



## Natural Resources Access Regulator

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Our ref: V22/695#18

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IPART  
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By Email: [Maria\\_Morohan@ipart.nsw.gov.au](mailto:Maria_Morohan@ipart.nsw.gov.au)

Dear Michelle

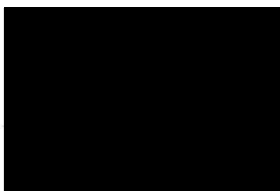
Thank you for your letter dated 31 March 2022 regarding the draft WaterNSW Operating Licence review.

My team has reviewed the documentation as requested. We make the following recommendations for your consideration:

- Amend clause 6.19.3(a) to specify that WaterNSW use its best endeavours to amend the Metering Data Sharing and Services Agreement in consultation with NRAR and DPE to specify standards and metrics for data accuracy, quality, continuity and timeliness of data provision.
- Note that data quality and cleansing metrics are well advanced and that amendments to the Metering Data Sharing and Services Agreement could reasonably be expected to be made prior to the current proposal for 1 September 2023 in clause 6.19.3. We request that IPART amend this date.
- Amend clause 6.3.1 to specify the determination of volumes of water extracted by customers has utility beyond billing purposes. This information is essential for compliance purposes, which WaterNSW provides to NRAR at various frequencies depending on the source of data and method of abstraction. We request that IPART amend clause 6.3.1 to reflect the actual frequency of data availability permitted by the type of licence and reporting arrangements under that licence. For example, telemetered data from metered works should be specified as available on a daily basis via the Data Acquisition Service (DAS).

Thank you for the opportunity to comment on the draft WaterNSW Operating Licence. Please contact Tim Gilbert, Director Regulatory Capability and Coordination, on [REDACTED] should you have any questions

Yours sincerely



**Grant Barnes**  
**Chief Regulatory Officer**  
20 April 2022