is a core function of the Aqwest's Regulation and Compliance Team. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | | | Our review of the correspondence between Aqwest and the ERA concerning the submission of Type 1 Obligation Reporting, Annual Compliance Reports and Performance Reporting – submission of data, revealed that the submissions are in compliance with the required timeframes. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 166 | Not used | - | - | - | - |
| 167 | Water Services Act Section 12 WL 2: Version 10: Clause 4.8.2 WL 2: Version 11: Clause 4.8.2 The licensee must provide the ERA with the data required for performance reporting purposes that is specified in the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework that apply to the licensee. | 4 | The following personnel were interviewed: Coordinator Risk & Compliance The following documents were reviewed: Screenshots for evidence of submission NPR report from financial year 2019-2020 to 2022-2023 Aqwest Water, Sewerage and Irrigation Licences Report 2021, 2022, 2023 Aqwest Submission of Report Email ERA Acknowledgement of Receipt Emails Water, Sewerage and Irrigation Licence Performance Reporting Handbook It was identified that submissions of NPR reports were completed for each fiscal year, beginning from 2019-2020 to 2022-2023. The reports have the relevant data required and are completed as per the Water, Sewerage and Irrigation Licence Performance Reporting Handbook. Aqwest provides the relevant reporting datasheets to the ERA and sends via Email by the Executive Assistant. No issues identified. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | | | Recommendation Not Applicable | | |
| 168 | Water Services Act Section 12 WL 2: Version 10: Clauses 3.8.1 and 3.8.2 WL 2: Version 11: Clauses 3.8.1 and 3.8.2 Subject to clause 3.8.3, the licensee must publish within the specified timeframe any information that the ERA has directed the licensee to publish under clause 3.8.1. | 4 | The following personnel were interviewed: — General Manager Business Services Through discussion with the relevant manager, it was revealed that no information was directed by the ERA to be published throughout the audit period. Therefore, no further testing was conducted. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 169 | Water Services Act Section 12 WL 2: Version 10: Clause 3.7.1 WL 2: Version 11: Clause 3.7.1 Unless otherwise specified, all notices must be in writing. | 4 | The following personnel were interviewed: General Manager Business Services The following documents were reviewed: Customer Notifications Process Map V10.0 Through discussions with General Manager Business Services and review of the process map for Customer Notifications, it was identified that all relevant notifications are in writing as per Aqwest's Process Map. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|--|--------------------|----------------------|
| | | | Recommendation Not Applicable | | |
| 170 | Not used | - | - | - | - |
| 170A | Not used | - | - | - | - |
| 171 | Water Services Act Section 12 | 3 | The following personnel were interviewed: — Manager Asset Lifecycle | A | 1 |
| | WL 2: Version 10: Clause 5.1.3 | | The following documents were reviewed: — Aqwest SAMP Strategic Asset Management Plan Final | | |
| | WL 2: Version 11: Clause 5.1.3 | | WL02 – Aqwest – 2017 Operational Audit Review Report Promapp: Manage Regulator Audits & Asset Management Reviews Conducted by an Independent Expert | | |
| | The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change. | | Through discussion with the Manager Asset Lifecycle and review of Aqwest's Strategic Asset Management Plan (SAMP), Aqwest confirmed that no material changes to its asset management system took place throughout the Audit Period. Therefore, ERA was not notified. Reviewing Aqwest's Promapp, "Manage Regulator Audits & Asset Management | | |
| 172 | Water Services Act Section 12 WL 2: Version 10: Clause 5.1.7 | 3 | Reviews Conducted by an Independent Expert", we confirmed that compliance with ERA's audit review and guideline procedure is available and in place. Under Step 7.0, non-compliances and opportunities for improvement are recorded. In Step 8.0, reports to regulator on implementation of audit or review is prepared. The licensee was compliant with this obligation throughout the reporting period. | A | 1 |
| | WL 2: Version 11: Clause 5.1.7 The licensee must cooperate with the independent expert and | | Recommendation Not Applicable | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|--|--------------------|----------------------|
| | comply with the ERA's audit and review guidelines dealing with the asset management system review. | | | | |
| 172A | Water Services Act Section 12 WL 2: Version 10: Clause 6.1.1 WL 2: Version 11: Clause 6.1.1 If the ERA considers that one or more of a licensee's standard terms and conditions of service is no longer in the public interest, the ERA may direct the licensee: a) to amend: i) the standard term or condition of service; or ii) the standard term or condition of service in accordance with a term proposed by the ERA; and b) to do so within a specified period. | 4 | The following personnel were interviewed: Coordinator Risk & Compliance Through discussion with the Coordinator Risk & Compliance, we confirmed that no change of licensee's standard terms and conditions of service was requested during the audit period. Therefore, no further testing is conducted. The licensee had no activity for this obligation throughout the period. Recommendation Not Applicable | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|---|-------------------|---|--------------------|----------------------|
| | | | | | |
| 172B | Water Services Act Section 12 | 4 | | NP | NR |
| | WL 2: Version 10: Clause 6.1.2 | | | | |
| | WL 2: Version 11: Clause 6.1.2 | | | | |
| | The licensee must comply with a direction given to the licensee under clause 6.1.1. | | | | |
| 173 | Not used | - | - | - | - |
| 174 | Not used | - | - | - | - |
| 175 | Not used | - | - | - | - |
| 176 | Not used | - | - | - | - |
| 177 | Not used | - | - | - | - |
| 178 | Not used | - | - | - | - |
| 179 | Not used | - | - | - | - |
| 180 | Not used | - | - | - | - |
| 181 | Water Services Act Section 12 | 4 | The following personnel were interviewed: — General Manager Water Services | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | WL 2: Version 10: Clause 6.3.1 WL 2: Version 11: Clause 6.3.1 If the licensee is appointed as the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of a supplier of last resort, comply with the duties imposed by the Act and carry out its operations under or for the purpose of the last resort plan in accordance with the Act. | | The following documents were reviewed: — Promapp: Manage Change Aqwest's Manage Change Promapp was provided and assessed to contain the relevant information about the processes that are in place if Aqwest were to be appointed as the supplier of last resort. Through discussion with management, it was confirmed that Aqwest had not been appointed as a supplier of last resort throughout the audit period. Furthermore, it was emphasised that it is highly unlikely for Aqwest to be appointed as the supplier of last resort. The licensee had no activity for this obligation throughout the period. Recommendation Not Applicable | | |
| 182 | Water Services Act Section 12 WL 2: Version 10: Clause 4.4.1(b) WL 2: Version 11: Clause 4.4.1(b) If the licensee provides a water service outside of the operating area the licensee | 4 | The following personnel were interviewed: Coordinator Risk & Compliance The following documents were reviewed: — Water Licence Map Through discussions with Risk, Compliance & Strategy Coordinator, it was identified that Aqwest has not provided water service outside of the operating area of the licence. We also confirmed that Aqwest's provision of water services falls within the operating area boundary by reviewing the Water Licence Map. No issues identified. | A | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|------|--|-------------------|--|--------------------|----------------------|
| | must apply to amend the licence unless otherwise notified by the ERA. | | The licensee had no activity for this obligation throughout the period. Recommendation | | |
| | | | Not Applicable | | |
| 183 | Not used | - | - | - | - |
| 184 | Water Services Act Section 12 | 4 | The following personnel were interviewed: — Coordinator of Water Treatment | A | 1 |
| | WL 2: Version 10: Clause 7.1.1 WL 2: Version 11: Clause 7.1.1 Where the licensee provides potable water, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health. | | The following documents were reviewed: Memorandum of Understanding between the Department of Health and Bunbury Water Corporation for Drinking Water dated 23 December 2019 By reviewing the Memorandum of Understanding for Drinking Water between The Department of Health and Aqwest, and through discussions with Coordinator of Water Treatment, we confirmed that Aqwest has a current Memorandum of Understanding for Drinking Water with the Department of Health. The Memorandum of Understanding was endorsed by the Department of Health and the Corporation on 23 December 2019. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 184A | Not applicable | - | | | |
| 184B | Not applicable | - | | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| 185 | Water Services Act Section 12 | 4 | The following personnel were interviewed: — Co-ordinator Risk & Compliance | A | 1 |
| | WL 2: Version 10: Clause 7.1.4 WL 2: Version 11: Clause 7.1.4 A Memorandum of Understanding must comply with the specified requirements in relation to legal standing of the document and compliance audits by the Department of Health. | | The following documents were reviewed: Memorandum of Understanding between the Department of Health and Bunbury Water Corporation for Drinking Water endorsed on 23 December 2019 Through discussions with the Risk, Compliance & Strategy Coordinator and review of the MOU, it was identified that the legal standing requirements were satisfied. Compliance audits by the Department of Health was not required during the audit period. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 186 | Water Services Act Section 12 WL 2: Version 10: Clause 7.1.5 WL 2: Version 11: Clause 7.1.5 The licensee must comply with the terms of a Memorandum of Understanding. | 4 | The following personnel were interviewed: Manager Asset Lifecycle Coordinator of Water Treatment The following documents were reviewed: Memorandum of Understanding between the Department of Health and Bunbury Water Corporation for Drinking Water endorsed on 23 December 2019 Drinking Water Quality Management Plan Water Quality Report 2022 Memorandum of Understanding Drinking Water Quality Quarterly Report from 01 January 2023 to 31 March 2023 Water Quality Incident Response Desktop Exercise Report from May 2022 Water Quality Incident Plan M41 endorsed on 08 August 2023 Water Quality Committee Meeting Agenda as of 23 August 2023 Aqwest Drinking Water HACCP Risk Assessment | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | | | Through discussion with relevant personnel, it was confirmed that Aqwest complied with the terms of its Memorandum of Understandings with the Department of Health during the audit period. The requirements from the Memorandum of Understandings were reflected in Aqwest's annual report. However, it was noted that Aqwest's compliance of Memorandum of Understandings has not been audited in the past 3 years. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 187 | Water Services Act Section 12 WL 2: Version 10: Clause 7.1.6 WL 2: Version 11: Clause 7.1.6 The licensee must publish in the form agreed with the Department of Health, a Memorandum of Understanding and any amendments to a Memorandum of Understanding within one month of signing or making the amendment. | 4 | The following personnel were interviewed: Coordinator of Water Treatment The following documents were reviewed: Memorandum of Understanding between the Department of Health and Bunbury Water Corporation for Drinking Water The MoU was provided and assessed. The last amendment was 23rd December 2019 and therefore no amendments occurred during the audit period. Further discussions with the relevant manager confirmed that no amendments had taken place in the audit period and therefore, no further analysis was conducted. No issues identified. Recommendation Not Applicable | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| 188 | Water Services Act Section 12 WL 2: Version 10: Clause 7.1.7 WL 2: Version 11: Clause 7.1.7 The licensee must publish the audit report on compliance with its obligations under a Memorandum of Understanding on its website within one month of the completion of the audit. | 4 | The following personnel were interviewed: Coordinator of Water Treatment The following documents were reviewed: Memorandum of Understanding between the Department of Health and Bunbury Water Corporation for Drinking Water The MoU was assessed and had relevant information about the conducting of audits under the MoU. Through discussions with the relevant manager, it was identified that no audits had been conducted during the period. Management explained that funding was maintained if an audit was to be requested under the MoU. Therefore, no further testing was conducted. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | NP | NR |
| 189 | Water Services Act Section 12 WL 2: Version 10: Clause 7.1.8 WL 2: Version 11: Clause 7.1.8 The licensee must publish, in a form agreed with the Department of Health, any | 4 | The following personnel were interviewed: — Coordinator of Water Treatment The following documents were reviewed: — Memorandum of Understanding between the Department of Health and Bunbury Water Corporation for Drinking Water The MoU was assessed and had relevant information about providing the DoH copies of reports and studies undertaken by the licensee which are relevant to public health. | NP | NR |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| | other reports required by the Department of Health or required by a Memorandum of Understanding on the licensee's website, at a reporting frequency specified by the Department of Health. | | Through discussions with the relevant manager, it was identified that no additional reports or studies had taken place during the period. Furthermore, reports are published on the Aqwest website as required by the MoU. The licensee had no activity for this obligation for the period. Recommendation Not Applicable | | |
| 190 | Water Services Act Section 12 WL 2: Version 10: Schedule 2 WL 2: Version 11: Schedule 2 The licensee must comply with the standards set out in Schedule 2 of the licence. | 3 | The following personnel were interviewed: Manager Asset Lifecycle The following documents were reviewed: Post Budget Strategic Asset Plan Aqwest Network Hydraulic Model Update and Analysis Pressure and Flow Operations and Maintenance Control Procedures Pressure Complaints from the Complaints Register Minimum Pressure 2022 Screenshot Pressure and Flow Logger Data Each year a hydraulic modelling tool is used to calculate system performance both current and predicted. The model is accompanied by a report detailing likely gaps in infrastructure performance. The model is developed and periodically reviewed under the guidance of the appropriate standards set out in schedule 2 of the licence. The modelling based on the most recent review has indicated that the network is generally sufficient to meet existing demands and forecast future demands. The review of the model included the review of pressure and flow loggers which provide a reading at 15-minute intervals. | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | | | Through discussions with the relevant manager, it was identified that flow and pressure ratings are monitored through customer complaints. Temporary pressure loggers are also used for monitoring purposes prior to a review of the hydraulic model or to monitor areas in which booster pumps have been implemented. An extract from the complaints register identified 11 complaints relating to pressure or flow. It was assessed that these instances were resolved appropriately and did not have a significant impact to customers. Furthermore, Pressure and Flow Operations and Maintenance Control Procedures outlines the relevant standards, outstanding and closed complaints and links to process maps. The process maps within this document includes investigating poor pressure and flow, booster pump inspections and digital logger management. As there were no significant incident where pressure and flow were identified as being outside the standards, there was no requirement by Aqwest to notify customer or the ERA. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 191 | Water Services Code of Practice (Family Violence) 2020 Clause 5(1) WL 2: Version 10: Clause 4.1.1 | 3 | The following personnel were interviewed: — Customer Service Coordinator The following information and documents were reviewed: — Customer Family Violence Policy Statement – Feb 2023 Clause 5(1) of the Water Services Code of Practice (Family Violence) 2020 (Financial Assistance Aqwest – weblink reference) requires: | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|--|--------------------|----------------------|
| | WL 2: Version 11: Clause 4.1.1 The licensee must have a family violence policy that sets out the matters specified in clause 5(1). | | A licensee must have a policy (a family violence policy) that sets out the following matters – The training to be provided to employees and other persons interacting with customers on behalf of the licensee to enable them to appropriately respond to customers affected by family violence. The information to be provided to customers affected by family violence about external services through which they can receive support, and when that information is to be provided. A process by which the account of a customer affected by family violence can be identified by employees without the need for a customer to repeat details of the issues. How information obtained from, or relating to, customers affected by family violence is to be protected. In what circumstances a customer affected by family violence will, as a result, be taken to be experiencing – payment difficulties for the purposes of the Water Services Code of Conduct (Customer Service Standards) 2018; or financial hardship for the purposes of the licensee's financial hardship policy. How the licensee is to deal with debt management and recovery in relation to the accounts of customers affected by family violence. That the licensee must not request written evidence of family violence from a customer unless the evidence is reasonably necessary to enable the licensee to assess appropriate measures that it may take in relation to debt management and recovery A comparison was performed between the Clause 5(1) of the Water Services Code of Practice (Family Violence) 2020 and the Customer Family Violence Policy Statement – Feb 2023. It was noted that all information points defined in the water services code practice was defined in the customer Family Violence Policy Statement. | | |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | | | The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 192 | Water Services Code of Practice (Family Violence) 2020 Clause 5(2) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following documents were reviewed: — Policy 1.39 Customer Family Violence Policy – 16 February 2023 — PCY02.37 Family and Domestic Violence – Staff Support – 20 April 2023 The grant of the licensee's licence was prior to the 9th of December 2020 and | A | 1 |
| | The licensee must have a family violence policy before the end of the sixmonth period starting on either: 9 December 2020; or if the day of the grant of the licensee's licence is after 9 December 2020, the | | therefore Aqwest must have a family violence policy prior to the 9th of June 2021 deadline. The revision history of the Family Violence Policy indicated that the policy was issued on 20th May 2021, and was reviewed on 16th February 2023 before the revision due date. Therefore, the policy came into effect prior to the 9 June 2021 deadline. The licensee was compliant with this obligation throughout the reporting period. | | |
| | day of the grant of the licensee's licence. | | Recommendation Not Applicable | | |
| 193 | Water Services Code of Practice (Family Violence) 2020 Clause 6 | 4 | The following personnel were interviewed: — Customer Service Coordinator The following information were reviewed: | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|---|-------------------|---|--------------------|----------------------|
| | OL 16: Clause 4.1.1 | | Family Violence Policy on Aqwest's website: "Financial support" | | |
| | OL 17: Clause 4.1.1 | | https://aqwest.com.au/your-home/accounts-and-billing/financial-support Family Violence Policy | | |
| | A licensee must publish its family violence policy on its website and provide a hard copy of the policy to a customer on request and at no charge. | | Through discussion with the Customer Service Coordinator and review of Aqwest's website including webpage history, and the policies and procedures, we confirmed the <i>Family Violence Policy</i> was available on the website and a hardcopy is available to customers upon request, at no charge. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |
| 194 | Water Services Code of Practice (Family Violence) 2020 Clause 7 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 A licensee must review its family violence policy at least once in every 5-year period, and additionally, if directed to do so by the Minister. | 4 | The following personnel were interviewed: Customer Service Coordinator The following documents were reviewed: Family Violence – Financial Support Work Instruction Document number PCY01.39 Customer Family Violence Policy The Document number PCY01.39 Customer Family Violence Policy sets the requirement to review the policy every 3 years. As per the obligation requirements, a review is conducted at least once every 5 years. No issues identified. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| 195 | Water Services Code of Practice (Family Violence) 2020 Clause 8 (1) WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 A licensee must maintain adequate records in relation to compliance with this code or any policy made under the code. If the licensee is a government organisation, as defined in section 3(1) of the State Records Act 2000 (WA), then records must be maintained in accordance with its obligations under that Act. | 4 | The following personnel were interviewed: Records Administrator The following documents were reviewed: General Disposal Authority for State Government Information – 2013-017/1 Aqwest Recordkeeping Plan 2020 Policy 4.31 Records Management 15 June 2023 – 2015-004 Records keeping software is Content Manager. Conversations are recorded in Authority. Record keeping policy and plan. The two schedules indicate how long the records should be kept and depends on the topic. We established that the Family Violence Policy and all associated documentation are stored in Process Manager. This is Aqwest's document management system. We obtained Aqwest's Record Keeping Plan 2020, which sets out the matters about which records are to be created and retained. Specifically, Section 2.2 of the Record Keeping Plan clearly elaborates the records management policy and procedures, ensuring adequate controls are in place against this obligation. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 196 | Not applicable | N/A | Not Applicable | N/A | N/A |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|--|--------------------|----------------------|
| 197 | Water Services Code of Practice (Family Violence) 2020 Clause 9 OL 16: Clause 4.1.1 OL 17: Clause 4.1.1 When a customer affected by family violence first contacts a licensee about a particular matter relating to the family violence, the licensee must inform the customer of the existence and operation of the licensee's complaints procedure under clause 46 of the Water Services Code of Conduct (Customer Service Standards) 2018. | 3 | The following personnel were interviewed: Customer Service Coordinator Through discussions, Aqwest procedure includes reference to the website policy that includes the complaints procedure. Aqwest has maintained a 'Customer Family Violence Policy Statement' on its website with the URL reference pcy01-39-customer-family-violence.pdf (storyblok.com)". Included in this document are useful information such as contact information about the supports available, complaints handling, and Aqwest contact details. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | A | 1 |
| 198 | Water Services Code of Practice (Family Violence) 2020 Clause 10 WL 2: Version 10: Clause 4.1.1 WL 2: Version 11: Clause 4.1.1 | 4 | The following personnel were interviewed: — Business Services Administrator The following documents were reviewed: — Aqwest's website: "Water industry regulation" — https://aqwest.com.au/about-aqwest/water-industry-regulation — Western Australian Legislation website: "Water Services Code of Practice (Family Violence) 2020" https://www.legislation.wa.gov.au/legislation/statutes.nsf/law s52726.html | A | 1 |

| No. | Licence Reference & Summary of Licence Obligation | Audit Priority | Observations and Recommendations | Controls Rating | Compliance Rating |
|-----|--|-------------------|---|--------------------|----------------------|
| | A licensee must ensure that its website contains a link that provides access to the current version of the code as it appears on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation. | | We checked Aqwest's website including webpage history and confirmed that it contains a link to the current version of the Family Violence Code published on the Western Australian Legislation website maintained by the government where the current version of legislations is made publicly available. The licensee was compliant with this obligation throughout the reporting period. Recommendation Not Applicable | | |



Appendix 1: Job Title of Employee's Interviewed During the Operational Audit

| Job Title of Employee | | | | | |
|-----------------------------------|--|--|--|--|--|
| Asset Delivery Coordinator | | | | | |
| Coordinator Risk and Compliance | | | | | |
| General Manager Finance Services | | | | | |
| Coordinator Works Management | | | | | |
| Coordinator Networks | | | | | |
| General Manager Water Services | | | | | |
| General Manager Business Services | | | | | |
| Executive Assistant | | | | | |
| Manager Asset Lifecycle | | | | | |
| Business Services Administrator | | | | | |
| Management Accountant | | | | | |
| Customer Service Coordinator | | | | | |
| Performance and Reporting Analyst | | | | | |
| Coordinator of Water Treatment | | | | | |
| People & Culture Coordinator | | | | | |
| Records Administrator | | | | | |

