

# **Solo Water**

Retail Supply Management Plan IMS-OPER-B-8314-SW



# **Document Status**

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# 1 INTRODUCTION

This Retail Supply Management Plan (RSMP) (IMS-OPER-B-8314-SW) has been developed to satisfy the requirements of schedule 2 to the Water Industry Competition (General) Regulation 2008 for Solo Water as part of its Retail Suppliers Licence (No. 15\_036R).

Solo Water is wholly Australian owned and operated company that utilises the latest technology to provide a sustainable solution to the nation's water industry. Solo Water is able to reduce the burden on our country's precious water resources by providing recycling water treated to the highest standards.

Solo Water's objective is to provide customers with a sustainable and safe supply of potable water, recycled water and sewerage services for communities in an environmentally friendly and cost-effective manner and in compliance with regulatory requirements, the Australian Drinking Water Guidelines (ADWG) and the Australian Guidelines for Water Recycling (AGWR).

This RSMP applies to Solo Water, its wholly owned subsidiaries and the associated water and wastewater infrastructure owned and operated by Solo Water and its subsidiaries.

# 1.1 Regulatory Framework - WICA

The RSMP forms part of the framework for licencing of private water utilities under the Water Industry Competition Act (2006) – (WICA).

In accordance with the Water Industry Competition (General) Regulation 2008, the RSMP is required to be developed by the licenced retail supplier indicating the arrangements made, or proposed to make, in relation to:

- The events and circumstances that could adversely affect the licensee's ability to supply water or provide sewerage services (or both), as authorised by the licence; and
- 2. The probability of the occurrence of any such event or circumstance; and
- 3. The measures to be taken by the licensee:
  - a. To prevent the occurrence, or minimise the effect, of any such event or circumstance; and
  - b. To arrange for alternative supplies of water or the provision of sewerage services (or both), as authorised by the licence, in response to any such event or circumstance; and
- 4. The arrangements that the licensee has made, or proposes to make, to ensure that it complies with:
  - a. Its code of practice for complaints by small retail customers and its code of practice for debt recovery from such customers; and
  - b. The marketing code of conduct and the transfer code of conduct.

In addition to the Retail Supplier Licence, Solo Water's wholly owned subsidiaries are licenced network operators under WICA. The water and wastewater schemes constructed, maintained and operated under the associated Network Operators Licence(s) are managed in accordance with the respective network operator management plans, processes and procedures. These management plans incorporate water quality



management, levels of service, risk assessment and control, asset life cycle management, incident and emergency response and alternative supplies of water and sewerage services.

The specific management plans under the associated Network Operators Licence(s) for each water and wastewater scheme generally include an Infrastructure Operating Plan (IOP), Drinking Water Quality Management Plan (DWQMP), Recycled Water Management Plans (RWMP) and Sewage Management Plan (SMP). These documents should be referred to for further details relating to each scheme.

# 1.2 Solo Group – Integrated Management System

The Solo Group operates an Integrated Management System (IMS) that conforms to ISO 9001, ISO 14001 and AS/NZS 4801 and OHSAS 18001.

The RSMP will also apply within the broader context of the Solo Group IMS. The purpose of the IMS is to ensure that the company provides projects, products and services in a safe and environmentally responsible manner, whilst also meeting the high standards demanded by the company and expected by our customers and business partners.

The IMS is primarily defined within the following management plans which provide the overriding framework for the implementation of the IMS for the Solo Group including Solo Water activities. These include the following:

- 1. Quality Management Plan (IMS-QUAL-B-8401)
- 2. Safety Management Plan (IMS-SAFE-B-4801)
- 3. Environmental Management Plan (IMS-ENVM-B-3714-SW)

In supporting these management plans, the IMS Document Control Procedure (IMS-DOCC-D-2420) and the associated Document Control Register (IMS-DOCC-G-2414) details the document control procedures and associated register for all controlled documents (e.g. policies, plans, procedures, registers and forms) within the IMS. The RSMP and associated documentation is incorporated within this system.

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#### 2 CUSTOMER SERVICE

#### 2.1 **Customer Contact**

Customers are able to interact with Solo Water's via telephone, website or in writing. Contact details are available on the Solo Water website (www.solowater.com.au), accounts notices and the Home Owners Manual.

The website platform includes access to customer information including:

- Solo Water policies;
- Contact details and online feedback and complaints forms;
- Customer and building application forms;
- Billing and account information;
- Management Plans and regulatory compliance reporting;
- Home Owner's Manual
- Customer information including:
  - Customer Contract; and
  - Codes of Practice. 0

Solo Water also provide telephone support at 1300 7656 98 (1300 SOLO WU) and email support on info@solowater.com.au for general and account enquiries, emergency contact, reporting faults and complaints and general feedback.

For all emergencies, sewer overflows and water outages please call us on 1300 7656 98 (SOLO WU) and follow the prompts for faults and emergencies.

# 2.2 Customer Contract

Solo Water will ensure that a contract is in place with each retail customer prior to commencement of retail services for the supply of water and wastewater services. In most cases the owner of a parcel of land that is serviced by Solo Water is by default a Solo Water customer and agrees to the Customer Contract.

The Solo Water Customer Contract (IMS-OPER-G-8299-SW) defines the scope of supply, commercial arrangements including account payment terms, responsibilities, restriction of supply provisions, access rights, water meter provisions, communications mechanisms and complaints handling processes. The customer contract will be available on the Solo Water website.

Solo Water may also enter into separate agreements with customers where different levels of service may be required.

# 2.3 Customer Complaints and Dispute Resolution

Solo Water has developed a Code of Practice for Customer Complaints (IMS-SERV-D-2097-SW). This code of practice applies to all complaints lodged with Solo Water by customers, stakeholders or members of the public that wish to raise an issue regarding Solo operations, products or services. The Solo Group is committed to managing complaints fairly,

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transparently, efficiently and effectively. Complaints will be managed without cost to our customers.

Our complaint management systems and procedures are intended to:

- Enable us to respond to issues raised by customers making complaints in a timely and cost-effective way.
- Ensure customer confidence in our business activities, products and services.
- Provide information to the company that can be used to deliver quality improvements to our business activities, products and services along with the way we manage complaints.

The Code of Practice for Customer Complaints specifies the process by which Solo Water will respond to customer or community complaints, contact details and how the complaint can be escalated if necessary. Customers will be made aware of the existence of the Energy & Water Ombudsman NSW (EWON) and the procedures for referring complaints or disputes to the ombudsman if the customer decides the matter need to be escalated.

The Code of Practice for Customer Complaints will be available on the Solo Water website.

# 2.4 Debt Recovery

Solo Water has developed a Code of Practice for Debt Recovery (IMS-ADMIN-0549-SW) to assist customers who may be facing financial hardship or other factors beyond the customer's control.

Customers are encouraged to contact Solo Water when they believe that they will have trouble paying their bill on time. Solo Water will offer the customer a plan to settle the debt and recommence normal payment terms within a specified period.

Solo Water's commitment in debt recovery includes:

- Treating customers fairly and in an equitable manner; and
- Providing information to customers in regards to debt recovery requirements; and
- Setting aside debts that are in dispute, including holding any late payment fees for the duration of the investigation and notification of the outcome to the customer; and
- Providing information to the customer regarding the external dispute mechanism (The Energy & Water Ombudsman NSW).

Customers will be made aware of the Code of Practice for Debt Recovery prior to commencement of supply of potable water, recycled water and/or sewerage services. The Code of Practice for Debt Recover will be available on the Solo Water website.

Solo Water will maintain records of customers who are on financial hardship and on payment plans. The number of customers suffering financial hardship needs to be reported to IPART. Refer to Section 3.8 for more information on financial hardship and payment plans.



# 2.5 Privacy Policy

Solo Water will manage customer details and privacy in accordance with the *Privacy Policy Statement* (IMS-HRPR-A-6009). This privacy policy statement can be viewed at www.solowater.com.au/downloads.

# 2.6 Pricing Schedule

Solo Water posts its current *Pricing Schedule* (IMS-SERV-F-2099-SW) online and can be viewed any time at www.solowater.com.au/downloads. This document is generally updated each financial year with the latest pricing information to account for any price and/or services changes and CPI increases etc.

Fees and charges apply to most of the one-off customer interactions with Solo Water and these will be charged in accordance with the Miscellaneous Fees and Charges presented in the Pricing Schedule.

The fees and charges will generally either be invoiced as either a one-off separate invoice, or to the customers normal water bill. The fees and charges need to be invoiced prior to providing the service to the customer.



# 3 MANAGING CUSTOMER INTERACTIONS

# 3.1 Faults, Outages and Emergencies

If the call is an emergency threatening life please advise the customer to call 000.

When a customer calls the Solo Water Utility hotline on 1300 SOLO WU (1300 7656 98) they are first prompted to Press 1 for reporting faults, outages and emergencies.

When a customer Presses 1 the call is automatically diverted to an external service provider (02 8330 6676) who provides a 24/7 call centre service on behalf of Solo Water. The 24/7 call centre operator will record the fault details and customer information and transfer the call to our site operators for immediate attention.

This fault reporting process will also automatically notify our Operations Manager and Site Operators of the call/fault via text message and email notification to provide a management oversight that the issue is being appropriately addressed.

All faults and issues are immediately evaluated for severity and rectified appropriately. All urgent faults and issues are dealt with immediately. Non-urgent faults and issues are typically dealt with on the next business day.

If a Solo Water Retail team member receives a customer call in relation to a fault the call should be transferred to the 24/7 call centre on 02 8330 6676 (or ask the customer to hang up call back and Press 1) so that the fault can be recorded and actioned by the operations team.

Solo Water manages all incidents in compliance with our management system requirements and all incidents are reported as per Solo Water *Incident Response and Notification Management Plan (IMS-AIIR-B-0041-SW – IRNMP)* and internal quality assurance procedures.

# 3.2 Customer Complaints

Solo Water takes all Customer Complaints seriously and all complaints are managed via the following:

- Customer Complaints Procedure (IMS-OPER-D-8313-SW)
- Code of Practice Customer Complaints (IMS-SERV-D-2097-SW)

Solo Water will review and act on all customer complaints.

All health-related complaints where a customer suspects, whether rightly or wrongly, that they may have became ill due to consumption of drinking water or use of recycled water supplied by Solo Water, shall be immediately escalated to the Operations Manager who will report the incident to NSW Health as per the *Incident Response and Notification Management Plan* (IMS-AIIR-B-0041-SW – IRNMP).

Similarly, all complaints relating to drinking water taste and odour issues need to be immediately investigated to ensure there is not a cross connection with the recycled water system on the customers property. Typically, recycled water is slightly saltier than drinking water and if there is a cross connection the water may taste slightly salty. If we are contacted by a customer in relation to a suspected cross connection or drinking water



taste complaint notify the Operations Manager or Environmental Engineer immediately and the issue will be investigated as per the Suspected Cross Connection Procedure (IMS-OPER-D-8304-SW).

# 3.3 Customer Awareness/Education and User Behaviour

Solo Water provides ongoing customer awareness and education to our customers around important issues in the types of water industry that are applicable to our services including for example the appropriate uses of recycled water, appropriate substances to dispose of to sewer and information about our assets, particularly where these are located on customer land, e.g. the pressure sewer units.

Solo Water communicates this information to our customer via the following:

- Solo Water Home Owner Manual (IMS-OPER-C-8312-SW)
- Information sent out on the "Marketing Panel" and "do you know" panel on the quarterly water bills;
- Information posted on the Solo Water website;
- Mass email notifications to our customers on important issues as they arise.

All Solo Water operations and retail staff are required to monitor feedback and interactions with customers as well as any operational issues that may arise in the field that require a feedback loop to customer to improve customer awareness of important issues.

# 3.4 New House Construction and New Connections

Solo Water is required to verify compliance of all new connections before they can connect to the Solo Water services.

This is particularly important as all Solo Water schemes use recycled water hence it is important to verify that there are no cross connections with the drinking and recycled water supplies before the customer connects. Plumbing compliance is the responsibility of the local council and Fair Trade and the licenced plumber doing the work. Solo Water also verifies that the required checks have been undertaken prior to finalising the connection. Once we are happy that the connections are compliant we will issue a Connection Certificate to the builder/plumber/homeowner.

Solo Water also uses a pressure sewer system with assets located on customer land. Solo Water is required to verify that house construction is outside of the Zone of Influence to our assets to ensure they are not damaged. Once we are happy that the proposed building plans are compliant we will issue the Solo Water stamped plan.

All new house construction and connections are managed by the documented processes and procedures outlined below in Table 3.1

The processes are initiated when customers send applications forms to info@solowater.com.au and once a completed application form is received the retail team will send the applicable invoice to the applicant, as per our Pricing Schedule (IMS-SERV-F-2099-SW) and file the application information on the server for processing by the technical/operations team.



Table 3.1: Summary of New Connection processes and procedures.

Control Document	Purpose	Location
Connection Process Guide IMS-OPER-G-8352-SW	Document to explain to customers, builders and plumbers the process for constructing new home and connecting to Solo Water infrastructure.  This can be issued to customers and builders who have questions regarding the connection process.	Intranet and Solo Water website
Property Service Diagram Application IMS-OPER-F-8341-SW	Application form that customers complete to request a Property Service Diagram (PSD).  A PSD is a map print out from Solo Water's Geographical Information System (GIS) that shows the approximate location of Solo Water assets and easements on a particular lot and are used by builders to assist in preparation of building plans.	Intranet and Solo Water website
Std-Builders Information Pack Drawings IMS-CONT-G-1689-SW	Standard drawing set that shows the typical location and depth of Solo Water assets in a number of scenarios.  These standard drawings should be read in conjunction with the PSD to show the indicative location and depth of assets on a particular lot.	Intranet and Solo Water website
Building Plans Stamping Checklist IMS-OPER-F-8317-SW	Checklist available online for use by builders when preparing building plans for Solo Water approval.  It is mandatory that the completed checklist be supplied with all Building Plans applications to be accepted as a complete application.  Given we use pressure sewer and supply recycled water, Solo Water has specific requirements for approval of building plans, which have been included on the checklist.	Intranet and Solo Water website
Building Plans Assessment Application IMS-OPER-F-8339-SW	Application form that customers or builders fill out requesting approval of their proposed building plans.  For a building plans application to be accepted by Solo Water as a complete application the following is required:  • The latest application form is provided with the application.  • The completed Building Plans Stamping Checklist is provided with the application  • The proposed development plans are provided with the application.  Once the application is deemed as a complete application an invoice is to be raised for payment by the applicant and the application filed for assessment by the technical team.	Intranet and Solo Water website

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Control Document	Purpose	Location
	The technical/operations team will assess this application and once the plans are satisfactory a Solo Water stamped plan will be issued as the approval document via email.	
	If the plans submitted are non-compliant to the checklist, an RFI will be issued to the applicant and a new application will need to be submitted.	
Standard Conditions for Building Plan	All Solo Water stamped plans must be issued with the Standard Conditions of Building Approvals.	Intranet
Approvals IMS-OPER-G-8351-SW	The operations team checks compliance with these conditions before a house is allowed to connect.	
Application for Services Connection	Application form that customer, builders or plumbers fill out requesting connection to Solo Water services during house construction.	Intranet and
IMS-OPER-F-8338-SW	The operations team undertake a number of checks while the house is being built.	Solo Water website
New Connection	An internal checklist that our site Operators fill out during the final inspection and once compliant will email in for final approval.	locks are a k
Checklist IMS-OPER-F-8336-SW	A compliant checklist is required to be able to receive the final connection certificate for the lot.	Intranet
Pool Connections Compliance	Application form that customers or pool builders fill out requesting Solo Water undertake a final inspection of the pool at the end of construction. Note that this is not required if the pool is constructed and inspected at the same time as the house.	Intranet and
Inspection Application Form	The operations team will then undertake a final inspection of the pool to verify Solo Water requirements have been complied with.	Solo Water website
IMS-MAIN-F-7458-SW	A Connection Certificate can be issued for a pool if the pool is built separately to the house. Additional fees apply where the pool inspections and certificates are issued separately to the house.	
	The Connection Certificate is the final connection document that is issued by Solo Water once the builder and plumber demonstrate compliance with all Solo Water requirements.	
Connection Certificate IMS-OPER-D-8344-SW	The Connection Certificate is required to be able to legally occupy a house and is issued by the Retail team once the connection is approved by the operations team.	Intranet and Solo Water website
	As a minimum the following is required before a connection certificate can be issued:	
	Demonstration of compliance with the Standard Conditions for Building Approvals;	

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Control Document	Purpose	Location
	<ul> <li>Final inspection undertaken by operations staff and the completed checklist and supporting documentation submitted to head office;</li> <li>Approval from the plumbing regulator, which at CHB is the Lake Macquarie City Council Plumbing and Drainage Works Satisfactory Completion Letter.</li> <li>Engineers report in relation to the Zone of Influence to Solo Water assets certifying that all works have been founded outside or below the zone of influence and will not impact on Solo Water assets.</li> <li>Any other specific requirement for that lot.</li> <li>Approval from the technical/operations/compliance team.</li> </ul>	
Disclosure Notice IMS-SERV-D-2098-SW	The Disclosure Notice is a legal requirement to provide information about Solo Water to customers before they connect.  This is also sent upon change of ownership.	Intranet
Retail New Connection Checklist IMS-OPER-F-8374-SW	An internal checklist to be completed by the Retail team when processing new connections to ensure nothing is missed.	Intranet
Customer Applications Database	Spreadsheet database that stores the important information for all customer applications for tracking and records management purposes. This is a working tool accessed by both retail and field staff.	Retail folder

# Change of Ownership

Solo Water is required to manage the change of ownership process with conveyancers for all lots serviced by Solo Water. This is important to ensure that we always have the correct customer details of the lot owner for rating purposes. During the property transfer any outstanding monies owed by the previous owner are settled at the property settlement so the new owner is not left liable for these charges.

At this stage we also require the purchaser to engage a licenced plumber to undertake a recycled water plumbing compliance assessment, undertake a cross connection test and provide a compliance certificate to Solo Water. This is to protect the new owner and ensure that the recycled water plumbing is compliant to the Australian Plumbing Standard AS3500 and there are no cross connections on the day the property is transferred.

Table 3.2: Summary of Change of Ownership processes and procedures.

Control Document	Purpose	Location
Change of Ownership Form (IMS-OPER-F-8340-SW)	An application form that conveyancers typically fill out and submit to initiate the change of ownership process with Solo Water for a specific lot.	Intranet and Solo Water website

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Control Document	Purpose	Location
Retail Changes of Ownership Process Checklist (IMS-OPER-F-8371-SW)	Internal checklist filled out by the retail team when undertaking change of ownership to ensure nothing is missed.	Intranet
	Application form that customers complete to request a Property Service Diagram (PSD).	
Property Service Diagram Application (IMS-OPER-F-8341-SW)	A PSD is a map from Solo Water's Geographical Information System (GIS) that shows the approximate location of Solo Water assets and easements on a particular lot and is typically requested by the seller's conveyancers for inclusion in the sales contract to demonstrate to the new owner the property is serviced.	Intranet and Solo Water website
Special Meter Read Form (IMS-OPER-F-8372-SW)	Internal form used by operations staff to undertake a special meter read as required to calculate the outstanding charges for the property settlement.	Intranet
Disclosure Notice IMS-SERV-D-2098-SW	The Disclosure Notice should be issued to the new owner prior to the settlement date so that they are aware of Solo Water requirements prior to purchase of the land and becoming our customer.	Intranet

### 3.6 Customer Database

Solo Water will maintain an accurate customer database with all current customers and their contact details. A Solo Water customer is the owner of a lot inside one of our schemes where the lot has a water, sewerage or recycled water connection point.

Solo Water requires the following information for all current customers:

- Customer number
- Site address/parcel Lot and DP
- Billing address
- Email
- Mobile phone

We need this information so we can communicate with our customers about important issues relating to the services we provide.

The customer Database is maintained in the Utilmate software and integrated with the NAV corporate accounting software.

# 3.7 Water and Sewerage Bills

Solo Water will issue water and sewerage bills to all customers on a quarterly basis calculated based on fixed and usage charges. Bills are prepared in-house by the Solo Water retail team using the Utilmate software that is integrated with the NAV corporate accounting software.

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### 3.7.1 Customer MyAccount Portal

Water and sewerage bills are also available via the Solo Water customer "My Account" portal. The portal contains information on the customer billing, usage and other useful links with online payment option available through the portal.

### 3.7.2 Disputed Bills

If a customer contacts us to dispute a bill an internal investigation shall be undertaken to determine the validity of the claim. Where possible all disputes should be rectified directly with the customer to avoid unnecessary escalation of the dispute.

If the dispute is over disagreement of meter reading, the customer should be advised to take a photo of the water meter and send it in as proof for verification. A customer should not have to pay any disputed amount of a bill until the dispute is resolved.

If we have made an error on a bill we will apply a credit on the next bill cycle. A credit should not be applied to a disputed usage charge unless the water meter database is also updated by the operations team at the same time.

# 3.8 Financial Hardship and Payment Plans

Solo Water manages debt recovery from our customers based on the Code of Practice - Debt Recovery (IMS-ADMN-D-0549-SW) and the customer contract.

Solo Water will not penalise a customer that has advised us they are suffering from financial hardship. Details of all customers who advise us they are suffering financial hardship need to be recorded as we have an obligation to report all cases of financial hardship to IPART on a quarterly basis. All applications for financial hardship need approval from Solo Water management prior to flagging the customer in the finance system. Solo Water management will require proof of financial hardship before approving e.g. Centrelink letter, letter of employment termination, letter from bank regarding deferral of mortgage payments etc.

In the majority of circumstances Solo Water will allow special payment plans for all customers who request this. Payment plans do not provide a customer with a discount or reduction in the amount paid to Solo Water. Customers on payments plans are not by default classified as in financial hardship, but instead it is a flexible payment option provided to Solo Water Customers.

# 3.9 Concealed Leak Policy

Solo Water has implemented a concealed leak policy (IMS-OPER-A-8385-SW) that outlines the financial assistance that may be offered to a customer that has experienced a concealed leak on their property and to provide customers with the criteria required to apply for a concealed leak rebate.

As a goodwill gesture, in accordance with this policy, property owners may receive financial assistance where water has been lost on the customer's property due to a verified concealed underground leak that has resulted in abnormally high-water usage related charges. The Concealed Leak Policy will be available on the Solo Water website which



details the eligibility criteria and application and assessment process for financial assistance.

### 3.10 State Government Pensioner Rebates

Following lobbying from Solo Water on behalf of our pensioner customers, from early 2020 the NSW State Government via the Department of Planning, Industry and Environment has decided to include pensioner customers of WICA licenced private water utilities in the state government pensioner rebate scheme.

The pensioner rebate is <u>not</u> paid to customers directly by Solo Water, but rather each eligible customer needs to apply to the Department of Planning, Industry and Environment who will pay the rebate directly into the customer's nominated bank account on an annual basis.

For customers that require additional information on the NSW Government Pensioner Rebate scheme please ask the customer to contact the NSW Government directly on the below details:

Phone: 1800 953 119

Email: private.water.rebates@planning.nsw.gov.au

Post: NSW Private Water Scheme Pensioner Rebates

PO Box 435

Parramatta NSW 2124

The state government has also supplied Solo Water with a FAQ and information pack that we can also provide to customers.

#### 3.11 Critical Water Users

As a water utility servicing the community with essential services, Solo Water is required to ensure that customers with any special or critical water use requirements are managed to minimise any supply interruptions. The main critical water users are health related, for example customers that use a home dialysis machine are required to have a guaranteed water supply with minimal interruptions.

It is a requirement of the Customer Contract (IMS-OPER-G-8299-SW) that all customers inform Solo Water of their critical water needs. The Application for Services Connection (IMS-OPER-F-8338-SW) and the Change of Ownership Form (IMS-OPER-F-8340-SW) includes a specific question on critical water uses and Section 5.1 of the Home Owner Manual (IMS-OPER-8312-SW) also includes information for the customer on critical water uses.

All Critical Water users need to be recorded and reviewed by the Operations Manager so that appropriate action can be taken. In general, critical water users like Home Dialysis patients are required to install their own water tank and pump on their property to supply the critical water use so that even in the event of water main break or outage the customer has adequate storage onsite to supply their own critical water uses. The Solo Water Operations team also need to be aware of any critical customers so they can ensure supply interruptions at that address are minimised as much as possible.



For all customers that inform us of their critical water uses either by phone or in writing the following action must be taken by the Solo Water retail team:

- Record the customer and information on the Critical Water use in the Critical Customer Information Register (IMS-SERV-G-2106-SW);
- Register the customer as a Life Support Customer on the Utilmate software;
- Notify your supervisor and inform the Operations Manager;

The Operations Manager will undertake a review and take appropriate action including ensuring that the information on the Customer Information Register (IMS-SERV-G-2106-SW) is complete and will notify the Operations staff to ensure that they are aware of the location of the critical water customer so they can minimise disruptions during operations and maintenance activities.

### 3.12 Backflow Prevention Devices on Customer Side of Meter

Backflow prevention refers to the control of potentially harmful contaminants entering into our drinking water or recycled water supply from cross connections in a customer's property or from the backflow of contaminants into the water supply system.

All customer water meters on Solo Water schemes include a dual check valve integrated into the water meter. The dual check valve prevents water from the customer side of the meter from back flowing into the water network and potentially contaminating the water in the mains in the street.

For some customers that have installed a device/water fixture with a potential medium or high cross-connection hazard rating on their property an additional backflow prevention device will be required to further guarantee protection of water quality in the street. The required backflow device is determined by identifying the individual hazard(s) within the property in accordance with the three hazard ratings identified in Australian Standard AS/NZS 3500 Plumbing & Drainage for cross connection.

The three 'cross connection' hazard ratings identified by AS/NZS 3500 are:

- 1. Low hazard any condition, device, or practice that in connection with the water supply system, constitutes a nuisance but does not endanger health or cause injury.
- 2. Medium hazard any condition, device, or practice that in connection with the water supply system, has the potential to endanger health.
- 3. High hazard any condition, device, or practice that in connection with the water supply system, has the potential to cause death.

The most common high hazard water use devices undertaken by a residential customer is a bidet or a douche hose fitting provided in the toilet for cleaning.

There are a variety of backflow prevention devices available to use under the Plumbing Code AS/NZS 3500 that are enforced by the Plumbing Regulator (Local Council or Department of Fair Trade). The most common backflow prevention device on a high cross-connection hazard rated site is a Reduced Pressure Zone Device (RPZD). These devices are highly effective but are required to be tested annually by a qualified Licenced Plumber to ensure their safe ongoing operation.



It is a Solo Water requirement that all properties with a water connection that present a medium or high hazard rating must install and maintain an appropriate backflow prevention device at the property boundary for site containment protection purposes in accordance with AS/NZS 3500.

The customer is responsible for the installation, maintenance and testing of the site containment backflow prevention device. An approved test certification report for these devices must be completed and submitted annually to Solo Water at full cost to the customer.

This site containment protection device is generally required in addition to any additional individual or zone protection that may be required by the plumbing regulator inside the property boundary. Any additional individual or zone protection remains the responsibility of the property owner and the Plumbing Regulator.

As the Water Utility, Solo Water is required to ensure that all customers with a testable Backflow Prevention Device like an RPZD installed on their property boundary undertake the annual testing and maintenance of the device to ensure its ongoing effective operation and protect the quality of the water network from potentially harmful cross contamination.

Solo Water will maintain a register of all current testable site containment backflow prevention devices and annual test reports.

Generally, the installation of the RPZD is identified and recorded during house construction and connection process, however in some cases a new RPZD may be installed into an existing house.

Upon notification of a site containment backflow prevention devices having been installed at a customer's property, Solo Water will undertake a review of the device and test report information and take the following action, including:

- Record the customer and information on the high risk water use and backflow prevention device in the Critical Customer Information Register (IMS-SERV-G-2106-SW);
- Inform the customer of the requirement to undertake annual testing of the device;
- Registering the Lot, customer and Backflow Prevention Device in the Asset Management System (Maximo) so that reminders can be set to require the customer to undertake the testing and provide the test certificate;
- If the annual test certificate is not received then a Rectification Notice will be sent to the customer requiring the test certificate to be provided as per the Rectification Notice Procedure (IMS-MAIN-D-7466-SW).



# 4 INCIDENT MANAGEMENT AND RESPONSE

# 4.1 Risk Management

A major objective of Solo Water is to reliably and safely meet the licence requirements of the Retail Operator's Licence and its associated Network Operator's Licences. This includes a commitment to providing continuity of water and wastewater services to customers and ensuring the infrastructure can operate without causing harm to public health and the environment and complies with the requirements of other relevant legislation such as the Occupational Health and Safety Act.

Solo Water has implemented a risk management system to proactively manage these risks through appropriate hazard identification and risk management frameworks. The particular frameworks applied may vary depending on the system components and aspects with separate frameworks being applied to drinking water, recycled water, sewage as well as the quality, work health and safety, and environmental aspects.

The methodologies used for hazard assessment and risk management include the AS/NZS ISO 31000 Risk Management Standard, Australian Drinking Water Quality Guidelines (2011) and the Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (NRMMC; EPHC; AHMC, 2006).

The outcome from the risk management processes are recorded in the respective risk registers for each scheme in accordance with the Solo risk management procedures. These risk registers are maintained and managed by the associated Network Operator throughout the life of the assets and regularly reviewed and updated in accordance with Solo IMS requirements.

An integral outcome of the risk management process relates to the development of risk prevention and control strategies for each significant hazard, including the implementation of management plans, operating procedures and emergency plans and through employing skilled and trained operators who can effectively manage and control the system.

### 4.2 Continuity of Water Supply and Sewerage Services

Solo Water is committed to minimising the incidence and inconvenience to customers associated with the potential for discontinuity of service. The design of Solo Water infrastructure as part of the network operator's licence has allowed for adequate redundancy to increase the reliability of system processes. Redundancy provision allows for equipment failure and for equipment to be taken off-line for programmed and unprogrammed maintenance without compromising the level of service provided by the system.

A number of additional controls have been incorporated to mitigate the risk associated with continuity of supply. These include:

- 1. Automated operation, remote monitoring and alarm systems through the Supervisory Control and Data Acquisition (SCADA) system;
- 2. Provision of adequate storage within the water and wastewater system(s);
- 3. Regular asset inspections, monitoring and asset maintenance;



- 4. Provision for the connection of portable generators for critical assets including pumping stations. Main treatment plant sites are backed up with standby power generation via an onsite generator with auto-changeover switches;
- 5. Contingency planning for the arrangement of alternate supplies of water or the provision of sewerage services such as including the utilisation of water and wastewater tankers to provide continuity of service in the event of a critical asset failure.

The adequacy of the above measures to reduce the risk of asset and system failure to an acceptable level will be assessed via a continuous improvement mechanism within the IMS framework.

Solo Water have identified and addressed the following scenarios for each system:

- 1. Interruption due to incidents and asset failure
- 2. Interruption to drinking water supply
- 3. Interruption to recycled water supply
- 4. Interruption to sewerage services
- 5. Interruption due to potable water or recycled water quality
- 6. Interruption due to demand exceeding availability

The events, circumstances and corrective measures associated with the above scenarios are detailed within the related IOP, DWQMP, RWMP and SMP for each water and wastewater scheme under the associated Network Operators Licence(s). These scenarios are discussed briefly below. The relevant management plan for each scheme should be referenced for further details.

# 4.3 Interruption Due to Incidents or Asset Failure

Solo Water infrastructure as part of the respective network licence has allowed for adequate redundancy to increase the reliability of system processes however incidents may still potentially occur resulting in a disruption to service.

These will be addressed for each scheme; however, the following measures will typically be implemented within each scheme to mitigate the risk of interruption due to incidents or asset failure:

- 1. Redundancy and storage provision will be incorporated where possible to allow for asset failure and for assets to be taken off-line for programmed and un-programmed maintenance without compromising the level of service provided by the system;
- 2. System automation and monitoring via SCADA providing continuous 24 hour seven days a week monitoring with early detection alarms. The early detection alarm system allows Solo Water operators to respond and rectify any potential issues that might cause an interruption in supply;
- 3. Asset inspection, monitoring and maintenance regimes are implemented as part of the asset management strategy of each scheme to ensure the infrastructure operates effectively and reliably. Programmed maintenance which may result in



- service interruption will be scheduled during periods of low demand and/or alternate supply or service provisions implemented where possible to minimise the interruption.
- 4. Security monitoring is implemented throughout the schemes where possible to detect potential security breaches at Solo Water assets.
- 5. Provision for the connection of portable generators for critical assets including pumping stations and Critical Control Points;
- Contingency planning for the arrangement of alternate supplies of water or the 6. provision of sewerage service. This includes the utilisation of bulk potable water tankers to provide continuity of potable water supply in the event of a failure or main break and the provision of sewage tankers for the removal and disposal of excess sewage.

Whilst asset failure or incidents may still potentially occur, Solo Water has implemented emergency response and incident management plans and procedures to minimise the duration of a potential outage and resulting impact on our customers. This includes planning for various incidents and failure scenarios including pipeline breaks and failures, power failure and communications failure.

# Interruption to Drinking Water Supply

Solo Water has designed the drinking water supply system with process controls, continuous monitoring and system redundancy to ensure the reliability of water supply. Solo Water has also established incident management plans and procedures to minimise any potential interruption to drinking water supply including the provision of alternate supplies and portable generators.

Where required, Solo Water will establish an inter-agency Code of Conduct with any public water utility or other authorised bulk drinking water supplier for the supply of drinking water. The Code of Conduct will detail the various responsibilities for each party including who is responsible for water quality and repairing, replacing or maintaining any pipes, pumps, valves or storages of other infrastructure connecting the drinking water systems.

# Interruptions to Recycled Water Supply

Solo Water's recycled water treatment facilities and associated network infrastructure are designed to operate reliably and supply recycled water in accordance with the Australian Guidelines for Water Recycling (AGWR). It is expected that interruption due to water quality issues will be rare because the system uses state of art treatment processes and online monitoring systems that can detect issues before they occur. It is however possible that some interruptions to a recycled water supply might occur from time to time which could adversely impact supply including a process failure, pipe failure and water quality incident.

Solo Water has designed the recycled water system with process controls, continuous monitoring and system redundancy to ensure the reliability of treatment system processes. The system allows for potable water to top up the recycled water network if the recycled water production is not able to meet demand. The system automatically shuts down before a possible water quality events can occur and potable water is issued as a backup to ensure

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continuity of supply. This in addition to the provision of adequate recycled water storage will assist in minimising the disruption of supply.

# Interruptions to Sewerage Services

Solo Water has systems and redundancy measures in place to prevent or minimise the disruption of sewerage service. Monitoring of the sewer system is undertaken by SCADA which provides early detection systems, real-time data and alarm response.

Incident and emergency response plans are also established and the system designed with the ability to isolate any breakages in the system and allow the redundancy in the pressure sewer system to store the sewage load until the problem has been fixed or to allow pump outs to occur.

Solo Water has also established arrangements in place to facilitate the collection of sewage for disposal in adjacent sewerage systems to maintain service continuity in the provision of sewerage services during abnormal operation.

#### Interruption Due to Potable Water or Recycled Water Quality 4.7

If there are interruptions due to water quality, these problems will be addressed by the Network Operator in accordance with their respective DWQMP and RWMP(s).

Drinking water and recycled water quality will be regularly monitored at various points throughout the network. Incident and emergency response plans and procedures have been established in the event of an identified water quality incident which identifies the corrective actions required to address any water quality issues whilst enabling the system to be returned to normal operation as soon possible to minimise the extent of any potential interruption.

Solo Water has designed the potable water and recycled water systems to facilitate the substitution of the recycled water system with potable water back up in the event of a recycled water quality event. The system automatically shuts down when a possible water quality event is detected and potable water will be issued as a backup to prevent the supply of non-compliant water.

# Interruption Due to Demand Exceeding Availability

Solo Water will ensure there is an adequate supply of water to meet the expected demand for each scheme. The expected demand for each system has been determined as part of the master plan development for each scheme. Potable water backup is available for recycled water system if the demand for recycled water exceeds the availability. Solo Water will enforce any water restrictions that may need to be in place due to prolonged seasonal droughts when potable water is being used to top up the recycled water system.

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# COMPLIANCE

#### 5.1 **Transfer Code of Conduct**

Solo Water is committed to complying with the Transfer Code of Conduct 1 established by the Minister in accordance with the Water Industry Competition (General) Regulation 2008 which applies when there is a transfer of water supplies or sewerage services.

When a customer is transferred from one licensed retail supplier to another, to a public water utility or vice versa the Transfer Code of Conduct describes the arrangements of how this is to be conducted. Obligations are imposed by the code on both the incoming and outgoing retailer, and the network operator.

Solo Water will abide by the Transfer Code of Conduct when transferring a customer to another retailer supplier or vice versa.

# **Marketing Code of Conduct**

Solo Water is committed to complying with the Marketing Code of Conduct 2 as established by the Minister in accordance with the Water Industry Competition (General) Regulation 2008 which applies to the marketing of water supplies and/or sewerage services by marketers to small retail customers.

When marketing to small customers Solo Water will comply with all applicable State and Commonwealth laws. This includes:

- Not engaging in misleading, deceptive or unconscionable conduct to a customer;
- Not exert undue pressure on a customer, or harass or coerce a customer;
- Ensuring that information provided to customers is truthful and in plain language;
- Ensuring that information provided to individual customers is relevant to that customers circumstances; and
- Provide only timely, accurate and verifiable and truthful comparisons.

Solo Water will abide by the Marketing Code of Conduct in communication with small customers.

# **Reporting Requirements**

As part of the WICA Retail Supplier Licence requirements, Solo Water are required to prepare and submit reports in accordance with the current version of the IPART Network Operator's Reporting Manual and Retail Supplier's Reporting Manual. This includes obligations for immediate and annual and incident reporting requirements.

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<sup>&</sup>lt;sup>1</sup> Transfer Code of Conduct is available at https://www.metrowater.nsw.gov.au/water-industry-reform/codes-conduct

<sup>&</sup>lt;sup>2</sup> Marketing Code of Conduct is available at <a href="https://www.metrowater.nsw.gov.au/water-industry-reform/codes-conduct">https://www.metrowater.nsw.gov.au/water-industry-reform/codes-conduct</a>



All Solo Water Schemes operate in compliance with an Incident Response & Notification Management Plan that defines the types of events that require reported to IPART, NSW Health and EPA.

As part of the licence conditions, Solo Water will submit annual compliance reports detailing compliance with the licence obligations, during the previous financial year ending 30 June.

All compliance reporting is exceptions-based, meaning that only breaches are required to be reported. Breaches are required to be reported either as soon as practically able to do or in the annual report, depending on the potential impact of the breach on water quality, continuity of supply, public health, safety etc. The reporting obligations are specified within Appendix B within the IPART Network Operator's Reporting Manual and Retail Supplier's Reporting Manual.



# **REVIEW AND CONTINUOUS IMPROVEMENT**

This plan will be regularly reviewed and updated as part of Solo Water's ongoing commitment to continual improvement in accordance with the IMS document management procedures detailed within the Quality Management Plan (IMS-QUAL-B-8401).

The RSMP review will include involvement from relevant stakeholders as required. This review will at a minimum take place annually.

Whilst undertaking the review the following inputs may be considered:

- Any directions from the Minister (as required)
- Changes to legislative and regulatory requirements;
- Changes to Solo Water's IMS, management plans, procedures, codes of conduct, risk registers and other relevant documentation;
- Results of internal and external audits:
- Communications from interested parties e.g. IPART, NSW Health;
- Performance against licence conditions, performance criteria and levels of service;
- Review of any significant issues, incidents and emergency events;
- Changing circumstances, including:
  - Changes in the company;
  - Changes in the services supplied;
  - Changes in the master plans and infrastructure (plant and equipment).

The Codes of Practice for Customer Complaints or Debt Recovery will also be reviewed in accordance with the IMS document management procedures or in the event that:

- There is a change to the WIC Act, Regulation or other Law that has a material effect on the codes; or
- There is a material change to the terms of the Customer Contract; or
- There is a change to Solo Water processes or procedures.

Solo Water will provide any update of the RSMP and associated codes of practice to IPART in accordance with its licence conditions. Copies of any updated documentation will also be posted on the Solo Water website and provided to the ombudsman and the Minister as required.

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