



Sydney Water Operating Licence
Review 2023-24

Public Hearing Transcript

Thursday, 15 February 2024

Water >>

Acknowledgment of Country

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present.

We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

Tribunal Members

The Tribunal members for this review are:

Carmel Donnelly PSM, Chair
Jonathan Coppel

Enquiries regarding this document should be directed to a staff member:

Christine Allen (02) 9290 8412
Mamata Titus (02) 9113 7750

The Independent Pricing and Regulatory Tribunal

IPART's independence is underpinned by an Act of Parliament. Further information on IPART can be obtained from [IPART's website](#).

Contents

Sydney Water operating licence review	1
1.1 Welcome	1
1.2 Acknowledgement of Country & overview of the licence review	2
1.3 Sydney Water presentation	4
Session 1	8
1.4 IPART presentation	8
1.5 Q&A session	11
Session 2	15
1.6 IPART presentation	15
1.7 Energy and Water Ombudsman NSW presentation	17
1.8 CoNexa presentation	20
1.9 Q&A session	22
1.10 Closing remarks	23

Sydney Water operating licence review

1.1 Welcome

Andrew Nicholls: Good morning, everyone, and welcome to today's public hearing.

My name is Andrew Nicholls, and I am the CEO of the Independent Pricing and Regulatory Tribunal (IPART). I am your MC for today.

With me is Carmel Donnelly, who is the Chair of IPART and a Tribunal member, and with her as a fellow Tribunal member, is Jonathan Coppel. We also have with us today some of our IPART Secretariat staff: Michelle Coco, Christine Allen, Mike Smart, Mamata Titus, Sachin Singh, Gudny Palsdottir, Alex Jenkins, and Nahrain Oshana.

I would like to open by saying that we very much welcome and value your input into our review and appreciate your time in participating in the hearing today. It is great to have so many people here with us today.

I will soon hand over to Carmel, who will give you an overview of the licence review, but before that, I will go over a few housekeeping notes:

- Firstly, in relation to fire and emergency exits, for those of you who are in the room, the fire exits are immediately straight behind as you go through the front door. If the fire alarm goes, there will be people who will assist you to exit the building.
- For our online guests: please keep your microphones muted when you're not speaking to avoid feedback and background noise.
 - We encourage you to keep your cameras on, if your internet connection is up to it and if you are comfortable in doing so, because it helps us all to connect with you in this hybrid format.
 - Please make sure that your name, and if relevant, your organisation is showing so that we know who you are.
 - If there are people calling on the line, if you are going to speak could you please take yourself off mute and tell us your name and again, if you're representing an organisation.
 - We will facilitate the Q&A and invite you to ask questions. You'll also be able to, if you're online, make some questions in the chat box.
- To ensure that we have an accurate record of the discussion today, we are transcribing the hearing and we will place a copy of the transcript on our website in a few days. We are also recording this hearing to ensure that the transcription is accurate, and so that our guests online can participate better. We do not intend to publish the video recording.
- We acknowledge those who do not want to be recorded and we assure you this recording will not be available for public viewing.
- Being a public hearing, everyone present today is free to publish and refer to what is said. Everyone is encouraged to share their views and ask their questions.

- At the end of each of our 2 presentations today, there will be an opportunity for you to ask questions.
 - For those of you who are here in person, please raise your hand and we'll come to you.
 - For those online, we are using the chat box in Zoom so please let us know if you have a question. We will either come to you to ask that directly, or, if you ask the question in the chat box, we'll read that out and respond to it.
 - I will do my best to juggle between the two. It does have some challenges in this hybrid world to make sure that we're giving everybody a fair chance in oscillating between online and those who are present. So please bear with us as we do that.
 - There is a way for people who are joining us by telephone to ask questions. If there is anybody in that situation, we will come back with some information about how you can get your hand up and ask questions.
- Finally, we would like to remind everyone that we have a responsibility to ensure a respectful environment today, so that everyone feels safe to share their views.
- With those few housekeeping notes in mind, I will now hand over to Carmel.

1.2 Acknowledgement of Country & overview of the licence review

Carmel Donnelly: Thank you, Andrew. Good morning, everyone. Thank you for being here to join us today.

I would like to acknowledge the traditional custodians of the lands that we're meeting on today. For those of us joining us in person, that's the Gadigal people of the Eora nation. I also want to acknowledge the traditional custodians of the lands throughout NSW, and pay our respects to elders, past and present. I would like to extend that respect to all Aboriginal people who are joining us in this public hearing, and indeed all of our Aboriginal colleagues and customers and stakeholders.

Thank you very much for making the time. We really appreciate you joining us either in person or online. I want to say that just because we look a bit formal sitting up here, I don't want you to interpret that as a signal of formality. Certainly, we want you to feel comfortable and welcome in participating today. That is what it is all about.

I will make a few preliminary comments before we get underway to set the scene about why.

We all rely on having good, safe quality water and wastewater services. It's something that people cannot do without. For many of us throughout NSW there is little, if any, choice, in who your provider is. For that reason, the Parliament and Government, in various way, has IPART regulating water businesses throughout NSW.

Sydney Water is a key provider to the people of Sydney and Greater Sydney area, including down to Illawarra, etc. We regulate Sydney Water and other water authorities through a number of different ways. One of them is the licence. And another that is quite important, and that the Tribunal is very aware of, is that we are also setting prices and reviewing prices within a new regulatory framework. I'll come back and talk a little bit about that in a minute.

Within the licence, IPART has a role in:

- auditing and looking at compliance and
- reporting on compliance for authorities like Sydney Water against their licence conditions.

The purpose today is that every 5 years or so, we review that licence to make sure that it's fit for what is needed for now and the coming 5 years and make recommendations to the Minister.

Some of the things that we take into account in the licence is its purpose is to authorise Sydney Water to have a particular role, deliver certain services, and also to set minimum standards. In looking at what should be in the licence, we keep in mind that it is:

- minimum standards and
- authorisation.

There may be other choices that a company like Sydney Water would make in consultation with its consumers to go above and beyond minimum standards. In our pricing reviews we very much consider that above and beyond, and what is it that customers need. And that's above the minimum. In looking at this licence review, we're not saying you can only expect minimum standards, but we are setting the minimum standards.

The Tribunal is very aware that we are in an environment where not only are good water and wastewater services things that people cannot do without, but we also have cost of living pressures. We need to think about what would be the impact on affordability and on people's quality of life if, to use the slang, we were to 'gold plate' the standards. We are considering all of that in this licence review and also what might be role of the elected government, rather than IPART, in coming to our final recommendations to the Minister.

We are partway through this process of looking at what we would recommend about the next licence. We put out an issues paper last year. We have now put our draft recommendations out and a draft customer contract. We have called for submissions, and they will be received up to the 8th of March.

Today is a very important opportunity for people to have their say and for people to ask questions. We are very much about listening and improving from the perspective of the Tribunal's role here and being very informed in how we come to the final recommendations to government. We will consider everything that is being said today and take it into account and then reform our final recommendations and publish a report on that in due course.

Having set that scene, let me end with assuring you we are very, very keen to hear what you have got to say today. This is not about us saying 'well, we've put out our draft recommendations, and now we want to explain them to you'. We will do some explanation, but mostly we're about listening and improving what goes into the final recommended licence conditions.

Thank you again for joining us.

Andrew Nicholls: Thank you for kicking us off today, Carmel.

We thought that it was appropriate, as it is a review of Sydney Water's licence, to commence by having the opportunity to hear from Sydney Water before we turn to our presentations and Q&A sessions. We are really pleased that Mr. Roch Cheroux, the CEO of Sydney Water, is joining us today to give a short presentation.

After that presentation, we will start to present our draft recommendations. We will have 2 Q&A sessions around those recommendations.

Please join us, Roch, if you'd like to give your presentation. You are welcome to come up here or stand there with the microphone.

1.3 Sydney Water presentation

Roch Cheroux: Thank you, Andrew, and good morning everyone.

I would like to start by saying a big thank you to IPART for organising the hearing today and giving us the opportunity to do this short presentation about what we have seen in the initial feedback, and what we would like to discuss as well. This is definitely a key milestone in this licence review, and it is important that we have this conversation today.

Before I start, I would like to acknowledge that we are on Gadigal land this morning. I would like to pay my respect to the elders past and present and also extend this respect to Aboriginal people in the room and also those in the in the virtual room.

Our operating licence is a critical and really important piece in our regulatory framework. This is what gives us the authority to provide drinking water, wastewater, recycled water, and stormwater services to our customers. It also, as Carmel said, sets the minimum performance requirements that we have to meet for our customers. It also includes a very important piece of the relationship that we have with our customers, which is the Customer Contract.

When we as a team started to work on this review, we had a few aims which were that the new licence would value the customers and reflect their views. I'm going to talk about that a bit more now. But it also focuses on outcomes rather than being prescriptive or too prescriptive. We also had an objective that it gives us flexibility. Simply because our environment is changing, and the licence is set for a number of years, but we know that conditions will be changing during the period of the licence. So having flexibility is important to respond to our customers' expectations. And obviously we operate according to the Sydney Water Act. Therefore, it's important that the licence gives us the possibility to operate within the direction of the Act. Thank you.

We were really pleased that IPART has also applied a customer-focused approach to this review. We strongly support IPART's review approach and consider it will help to improve customers' outcomes and outcomes for the broader community. The operating licence reviews really provide us an opportunity to focus on areas of greatest concern or potential gaps that we have got in our customers' and stakeholders' relationship.

We have worked hard on this in the last 18 months or so in parallel with the review. Actually, we started long before that because the formal process started back in July 2022. We started to engage with our customers and stakeholders to ensure that we make a customer-informed submission that reflects our customers' needs and values and will lead to positive customer and community outcomes.

'Our Water, Our Voice' program is the largest engagement program that we have done in our 136-year history. To give you an idea, to date, we have engaged with more than 10,000 individual customers and consumers. Because that's important - that we also listen to our consumers.

That has covered a very diverse group of owners, tenants, and other users of our product and services.

The findings of 'Our Water, Our Voice' have already helped inform many of our proposals for this operating licence review, and obviously it will inform the submission for the next regulatory period. And that covers wide areas that include:

- water quality
- system performance standards and service levels
- climate change and Net Zero carbon emissions and
- our obligation to customers - including providing information and communication, and obviously our customer contracts, which is a key piece in the relationship with our customers.

When we looked at IPART's recommendations (IPART has made 35 draft recommendations in the discussion paper), overall, we consider IPART's draft licence package to be measured and reasonable.

We support many of IPART's draft recommendations. I've got a few of them here:

- In water quality, we support IPART retaining our current standards and removing duplicative and separate licence requirements that we have to comply with (for example, with the NSW Fluoridation Code).
- For system performance, we support maintaining our existing system performance standards and limits. We are pleased to see IPART moving towards a minimum standard approach. Obviously, they are minimum, and in our discussion with our customers we know that they are expecting sometimes more than the minimum standards, and this is exactly what we are going to include in our regulatory submission.
- We also support updating our licence requirements on water conservation in line with the Greater Sydney Water strategy and the NSW Water Efficiency Framework.
- We support IPART's new licence requirements around climate risk-related assessments and management process and reporting on net zero progress. These requirements have been shaped by extensive engagement between IPART, Sydney Water, and many other government stakeholders. It will help to set clearer expectation for Sydney Water in the emerging area of climate risk readiness, which is a critical issue. That is an issue that our customers have raised very clearly with us.
- In customer engagement, we support the requirement to maintain a customer and community reference group and to consult with customers and consumers as part of being a customer-centric business. As you have probably heard me saying, the only reason why Sydney Water exists is because we have customers. So, it is absolutely critical that we listen to our customers and consumers.
- We also welcome retiring our critical infrastructure security licence requirements once the rules of the amended SOCI Act come into operation. This is regulated by the SOCI Act, so we do not need an additional requirement in our licence.
- In stakeholder cooperation and competition, we support maintaining the current requirements and welcome IPART's proposed greater flexibility around the publishing of servicing information.

- And last, but not least, we welcome IPART updating our licence authorisation to reflect current best practice stormwater servicing and to better support Sydney Water's expanded stormwater management role in Western Sydney.

We have some further improvements that we think can be made to IPART's draft licence package to ensure that our operating licence really focuses on outcomes rather than prescription, provides flexibility that we need to operate the business as we have it for our customers, and also so that it is clear and not duplicative with the other regulatory obligations that we have got in different acts and regulation. That will ensure that our operating licence remains relevant and fit for purpose into the future.

A few things I wanted to raise:

- In water planning, for example, we support IPART's proposed requirements around reviewing and updating our long-term capital and operational plan and the Greater Sydney Drought Response Plan. However, we propose some wording changes to better reflect the current practice and also really focus on outcomes and reduce prescription.
- In the climate risk readiness, we recognise IPART's proposed requirement for sustainability disclosures as a stopgap measure only if mandated sustainability reporting is not separately introduced. Sydney Water will be voluntarily seeking to comply with the IFRS sustainable standards. We will seek clarity on whether IPART will treat IFRS sustainability standards S1 and S2 as equivalent to their Australian counterparts as well as which party would be responsible for auditing our disclosures.

So, you can see here it's not a question of reporting or not reporting. It's a question of reporting, but according to which standards and having a clear visibility on which standard and which authority is going to check the reporting. But we do consider that reporting on what we're doing in that space is absolutely critical and requested by our customers.

- IPART has proposed some changes to system performance standards. I will expand on our thinking in just a minute, but we propose retaining the current definition of planned and unplanned water interruption in our customer contract which requires 2 days' notice for residential customers and 7 days for non-residential customers.

Our customer engagement work has shown that customers are generally satisfied with the current service they receive in relation to water continuity. We consider that IPART's proposal to move from 2 days' prior notice to 7 days' notice as the trigger for defining any water interruption as unplanned will have a number of unintended consequences and additional costs. This may actually worsen rather than improve customer value.

Firstly, a 7-day notice period will result in longer waiting period for customers and developers' works in new growth areas, especially if planned works have to be rescheduled due to changes in weather or unforeseen reasons. The periods gives us a lot more possibility to be agile and responsive to our customers.

Also, in some circumstances we may not be able to provide 7 days' notice due to external deadlines for major projects delivered by other parts of Government or other agencies. The analysis of past projects shows that thousands of extra properties are likely to be captured as an unplanned water interruption under the minimum 7 days' period.

And finally, IPART's proposed 7-day notice period may also impact leakage. A longer notice period creates incentives to defer repairs for lower priority leaks until the 7 days' notice is served, increasing the volume of water lost to leaks. Some of these repairs would have ordinarily been completed faster under the current licence requirements. And I'm just thinking about discussions that we have heard during some of our customer engagement program where our customers are saying 'we just hate when we can see a leak running in the street, and it takes so long for you to repair it.' That 7 days would actually potentially increase the delay for us to repair this leak.

- For our obligations to customers, we propose to have greater flexibility around an alternative external dispute resolution scheme. We support keeping information on our policies and procedures up to date on our websites, but we propose flexibility to allow updates and variation to be provided in the next billing cycle after the 10-day business period. Small changes but it will make it easier for our customers to have access to information.
- We do recognise that consumers, and particularly the tenants, are an important part of our customer base. We already provide extensive information to tenants on our website, and therefore we do not support a license obligation to publish separate documents for consumers because they are part of everything we are doing. The customer engagement program that I mentioned, 'Our Water, Our Voice', includes consumers as well as customers. The CCRG (the customer reference group) includes consumers and customer representatives as well. So, consumers are really part of what we're doing already today.
- For our customer contracts, we agree with some of IPART's changes, but we have proposed further changes to:
 - clarify customer responsibilities
 - reflect current business practice
 - enable potential future business changes and
 - simplify the language or improve readability.

In closing, I would like to thank IPART and thank everyone who has come this morning. We really look forward to discussing our proposed improvements in more detail at today's hearing, and we are keen to hear everyone's views. We will use the feedback that we get today to inform the submission that we're going to submit in a few weeks' time.

Thank you.

Session 1

1.4 IPART presentation

Andrew Nicholls: Thank you very much, Roch. We really appreciate you taking the time in setting those responses to our paper out for the benefit of everyone here, and we will have an opportunity to move to Q&A shortly.

But before we do that, I will ask the IPART Secretariat to take you through the draft recommendations for the licence. We are not going to discuss all of the recommendations today. Instead, we'll just focus on the ones that we think are of most interest to you. However, when we get to the Q&A sessions you are very welcome to raise any issues you have about any aspect of the drafts.

We are going to have 2 sessions and an opportunity for a very short break between the 2 sessions. The first session is going to focus on our draft recommendations on water quality and system performance standards and the proposed licence conditions and requirements for undertaking water conservation, long-term water planning and promoting climate risk resilience. We'll then move to Q&A.

The second session will be presenting our draft recommendations on customer and consumer protections within the proposed licence conditions and the customer contract, as well as our draft recommendations for regulating Sydney Water's relationship with Fire and Rescue NSW and its competitors.

That will end the formal presentation. We will then open the floor again for further Q&A. And again, those Q&A sessions will enable you to cover any topic that you see as relevant to the matters we are discussing today.

If we do run out of time to respond to your questions, we are very happy to take them on notice. For those who are online, make sure you get your questions in the chat box, and we will do our best to help you and respond. We will be taking all the feedback we receive today into account when we are reviewing everybody's feedback as part of this process.

Now to commence this session. I will hand over to Sachin Singh and Gudny Palsdottir, who will present in this first session.

First up is Sachin. Thank you.

Sachin Singh: Thank you Andrew and good morning, everyone.

I'll talk about water quality and system performance standards in the licence. The current licence requires Sydney Water to maintain water quality management systems that are consistent with the Australian Drinking Water Guidelines and the Australian guidelines for recycling, and any requirements specified by NSW Health. Our draft recommendation is to retain these requirements.

The Australian Guidelines set the minimum standards for the quality of water that Sydney Water provides to its customers. If Sydney Water meets these standards, it will be able to provide customers drinking and recycled water that is safe for their intended uses.

We have also recommended removing the requirement to comply with the NSW Fluoridation Code. We believe that this duplicates requirements of the fluoridation legislation. Removing the licence requirement will not allow Sydney Water to stop fluoridating its water or stop it from complying with the Code.

Some of you have raised concerns that we won't audit Sydney Water's fluoridation practices if we remove the licence requirement. Let me assure you that we can, and we will, continue to audit Sydney Water's compliance with the fluoridation code through our compliance audits of Sydney Water's drinking water quality management system.

Finally, I'll go on to system performance standards. These standards are in the licence to help minimise service interruptions to customers. These include standards for water continuity, water pressure and wastewater overflows. Minimising these interruptions is important both in terms of maintaining reliability of essential services to customers and protecting public health from excessive wastewater exposure.

In the draft licence, we have proposed retaining the current system performance standards with no changes to the levels of service that Sydney Water must provide. It is our view that they appropriately balance safety and reliability of services for customers with the costs required to meet the standards. These costs are ultimately borne by the customers. Therefore, our draft recommendation is not to change the standards, but we are seeking your feedback about this.

Thank you. I will now hand over to Gudny Palsdottir who will present our draft recommendations for the water conservation, efficiency and long-term planning requirements in the licence.

Gudny Palsdottir: Thank you, Sachin.

Water efficiency and water conservation are NSW Government priorities as identified in policies such as the NSW Water Strategy and the Greater Sydney Water Strategy. We have proposed conditions in the draft licence requiring Sydney Water to take water conservation actions, supporting the government's objectives.

Sydney Water has developed a 5-year plan explaining the water conservation projects that Sydney Water has selected to implement. It is our draft recommendation that Sydney Water should maintain and implement this plan, reviewing it every year to keep it up to date.

We have also made draft recommendations requiring Sydney Water to undertake long-term planning to meet Sydney's needs for water and sewerage services into the future, consistent with the goals of the Greater Sydney Water Strategy:

- We propose that Sydney Water should be required to engage in ongoing water supply augmentation planning and drought response planning together with WaterNSW. WaterNSW supplies bulk water to Sydney Water who then supplies treated water to its customers. It is important that the 2 agencies work cooperatively to respond to changes in water demand from customers, as well as changes in environmental conditions (such as climate change and drought).

- An example of supply augmentation that Sydney Water currently undertakes is using desalinated water to supplement Sydney Water's drinking water supply. To support this, we have recommended in the draft licence that Sydney Water must make requests for the volumes of water that it needs from the Sydney Water Desalination Plant in accordance with the Decision Framework for the plant's operation.

Sydney Water makes annual production requests to the Sydney Desalination Plant for how much water it needs, which the Plant then provides to supplement Sydney Water's drinking water supply. The Plant must produce what Sydney Water has requested but only if these requests are consistent with the principles set out in the Decision Framework.

We consider that our proposed new licence requirement for Sydney Water to comply with the Decision Framework will support better coordination between Sydney Water and the Sydney Desalination Plant. It will also mean that it is transparent to the community that Sydney Water is only using the Plant as much as necessary to meet demand.

- And finally, we propose in the draft licence that Sydney Water should be required to have a Long-Term Capital and Operational Plan. This Plan sets out Sydney Water's key infrastructure and operational decisions and provides the long-term context for future pricing proposals to IPART. We would expect this context to include information about the assumptions that Sydney Water has made to develop its long-term investment plans. Sydney Water should provide any relevant supporting evidence to inform the price review.

Thank you. I will now hand back to Sachin who will present on our draft recommendations for the climate risk readiness requirements in the licence.

Sachin Singh: Thank you, Gudny.

Climate change is already having a significant impact on the services that Sydney Water provides and it will continue to do so into the future. Global initiatives and solutions are being developed and Government action at both State and Federal levels are also underway, providing an evolving and challenging landscape for setting any related licence conditions.

Our draft recommendations seek to encourage Sydney Water to identify its climate change risks and manage these effectively. We have been mindful that prescriptive licence conditions could limit Sydney Water's ability to respond to climate-related risks and to take up adaptation and resilience solutions as these emerge.

To support Sydney Water's efforts to address climate change risks with sufficient flexibility, in the draft licence, we have proposed a new requirement for Sydney Water to have a climate-related planning and risk management process that's consistent with the NSW Government's preferred approach set out in the NSW Climate Risk Ready Guide. Under the draft licence, Sydney Water would be required to undertake planning and risk management to achieve a maturity target of embedded as set out in the Guide, and then progress towards advanced.

We have also proposed a new requirement in the draft licence for Sydney Water to publish annual climate-related disclosures that is consistent with the International Financial Reporting Standard on climate related disclosures. Sydney Water would be required to disclose its climate-related risks and opportunities that could reasonably affect their ability to meet their objectives as a water utility business. However, these reporting requirements will only apply from 1 July 2025, and if it is not required by other legislation.

Governments and public sector entities are also subject to climate-related opportunities and risks, the same as private sector corporations. As markets and regulators demand more comprehensive disclosures from the private sector, it is important that similar requirements apply to comparable public sector entities. While making disclosures does not require Sydney Water to act, we consider that the transparency brought about by detailed public reporting could provide an incentive to drive down the risks and keep Government and the community informed. Further, it could build community confidence that climate risks are being managed.

Thank you.

1.5 Q&A session

Andrew Nicholls: Thank you very much, Sachin and Gudny, for those presentations.

We have a little bit of territory there, and now it's the opportunity to hear from those of you who are attending today's hearing, whether you are here online or joining us in the room. I will do my best to make sure I'm covering both as best we can.

It is an opportunity if you have got any questions on our draft recommendations about water quality and system performance standards, or about water conservation and long-term water planning or climate risk readiness. I encourage you to share your views or ask your questions at this point.

And again, if you are representing an organisation, if you could not only say your name, but also say the organisation that you're representing.

Marie Minslow: Good morning. My name is Marie Minslow. I'm representing Scotland Island Residents Association. Mr Cheroux, we are a gap in your service. We are not a direct customer. We are a secondary customer, but we are not a direct customer. And, Ms Donnelly, we do not get good safe quality water and wastewater.

Scotland Island is located in the southern area of Pittwater. It is 400 meters from the main sewerage line at Bayview Church point. And we rely on individual septic systems. We rely on tank water from our roofs, and we get an emergency water supply which is bought from Sydney Water by Northern Beaches Council and passed on to us at the Sydney Water price to top up our systems.

A recent feasibility study reinforced a previous study that demonstrated that Scotland Island does not have a suitable terrain for onsite sewage systems. It has a very, very small topsoil base and it is clay. And those septic systems overflow. They cannot be directed into trenches easily. The trenches fail on a regular basis and there is a continual stench on the island, particularly during heavy rainfall and puddles of water along the roads. The septic systems on the island are not suitable for that terrain. We need to be connected to the mains sewerage program.

Scotland Island is also a heavily wooded area with spotted gum forests, and those forests are protected so collecting water on the roof is a problem for many, many households. The water that we get from Northern Beaches Council is non-potable. It does not meet the criteria of a safe quality water system.

I implore Sydney Water to continue to have a priority sewerage program in their licence agreement, and that Scotland Island is part of that priority sewerage program. We realise that that does not necessarily guarantee connection for water and sewerage to the island, that that is the province of the Minister. However, we believe that the priority sewerage program is an important step in this direction because Ministers come and go. My apologies to any members of government here but Ministers come and go, as do governments, and we require that there still be visibility that Scotland Island requires good safe water and an appropriate sewerage program.

Thank you.

Andrew Nicholls: Thank you very much, Marie. I'm happy to take that as a comment but would somebody like to respond?

Carmel Donnelly: I would like to thank Ms. Minslow (Marie) for being here. We are certainly taking all of that on board and we will give it some thought.

We were not thinking that taking it out of the licence was going to mean there was not a priority sewerage program that the government would pursue. We were alive to the fact that it has been in the operating licence without leading to there being services extended to Scotland Island. So that was our thinking about whether the licence is the right place for that issue to be addressed.

But I do take on board your comments and we will give them consideration. Thank you very much.

Andrew Nicholls: Thank you. Any other questions or comments/feedback? I've got another one on the floor here. I encourage people online as well to let us know if you have got a question.

Kurt Dahl: Kurt Dahl, I'm the CEO of coNEXA. We are an investor in water and wastewater infrastructure. We recycle about 10 billion litres a year of recycled water and we have got assets in Sydney and Newcastle.

Our interest in the operating licence for Sydney Water is how we interface with that licence. It is important for us to have certainty when we interface with that licence and interface with Sydney Water. That certainty enables us to then invest in in new infrastructure. So, our main areas of interest are around water conservation and also the interface with competitors (and also servicing information that we'll cover in the second session).

When it comes to water conservation, it is an obvious role for Sydney Water that they are leading a lot of those conversations around water conservation, and they have an important role. But we would like the licence to also reflect that there are many other organisations that can deliver water conservation outcomes in Sydney, and if they are delivered, they are good things for the broader Sydney Water drinking water customer base.

We will make a written submission and detail all our thinking in a couple of weeks' time, but we do not want it to be ambiguous about how those water conservation projects might be done independent of Sydney Water, or together with Sydney Water. We have got live examples where there seems to be a challenge around Sydney Water looking at its lost potable water revenue. If that is offset by recycled water revenue that they receive, that's great. But if the recycled water revenue goes to a third party, it can trigger unusual pricing positions. We would like to see that that type of thing addressed.

Andrew Nicholls: Thank you, Kurt. Carmel?

Carmel Donnelly: Thank you and thank you, Kurt. We will take that on board. One of the things that you have mentioned is that you would have some examples that you can put into your submission. That would be very welcome. It does really help us to understand the practical circumstances.

I will just say more broadly for everyone online and everyone here who is thinking about putting in a submission: it is very helpful to the Tribunal if you can show us and tell us about the real examples that you have.

Thank you and thanks, Kurt.

Andrew Nicholls: Thank you very much, Kurt. I'll take another question from the floor here.

We don't so far have any questions online. I encourage you if you're online, please drop either your question into the chat box, or just drop your name in to say that you've got a question, and I'll come to you shortly.

First, I'll take the question from gentlemen on the floor.

Paul Byleveld: Thank you. Paul Byleveld, NSW Health.

I thank IPART and I thank Sydney Water for their work on the review of the operating licence. I would like to make it known that NSW Health does not support the removal of the obligations in relation to fluoridation from the operating licence. This has been a longstanding position of NSW Health, I understand, since Sydney Water's corporatisation in 1995.

NSW Health considers the licence to be the most appropriate mechanism to set out key government requirements of public interest in a succinct and accessible form. NSW Health does not consider the requirement to be a duplication as NSW Health does not currently have a separate audit program for the major utilities in relation to drinking water fluoridation. We would need to consider, if the requirement was removed, what options may be available to NSW Health, which may include amending the instrument of approval for Sydney Water to fluoridate and placing audit conditions in that instrument.

I'm interested in Sachin's comment in relation to how the fluoridation requirements might be picked up in an audit of the broader drinking water quality management system. I would need to look more closely at the drinking water quality management system to understand how it currently addresses the fluoridation requirements and indeed, whether that is the case.

Thank you.

Andrew Nicholls: Thank you very much.

Carmel Donnelly: Thanks, Paul, and thanks very much for speaking up and being candid.

I think that gives us an opportunity to actually work through what is the best outcome here. We were not intending, with the draft recommendations, that there was going to not be fluoridation or not be auditing of its compliance with appropriate standards. What we were thinking about was it duplicating, or is there some direction from NSW Health that we're doubling up with.

I welcome your comments there that you would work with us to understand more about the drinking water quality management system, whether it covers it. From IPART's perspective, we will make sure that we understand NSW Health's concerns and consider them very carefully.

Thank you, Paul.

Andrew Nicholls: Thank you very much, Paul. Other questions or comments? We've got some broad-ranging topics here. Anyone online like to ask a question?

Carmel Donnelly: I'll just make a comment. You can see that I've got my laptop here. I've got all sorts of devices, and I'm just really helping Andrew by watching if anything is up on the chat. I'm not on Facebook, or any other - not to back one social against the other.

Andrew Nicholls: That's right. Not that we would ever do that at IPART.

We are trying to juggle multiple technologies here to get this hybrid session to work. We encourage those who are online, you are absolutely part of our hearing today and we really want to hear from you as well, so please jump in. If you are shy, you can drop your questions straight into the chat and we'll read it out and respond to it. If you are not shy, we are very happy to hear from you as well.

They are broad ranging topics, and I would think they are pretty relevant to the licence: water quality system performance standards, water conservation, long term water planning and climate risk readiness. Are there any questions or comments or concerns with what's being proposed by IPART?

If not, I feel a little bit like an auctioneer when there's no one bidding. I think we will roll on if we have got no more questions. We will have after this next session the opportunity to go straight to Q&A.

Session 2

1.6 IPART presentation

I will now go to our next staff speaker, Alex Jenkins, who will lead us on the second session around customer and consumers, and the relationship with the Fire and Rescue NSW.

Alex Jenkins: Thank you, Andrew and good morning, everyone.

I will first take you through our draft recommendations for customer and consumer protections in the licence and customer contract.

The current licence includes terms and conditions that aim to ensure that Sydney Water provides a minimum level of service to its customers. We have recommended only a few changes to these conditions in the draft licence as we consider that they are generally working quite well.

The licence also includes a Customer Contract which provides important protections for Sydney Water's customers. We have proposed relatively minor changes in the draft Customer Contract, largely to improve readability and ease of understanding.

We have proposed in the draft licence to require Sydney Water to extend some of the protections it currently provides to its customers also to consumers of Sydney Water's services. These consumers aren't customers.

Sydney Water's customers, under the Customer Contract, are owners of properties connected to Sydney Water's services. Whereas residential tenants who use Sydney Water's services but do not own the properties that they reside at are consumers and not considered customers. Sydney Water already extends some of the protections it provides to its customers to these consumers, such as for payment assistance. But we think that additional protections, such as providing consumers rebates and allowing for redress, will provide a greater level of assurance that consumers are protected.

At the moment, it is the licence and Customer Contract which explain the protections in the Customer Contract that apply to consumers, but this can be confusing. For clarity, we have proposed that Sydney Water should publish a separate document which clearly states all of the protections available to consumers.

In our Issues Paper that we published in June last year, we also proposed that there could be benefits of having a direct billing relationship between Sydney Water and tenants, where tenants would pay water usage charges. This would be in place of the current arrangement in which landlords recoup the charges from their tenants. Representatives of community groups raised concerns, on behalf of their constituent renters, that many renters avoid accessing payment assistance for water bills because of the perceived risk to their housing security from disclosing payment difficulties to their landlord. Community groups expressed a view that this risk would be reduced and other benefits realised if tenants were to be billed directly by Sydney Water for their water usage.

We have not recommended changes to Sydney Water's licence or Customer Contract to address this concern as it cannot be addressed through changes to these documents alone. If the NSW Government were to consider a policy change and the necessary legislative changes to give it effect, we could advise on the costs and benefits as well as any practical implication of those changes.

Finally, we have made draft recommendations to require Sydney Water to have processes to effectively identify its customers and consumers who are experiencing family violence. We consider that it is important that providers of essential services take actions to reduce risks for vulnerable customers. To support this, we have proposed to define family violence in the licence so that those requiring assistance will be able to self-identify. Customers must be identified accurately if Sydney Water is to make protections available to them.

We also propose that the licence should require Sydney Water to ensure that customers can nominate when and how they can be contacted, so that they are not contacted at times or through communication methods that could inadvertently increase their exposure to family violence.

Now I'll take you through our draft recommendations for regulating Sydney Water's relationship with Fire and Rescue NSW and its competitors.

Fire and Rescue NSW is Sydney's urban fire and rescue service, and it relies on Sydney Water's water supply network for urban firefighting. It is important for Fire and Rescue to be aware of the water pressure and flow rates available at a location before they arrive at an emergency. This lets Fire and Rescue plan for if it needs to bring back-up water, or if the water available in Sydney Water's network is enough.

Therefore, in the draft licence, we have recommended new requirements for Sydney Water to provide water pressure and flow rate information at all fire hydrants in its water supply network to Fire and Rescue within the specified timeframes. We understand that Sydney Water does not have all of this information ready to give to Fire and Rescue NSW, but they are working on collecting it as a priority. This relationship can be managed through the memorandum of understanding between the 2 agencies, currently required by the licence. However, our view that we are consulting on is that enforceable requirements in the licence could be beneficial. Further, it will help to minimise any potential delays in Sydney Water providing the information to Fire and Rescue, such as if there are competing priorities.

The other topic I want to talk to you about today is about providing servicing information to Sydney Water's competitors, whether that be current competitors or new potential ones. Sydney Water is a monopoly water supplier. However, under *the Water Industry Competition Act 2006* (NSW), or WIC Act, private water utilities can provide water services within Sydney Water's area of operations and directly compete with Sydney Water. This is a good thing because it means that customers have more options for receiving a water supply services and other water services within the Sydney region.

To ensure transparency between water utilities, Sydney Water's licence currently requires it to publish servicing information on its website about its water and wastewater systems. That is, Sydney Water must publish the current and projected demand as well as any capacity constraints, and the costs of alleviating these constraints. We propose to retain these licence requirements as this servicing information aims to provide potential new market entrants with the information that they need to make an informed investment decision. Having adequate servicing information makes it more likely for a new water utility to succeed, thereby encouraging competition and options for water utilities for customers.

However, we have proposed some flexibility in the draft licence so that if Sydney Water includes the required information in its Developer Service Plans on its website, that will meet the requirements of the licence condition. Sydney Water does not need to publish a separate document with the same information unless any information required by the licence was not contained in these Developer Service Plans.

Thank you, and back to Andrew.

Andrew Nicholls: Thank you very much, Alex.

Just before we move to Q&A, we are very pleased to have with us 2 guest speakers who will give a presentation from their respective organisations. First, we have Ms Janine Young, who is the CEO of EWON (who is the Energy and Water Ombudsman of NSW), and then Mr Kurt Dahl, who we heard from already, from coNEXA, who would like to make some comments about these topics.

Please join us, Janine.

1.7 Energy and Water Ombudsman NSW presentation

Janine Young: Thanks, firstly, to IPART for giving me the opportunity to make an opening statement.

EWON's constitution and charter requires us to:

- handle complaints fairly, informally and expeditiously, without charge to the person making the complaint,
- promote EWON to consumers and small business, whether that be in Sydney or beyond Sydney and out to all the different places across NSW, and
- encourage and provide advice to members about good complaint-handling practices and systemic issues so that they can actually reduce the cause of complaints.

Our work adheres to the national benchmarks for industry-based Ombudsman schemes, independence, accessibility, accountability, fairness, efficiency and effectiveness. We are reviewed every 5 years independently against those benchmarks.

Today, I want to speak about 3 key issues arising from our IPART submission, and from Sydney Water's response. They were just mentioned earlier (or some of them):

- the rights of tenants
- vulnerability and

- external dispute resolution.

The rights of tenants (known as consumers rather than Sydney Water customers)

Tenants, as we know, are not direct parties to the customer contract. Instead, they receive water charges from their landlord without receiving information about free, fair, and independent advice that is available from my office.

Research indicates that 1 in 7 tenants will not complain or request a repair at a fear of adverse consequences, including eviction. A tenant with a high water bill, affordability issue, or a concealed leak is therefore unlikely to complain to their landlord, their water provider or EWON. This contributes to the cost-of-living divide between property owners and tenants.

EWON strongly supports IPART's draft recommendation to retain the current licence conditions that extend protections to the customer contract to tenants, and to include a new condition requiring Sydney Water to produce a separate explanatory document specifically for tenants which sets out their rights. It's a great step forward. But in our view, a formal review of the water sector, focused on developing equitable consumer protection framework for both property owners and owners and tenants, should seriously be considered by government and water providers.

Moving on to vulnerability

As everyone knows through cost of living, there are more and more people who are experiencing, or at risk of experiencing, vulnerability.

We welcome IPART's proposal to include new reporting obligations requiring Sydney Water to report on the number of complaints received each financial year, as well as the number of customers who are impacted by family and violence or on payment assistance plans.

Reporting structure is critical. Separate reporting of the issues that property owners raise, and tenants raise would position Sydney Water and IPART to identify and address circumstances contributing to vulnerability for these 2 different sectors, because they are not the same.

We also welcome IPART's recommendations to retain current Sydney Water conditions relating to maintaining and fully implementing payment assistant options for property owners and tenants, and to publish information about available payment assistance options.

Sydney Water has undertaken commendable work with respect to the program of payment assistance options. But more awareness-raising work about payment assistance needs to be done. Many customers do not get the support that they need. Many do not know that they can ask for support.

A new, separate explanatory document, setting out rights, providing information about payment assistance and access to advice and information, including from EWON, would be a great step forward, and we are happy to sit around that table and contribute to the development of that work.

In 2020, IPART changed the structure of water charges for Sydney Water, Hunter Water and WaterNSW by introducing a dynamic water use flexible pricing structure which varies water pricing with dam levels, meaning that consumers pay a higher price for water usage if dam levels fall below 60%, and increasing the usage charge and reducing fixed service prices in all periods. We strongly recognise the benefits of this approach during drought. We need to save our water. But at the same time, it does decrease affordability of order services for customers experiencing, or at risk of experiencing, vulnerability, including large families. More work on rebates and conditions and concessions are required.

IPART has asked Government to consider restructuring the pensioner rebate to reduce the bill impacts of dynamic pricing, and has also noted that Treasury, the Department of Planning, Industry & Environment and Sydney Water have stated that they will all ensure that pensioners are not made worse off. We strongly support this shared position and again would welcome the opportunity of participating in consultation work associated with rebate and concession alignment with changing water pricing.

Finally, I want to talk about external dispute resolution.

That is the service that EWON provides. We are responding to Sydney Water's request for exploring establishment of an alternative water ombudsman scheme. IPART has made a draft recommendation requiring Sydney Water to be a member of EWON and to publish information about EWON and its services to customers.

Not surprisingly we support that position. But it is not just because EWON wants to remain the Energy and Water Ombudsman for NSW. It is because access to free, fair, and independent external dispute resolution is critical for essential services.

Our views are informed by the Productivity Commission's access to Justice report of 2014 and Commonwealth Treasury's review of the Financial Services complaints framework, aligned with the Royal Commission that provided strong guidance with respect to ombudsman schemes. It said that there should be very careful consideration about creating new ombudsman services where they already exist, and that creating competition between ombudsman services is not in the best interest of consumers. In my experience, it would not be in the best interest of the water sector or Sydney Water, because I strongly believe it will put customer trust at risk.

Water complaints are very different from the thousands of energy retail complaints we receive each year. To the credit of Sydney Water, we receive very few straightforward billing complaints. They are really good at resolving those. The water complaints that we receive have a higher overall level of complexity. They comprise both network and retail issues. They involve land access and damage, easement issues and sometimes sewerage – which are not fun to resolve.

This was taken into account during EWON's 2022-23 funding model review. It resulted in industry sector fixed fees being introduced for members based on EWON's work for each different sector. This includes complaints, submissions, workshops, presentations like this, and outreach and engagement. Complaint fees are set based on each sector's contribution to our operating expenditure and are then based on each member's complaint volumes, and the level of each investigation is based on the member's prior contacts.

Sydney Water has put a view forward that it believes a lower cost water ombudsman scheme could be established. To date, I have not heard of development of a business case that evidences that this could be achieved, keeping in mind that any water ombudsman scheme would need to meet those same benchmarks that EWON is required to meet and undertake that full-service work of an industry ombudsman. If the water sector looks to undertake this work, we would be happy to sit at the table and contribute to it. It could be well worth exploring, because we might find opportunities for streamlining our services and efficiency and effectiveness improvements.

In finishing, EWON welcomes scrutiny. We value high accountability and transparency. Our next independent review is due later this year, and Sydney Water and IPART will be key contributors as part of that review to the consultation process, and therefore our ongoing effectiveness and efficiency drivers.

Thank you.

Carmel Donnelly: Thanks, Janine. I would like to acknowledge the important work of EWON, and particularly say how we appreciate you putting the time to put together your views and share them so that it's out there, and people can think about what you've had to say.

I will add that the Tribunal does from time to time, in undertaking its work, get broader input and have issues raised that are a little bit out of scope. For instance, if something is not appropriately fixed in the licence but it might be a broader matter, the Tribunal does from time to time make broader recommendations.

Even in the last year or so, we have twice recommended to government that there be a review of the pension and rebates for water. I want to acknowledge that you said that and reminded us, and we will take into account any feedback that we get, not just from EWON, but from anyone at all in your submission.

We consider all the submissions. We do sometimes hear from people who say, 'I know this is not what you are reviewing now, but I want you to know about this other concern'. The Tribunal will take into account whether or not it is an opportunity for us to bring it into another area of our work or put forward some suggestions to government that are in addition to the current review. So, we are listening. Thanks, Janine.

Andrew Nicholls: Thanks, Carmel. Kurt, did you want to come up here or happy for you to do it there?

Kurt Dahl: Here - less formal.

Andrew Nicholls: No problems.

1.8 CoNexa presentation

Kurt Dahl: I wanted to address 3 parts.

I'll come to the maps first - the servicing information maps. As I said in my opening comments, one of the things that we need is certainty when we're looking at opportunities.

The reintroduction of developer charges are radically changing the landscape. In particular, people seeking different servicing options in Western Sydney. That has not been apparent in the last 5 years since those servicing information maps have been published.

We are having a number of conversations with developers who are looking to activate land and we are all aware of the pressure to activate new land at the moment in NSW. So, the first thing we would say is that those maps are not sufficient:

- They do not provide enough guidance to someone like coNEXA to look at what the current capacity is, not just the projected capacity.
- It identifies capital spend but it does not talk to what that capital spend delivers in terms of extra capacity.
- The maps are colour coded which talks about whether it's at capacity, whether it's got wet weather issues or if there's capacity available. So that good high-level information, but nowhere near enough information to inform investment decisions which was highlighted there before.

We will detail the type of information that we would like to see in those maps.

The second point around those maps is they need to be long-term. 10 years is okay, 5 years is not enough if it was to be reflected just in the developer charge. We do want that long-term view of likely servicing costs. We are not asking Sydney Water to crystal ball it to 2 decimal places but still provide good signals where there are opportunities to do something different.

We are looking at a servicing area in Sydney at the moment where the developer charges in the last 12 months ranged from an initial \$90,000 a lot to, at the end of last year ended up at \$800 a lot because of the way the boundaries were drawn and what was included. That same community went from not being able to be serviced - to being able to be serviced - to not being able to be serviced again, and nowhere near in the time frame that the developer was seeking.

That flip-flopping of information and cost, it does not provide the certainty that we are seeking. We are going to ask for less ambiguity and more firm information. Given that those maps and that information is published for our benefit as a potential competitor and alternate service provider to Sydney Water, I think we need to have a strong voice in what those look like.

A second piece was just the services that are listed in the operating licence at the moment that are available to WICA (the *Water Industry Competition Act 2006*) licensees go to the provision of drinking water, the disposal of wastewater and stormwater is a new service that's detailed in the licence. The one that's missing for us at the moment is sewer mining. That is not the disposal of wastewater, that is accessing sewage or treated effluent, and we think that is a gap. It is certainly a service that Sydney Water provides, but it is not clearly captured in the good faith provisions that are required in the dealing with a WICA licensee. We would like to see all of the services that we are interested in accessing be covered by that good faith provision.

While I'm talking about that good faith provision, it is also not clear if the negotiations around those services were to break down and the party seeking the services thought the negotiations were not in good faith, what is the mechanism after that? We would like some clarity around those things.

Ultimately, as an investor, when you talked about the cost of living before, we are looking to deliver outcomes and infrastructure that's good for the community. Whether that's an extra service that we can provide that Sydney Water cannot or a provide lower cost service (whether that is a capital or operating cost).

When we look at any of these clauses in the operating licence, we are looking at the intent of the clause, whether it's water conservation or competition, and then fast forwarding that or putting that into the context of what outcomes it is currently delivering.

Thank you for the opportunity to speak.

Carmel Donnelly: Thanks, Kurt. I've made some notes on that, and I look forward to your submission. The Tribunal will take it all into account. Thanks.

1.9 Q&A session

Andrew Nicholls: Thank you very much. Kurt.

We are now throwing open again to the floor here, and for those who are online. I should also add that if Roch or our Sydney Water colleagues here wanted to add any points or respond to any points, you are also very welcome to do so as part of these sessions and I'll check in with you at the end if there's anything you wanted to say specifically.

But is there anyone who's got any other questions or comments at this point? Anything on customer and consumer protections and licence conditions, the relationship with Fire and Rescue NSW and some of the other ideas that we have presented here today?

Somebody on the floor.

Laura Ansted: Hi, it's Laura Ansted. I'm from the NSW Environment Protection Authority.

I understand that one of the recommendations made by IPART is to reinstate a 2-yearly state of the assets requirement in terms of reporting. The EPA (Environmental Protection Authority) holds concerns in relation to Sydney Water's rate of renewal for some of its assets, particularly its critical network assets, such as rising mains and pumping stations.

We understand that between approximately 2012 and 2021, Sydney Water renewed less than one kilometre of rising mains, and we understand that that period of time was the period of time where the state of the assets report was being provided to IPART.

We consider that greater oversight, visibility and accountability may be required in relation to rate of renewal, particularly in the context of an ageing asset base, with an end of service lives horizon. You do not want to get to a point where they all need to be renewed at once, and you do not have the capability to do that.

We consider that potentially the reporting requirements under the state of assets report may need to be amended to provide greater visibility specifically for renewal of those assets to IPART.

Andrew Nicholls: Thank you. Any comments or response?

Carmel Donnelly: Thanks, Laura. We'll take that on board. Thank you.

Andrew Nicholls: Thank you. Alright, any other questions. Anyone online? We haven't had any online questions yet. I'm sure there must be some burning comments or questions.

Anyone there online, if not, anyone else in the room? If not, this looks like it's going to be a very quick auction.

Before we move to wrap up, I wanted to ask Roch or any of the Sydney Water team were there any points or comments you would like to make today before we close out?

Roch Cheroux: No specific comment. Just thank you for your feedback and we obviously we will take that feedback.

Andrew Nicholls: Thank you.

For those online, Roch was just acknowledging that he will, he's very happy to take on notice the comments that have been made today and have a think about them.

Alright, well, I'll just do one last call for questions, if not, going, going, gone. The auction is wrapping up. Thank you very much for the opportunity today to hear from you and to hear the different views of our presenters. We do very much value the time that people take out of their busy days to come to these sorts of hearings, but it's out of these processes that we certainly get some great feedback.

Again, if you do have any questions that you would like to raise with us if you're online, still drop them into the chat, you can email us, and again we're encouraging submissions. If you have not raised your concerns today, or if after today you think of something else, please make sure that you provide that to us. We're very much interested in getting your views.

On that note. I will now hand back to Carmel to make some closing remarks.

1.10 Closing remarks

Carmel Donnelly: Thank you, Andrew.

We are about to pop up a QR code and that's because we like to know how we're going with these hearings. If you would like to, you could go into Menti and we have got a few short questions that give you the opportunity to give us feedback about how we're consulting.

While that is happening, I will say a few words. I particularly want to thank you on behalf of IPART for making the time and participating today. It has been very constructive, and it has been very helpful for us. We recognise the time that you take is an opportunity cost, and particularly for people who have prepared what they want to say and given a lot of thought. I hope it has been useful for you, as it has been very helpful for us.

As we mentioned earlier, a transcript of today's proceedings will go up on our website in the next few days and we will consider everything that has been said today in coming up with our final recommendations.

I will reiterate what Andrew said. If you would like to talk with someone, if there is further input that you want to have, the contact details are in our discussion paper and on our website. You can get in touch with the IPART team, and you are most welcome to do that.

Thank you very much. We look forward to getting this review completed - getting your submissions by 8 March 2024 and then making our recommendations to the Minister.

Thank you.

Andrew Nicholls: That brings us to our end, and thanks for those online as well. We will wrap up at this point.

Thank you.