IMPLEMENTATION PLAN

Muchea Water 28/7/25

Operational Audit Audit Recommendations

Recommendation (no./year)	Non-Compliance/Controls Improvement (Licence obligation ref. and obligation, Rating, Description of Non-compliance or inadequacy of control)	Auditor's Recommendation	Management comments / actions proposed	Target Completion Date
1/2025	Review of Billing Obligation 115 - The review procedure in clause 22(1) 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. Obligation 116 - The review procedure must state that the customer may but is not required 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. Rating: B3 (Controls: Generally adequate/ Compliance: Non-compliant – moderate impact on customers) The Review of Billing Procedure includes the specified information as per Clause 22(2) & (3) including referral to the ombudsman if not satisfied. However, the procedure does not include making an appeal to the State Administrative Tribunal, as per Clause 22(3)(b) below. Clause 22(3) - In relation to subclause (2)(c), the review procedure must state that the customer may, but is not required to, use the licensee's complaints procedure mentioned in clause 49 before or instead of: (a) applying to the water services ombudsman under a scheme approved under section 65 in respect of the complaint; or (b) making an appeal from, or applying for a review of, the decision that gave rise to the customer's request for review, if an appeal or review is available under regulations mentioned in section 222(2)(k).	The Review of Billing Procedure and the Customer Service Charter should be updated to include a statement that after you have given us the opportunity to resolve your complaint, if you are still not satisfied with the outcome, you may refer your complaint to the independent complaint resolution service. A customer may, but does not have to, use the licensee's complaints procedure before or instead of 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, to the State Administrative Tribunal	The 'Review of Billing Procedure' and the 'Customer Service Charter' have been updated to include a statement that after a customer has given us the opportunity to resolve the complaint, if they are still not satisfied with the outcome, they may refer the complaint to the independent complaint resolution service.	31/7/25 - Completed

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Recommendation (no./year)	Non-Compliance/Controls Improvement (Licence obligation ref. and obligation, Rating, Description of Non-compliance or inadequacy of control) Under Section 222(2)(k), the procedures should also provide	Auditor's Recommendation	Management comments / actions proposed	Target Completion Date
	for appeals from, or the review of, decisions under this Act, including by providing for applications to be made to the State Administrative Tribunal for the review of such decisions.			
2/2025	Review of Billing			
	Obligation 152 – The licensee must make available to each customer, on request and 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 within 5 business days after the request is made.	The review of billing in the Customer Service Charter and the Review of Billing Procedure should state that a response will be provided within 5 business days.	The 'Customer Service Charter' and the 'Review of Billing Procedure' have been updated to state that a response will be provided within 5 business days.	31/7/25 - Completed
	Rating: C1 (Controls: Inadequate controls – Significant improvement required/ Compliance: Compliant)			
	During the audit period, there were 11 requests from customers for information about the quality of water supplied The auditor sighted the details of the correspondence with the customer recorded in the Customer Complaint Register. All complaints were responded to within 5 business days and generally on the same day the request was made. This obligation is documented in the Customer Service Charter (Jan. 2025) available on the website and in hardcopy upon request and at no charge. Also, the Review of Billing Procedure on the website. However, the Charter and the Review of Billing Procedure state we will respond to your enquiry within 15 business days rather than 5 business days. (5 business days applied from July 2024 when the Code of Conduct was updated).			
3/2025	Preserved Supply Register			0.4.17.10.5
	Obligation 154AA - The licensee must ensure that the specified information about Part 9 may be obtained from its website. (from July 2024)	a) Information on how a customer can apply to be included on the Preserved Supply Register should be included on the	Information on how a customer can apply to be included on the Preserved Supply Register has been included on Muchea	31/7/25 – Completed
	Rating: C2 (Controls: Inadequate controls – Significant improvement required/ Compliance: Non-compliant – minor impact on customers)	website and have a link in the Account Establishment Form – Residential.	Water's website (under both the 'Help & Advice' section and 'FAQ's' section).	

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Recommendation (no./year)	Non-Compliance/Controls Improvement (Licence obligation ref. and obligation, Rating, Description of Non-compliance or inadequacy of control)		Auditor's Recommendation	Management comments / actions proposed	Target Completion Date
	Obligation 154CC - The licensee must, within 5 business days after recording a person on the register, provide the specified information in writing to the person. The licensee must, within 5 business days after recording a person on the register, provide the specified information in writing to the person.			Information regarding the Preserved Supply Register has also been included in the 'Connection Application Form – Residential'.	
	Obligation 154C - 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. Obligation 154D - Despite clause 46(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 46(1) must be given in the specified manner. Rating: C/NR (Controls: Inadequate controls – Significant	b)	There should be a documented procedure for a customer request to be included on the Preserved Supply Register including confirmation to the customer, review every 3 years and no flow reduction.	In addition to the actions in a) above, the Preserved Supply Register section in the 'Customer Contract' document has also been updated to advise of the procedure.	31/7/25 - Completed
	improvement required/ Compliance: Not rated) Part 9 of the Code of Conduct specifies the requirements for supply of water to persons with special requirements or needs. This obligation is stated in the Customer Contract (Residential) available on the website. The Muchea Water Director confirmed there have been no request from customers re preserved supply. However, there is no information on the website about how to apply to be included on the Preserved Supply Register. The auditor sighted the Preserved Supply Register and confirmed that it included the prescribed information. There were no customers recorded for Muchea Water. However, there is no procedure re requests from customers to be included on the Preserved Supply Register. There is some information in the Customer Contract on the website about how to notify Muchea Water if kidney dialysis machines are used by a customer but this does not cover all aspects of "preserved supply" as per clause 54 of the Customer Service Standards 2024.				

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Recommendation (no./year)	Non-Compliance/Controls Improvement (Licence obligation ref. and obligation, Rating, Description of Non-compliance or inadequacy of control)	Auditor's Recommendation	Management comments / actions proposed	Target Completion Date
4/2025	Website Link to Code of Conduct Obligation 154AA - The licensee must ensure that its website contains a link to the current version of this code appearing on the WA legislation website. Rating: C2 (Controls: Inadequate controls – Significant improvement required/ Compliance: Non-compliant – minor impact on customers) The Muchea Water website has a link to the previous 2018 Code of Conduct on the home page. There is no link to the current version of the Water Services Code of Conduct (Customer Service Standards) 2024 on the WA legislation site.	The website link to the previous 2018 Code of Conduct needs to be updated to link the Water Services Code of Conduct (Customer Service Standards) 2024 on the WA legislation site.	This website link has been updated to the Water Services Code of Conduct (Customer Service Standards) 2024 on the WA legislation site.	30/6/25 - Completed
5/2025	Compliance and Reporting Register Obligation 190C - The licensee must notify the ERA annually of any restrictions applied in accordance with the Water Services Regulations 2013 to a potable water supply, detailing restrictions by scheme, type (severity), duration, start date and number of services affected. Rating: C/NR (Controls: Inadequate controls – Significant improvement required/ Compliance: Not rated) The auditor confirmed with Muchea Water's Director that there have been no restrictions that required reporting to the ERA in the audit period. This obligation is not stated in the Compliance and Reporting Register as it has not been updated for the 2024 Code.	The Compliance and Reporting Register should be updated for the changes in the Water Services Code of Conduct (Customer Service Standards) 2024 since the previous 2018 version, including the Preserved Supply Register obligations, Performance Standards, etc.	The Compliance and Reporting Register will be updated for the changes in the Water Services Code of Conduct (Customer Service Standards) 2024, including the Preserved Supply Register obligations, Performance Standards, etc.	30/9/25

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Asset Management System Review Review Recommendations

Reference (no./year)	Asset System Deficiency (AMS Component/Effectiveness Criteria/Ratings/Details)	Auditor's Recommendation	Management comments / actions proposed	Target Completion Date
6/2025	Asset Operations Operational policies and procedures are documented and linked to service levels required. Rating: A3 (Process: Adequately defined/ Performance: Corrective action required) Muchea Water's asset and operating decisions have been reasonable in addressing the water quality and water pressure delivery to the Wildflower Ridge customers. However, there is a need to improve the treatment outcomes for iron so it meets the aesthetic guideline more frequently. Although the iron levels are safe for drinking, water utility customers do not expect issues with coloured water and staining of appliances and clothes washing. During the site visit, Muchea Water described the works they have planned to improve the treatment performance, with the works planned during 2025.	Despite the treatment process optimisation work and the general improvement in iron levels, it is recommended that, as planned in 2025, Muchea Water make treatment improvements to produce a sustained improvement in the level of iron occurring in the treated water, with the aim of achieving improved aesthetic water levels for customers more consistently than currently provided. These improvements include reticulation upgrades and an additional water storage tank.	As noted, Muchea Water has an ongoing improvement process, and a number of improvements and upgrades are planned during 2025/26. This includes the installation of cartridge filters (June 2025) as an interim measure whilst other longerterm improvements are implemented. An additional pre-treatment storage tank (noted in the Auditor's comments) was installed in July 2025. A chemical storage tank has been ordered (July 2025) and is currently being fabricated. Further plant upgrades are under review by Muchea Water's engineers.	31/12/25

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