

Rosehill Network Pty Ltd

and

AquaNet Sydney Pty Ltd

Licence Plan Audit – Combined Report

Independent Pricing and Regulatory Tribunal

18 April 2021

Document History

AquaNet Sydney Pty Ltd

Licence Plan Audit – Combined Report

Independent Pricing and Regulatory Tribunal

The report contact is Dan Deere (dan@waterfutures.net.au; 0409 283 737) and the document has been issued and amended as follows:

Version	Date	Description	Created by	Checked by	Approved by
1	19 December 2020	Internal draft	Dan Deere	Jim Sly	
2	8 February 2021	Draft report	Dan Deere and Jim Sly	IPART, Water Utilities Australia and Veolia	
3	18 April 2021	Final report	Dan Deere	Dan Deere	Dan Deere

Contents

1. Executive Summary	1
1.1 Auditor Declaration	1
1.2 Major Findings	1
1.3 Recommendations	1
1.4 Conclusion	1
2. Introduction	2
2.1 Objectives	2
2.2 Licensee's Infrastructure, Systems and Procedures	2
2.3 Audit Method	3
2.4 Regulatory Regime	4
2.5 Quality Assurance Process	4
2.6 Audit Findings	4
3. Infrastructure Operating Plan	5
3.1 Summary of Findings	5
3.2 Review of Actions	5
3.3 Opportunities for Improvement	5
4. Water Quality Plan (Non-potable Water)	6
4.1 Summary of Findings	6
4.2 Review of Actions	6
4.3 Opportunities for Improvement	6
5. Retail Supply Management Plan	7
5.1 Summary of Findings	7
5.2 Review of Actions	7
5.3 Opportunities for Improvement	7

Appendix A	Detailed Audit Findings – Infrastructure Operating Plan (IOP)	9
Table A.1	IOP Audit Table – WIC Reg Sched 1 cl.6(1)(a)	11
Table A.2	IOP Audit Table – WIC Reg Sched 1 cl.6(1)(b)	13
Table A.3	IOP Audit Table – WIC Reg Sched 1 cl.6(1)(c)	15
Table A.4	IOP Audit Table – WIC Reg Sched 1 cl.6(1)(d)	17
Table A.5	IOP Audit Table – WIC Reg Sched 1 cl.6(1)(e)	19
Appendix B	Detailed Audit Findings – Water Quality Plan (Non-potable Water) (WQP (npw))	21
Table B.1	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 1	23
Table B.2	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 2	25
Table B.3	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 3	27
Table B.4	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 4	29
Table B.5	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 5	31
Table B.6	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 6	33
Table B.7	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 7	35
Table B.8	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 8	37
Table B.9	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 9	39
Table B.10	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 10	41
Table B.11	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 11	43
Table B.12	WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 12	45
Appendix C	Detailed Audit Findings – Retail Supply Management Plan (RSMP)	47
Table C.1	RSMP Audit Table – WIC Reg Sched 2 cl. 7A(l)(a-c)	49
Table C.2	RSMP Audit Table – WIC Reg Sched 2d. 7A(1)(d)(i-ii)	51

1. Executive Summary

1.1 Auditor Declaration

This report presents the findings of a Licence Plan Audit of the compliance of Rosehill Network *Infrastructure Operating Plan*, *Water Quality Plan* and AquaNet *Retail Supply Management Plan* with the relevant provisions of the *Water Industry Competition Act 2006* and the *Water Industry Competition (General) Regulation 2008* as they relate to the distribution component of the recycled water scheme at Rosehill. The treatment plant component of the scheme is outside the scope of this audit.

The auditor confirms that:

- the auditor was provided with sufficient evidence on which to base the conclusions reached during the audit;
- the audit findings accurately reflect the professional opinion of the auditor;
- the auditor has conducted the audit, determined the audit findings and prepared this report in accordance with the requirements of the *WIC Act Audit Guidelines*¹ and the provisions of the Audit Deed; and
- the audit findings have not been unduly influenced by the Licensee and/or any of its associates and express the auditor's opinion as to whether the Licensee has met the Licence conditions and regulatory requirements as specified in the scope.

1.2 Major Findings

The Licensees, Rosehill Network Pty Ltd and AquaNet Sydney Pty Ltd, were found to have documented the arrangements in relation to the design, construction, operation and maintenance of the recycled water scheme in full compliance with the assessed audit criteria. No non-compliances were identified.

1.3 Recommendations

No recommendations have been made as a result of this audit.

One opportunity for improvement, which the Licensee may wish to consider, is identified in the body of the report.

1.4 Conclusion

In the opinion of the auditor, the licence plans (*Infrastructure Operating Plan*, *Water Quality Plan* and *Retail Supply Management Plan*) adequately document the arrangements in relation to the design, construction, operation and maintenance of the water infrastructure within the scope of Network Operator's Licence No: 09_002 and Retail Supplier's Licence number 10_01R. The documented arrangements are adequately compliant with the relevant guidelines, standards and legislative requirements.

¹ IPART, *Audit Guideline; Water Industry Competition Act 2006*, July 2020.

2. Introduction

2.1 Objectives

This report presents the findings of a Licence Plan Audit undertaken for the Independent Pricing and Regulatory Tribunal (IPART) under the provisions of the *Water Industry Competition Act 2006*.

The objective of the audit was to assess compliance of the Rosehill Network Pty Ltd's licence plans (*Infrastructure Operating Plan*, *Water Quality Plan*) and AquaNet Sydney Pty Ltd's licence plan (*Retail Supply Management Plan*) with the provisions of the relevant legislation (the *Water Industry Competition Act 2006* and *Water Industry Competition (General) Regulation 2008*) as it relates to the distribution component of the recycled water scheme at Rosehill. The scheme is operated pursuant to the conditions of Network Operator's Licence No: 09_002 and Retail Supplier's Licence number 10_01R.

2.2 Licensee's Infrastructure, Systems and Procedures

The infrastructure, systems and procedures subject to audit are those related to the distribution component of the recycled water scheme (the Scheme) at Rosehill (refer <https://aquanetsydney.com.au>).

Rosehill Network Pty Ltd holds Network Operator's Licence No: 09_002 and AquaNet Sydney Pty Ltd holds Retail Supplier's Licence number 10_01R. These parties are responsible for the ongoing operation and maintenance of the recycled water distribution network and the supply of retail services (but not the treatment plant) in accordance with the following Licence Plans:

- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002) (Version 1.0), 19 August 2020;
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003) (Version 1.0), 19 August 2020;
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001) (Version 1.0), 19 August 2020;

and other relevant supporting documentation.

It is noted that both Rosehill Network Pty Ltd and AquaNet Sydney Pty Ltd are now subsidiaries of Water Utilities Australia Pty Ltd (WUA). Both entities were previously owned by SGSP (Australia) Assets Pty Ltd (SGSP), trading as Jemena.

It is also noted that the Fairfield Advanced Water Treatment Plant (AWTP),² which also forms part of the Rosehill Recycled Water Scheme, is operated under a separate Network Operator's Licence (No: 09_001) held by Veolia Water Australia Pty Ltd (Veolia).

² Also referred to as the Fairfield Recycled Water Plant.

2.3 Audit Method

2.3.1 Audit Scope

The audit comprised a Licence Plan Audit conducted pursuant to the *WIC Act Audit Guidelines*.³ The specific scope of the audit addressed identified requirements of the *Water Industry Competition (General) Regulation 2008* as they relate to the:

- *Infrastructure Operating Plan (IOP)*;
- *Water Quality Plan (non-potable water) (WQP)* and
- *Retail Supply Management Plan (RSMP)*.

The audit covered all elements of the scheme.

2.3.2 Audit Standard

The audit has been undertaken in accordance with the principles/guidance presented in:

- ISO 19011:2018 *Guidelines for auditing management systems*; and
- IPART, *Audit Guideline; Water Industry Competition Act 2006*, July 2020 (WIC Act Audit Guidelines).

2.3.3 Audit Steps

The audit has been undertaken generally in accordance with the procedure outlined in the *WIC Act Audit Guidelines*. Following approval of an *Audit Proposal* by IPART, an *Audit Agenda* and *Information Request* were sent approximately one week prior to the audit being undertaken. Audit fieldwork comprising interviews with staff, inspection of intranet-based documentation and a virtual site inspection of existing infrastructure was undertaken on 17 December 2020. Some additional items of information and/or clarification were requested following the audit fieldwork and subsequently provided.

A draft audit report was prepared by the Principal Auditor (Dr Daniel Deere) and reviewed by the Quality Assurance Auditor (Mr Jim Sly) and submitted to both the Licensee and IPART for review/comment before being finalised.

The audit process involved seeking objective evidence that the Licensee had complied with the obligations identified for audit by IPART. Evidence was obtained through interview, review of relevant documentation and records, and site inspection.

2.3.4 Audit Team

The audit was conducted by Dr Dan Deere as the Principal Auditor and Mr Jim Sly at the Quality Assurance Auditor, both of whom hold the required Lead Auditor accreditation on IPART's Technical Services and Water Licensing Panel.





The Licensee was represented by Craig Heidenreich, General Manager, Water Utilities Australia (WUA); and Brad Rea, Risk & Compliance Officer and Company Secretary, WUA. Veolia Staff Phil Birkby, Caitlin Copper and Peter Ross greatly assisted with the audit. IPART representatives did not attend as observers during the audit fieldwork.

³ IPART, *Audit Guideline; Water Industry Competition Act 2006*, July 2020.

2.3.5 Audit Grades

Audit grades have been awarded in accordance with guidance presented in the *WIC Act Audit Guidelines*. The compliance grades applicable for the purposes of this audit were as identified in **Table 2.1**.

Table 2.1 Audit Compliance Grades

Compliance Grade	Description
 Compliant	Sufficient evidence is available to confirm that the requirements have been met.
 Non-compliant (non-material)	Sufficient evidence is available to confirm that the requirements have been met and the deficiency does not adversely impact the ability of the Licensee to achieve defined objectives or assure controlled processes, products or outcomes.
 Non-compliant (material)	Sufficient evidence is available to confirm that the requirements have been met and the deficiency does adversely impact the ability of the Licensee to achieve defined objectives or assure controlled processes, products or outcomes.
 No Requirement	There was no requirement for the Licensee to meet this criterion during the audit period.

2.4 Regulatory Regime

The schemes operate in accordance with the provisions of Rosehill Network Pty Ltd’s Network Operator’s Licence No: 09_002 and AquaNet Sydney Pty Ltd’s Retail Supplier’s Licence number 10_01R issued under the *Water Industry Competition Act 2006* (NSW). Other relevant regulatory instruments and standards/guidelines include:

- *Water Industry Competition (General) Regulation 2008* (NSW);
- IPART, *Audit Guideline; Water Industry Competition Act 2006*, July 2020;
- *Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 1) 2006*;
- *Plumbing Code of Australia 2019*;
- *Plumbing and Drainage Act 2011* (NSW); and
- NSW and national water industry and environmental regulations and codes of practice as applicable.

2.5 Quality Assurance Process

The quality of this audit report was assured through a professional review process. The report has been independently reviewed by a Lead Auditor who holds relevant accreditation on IPART’s Technical Services and Water Licensing Panel.

2.6 Audit Findings

Audit findings are summarised in the following **Sections 3 to 5**, and are presented in full detail in **Appendices A to C**.

3. Infrastructure Operating Plan

3.1 Summary of Findings

There were no identified non-compliances in respect of the audited clauses of the *Water Industry Competition (General) Regulation 2008* related to the *Infrastructure Operating Plan*. Detailed assessment in respect of these clauses is presented in **Appendix A**.

Previously, a number of licence plan audits have been undertaken for this scheme and these covered the same scope and infrastructure as the current audit. The major difference with this audit has been that the owner of the infrastructure has shifted to WUA, although the operator, Veolia, hasn't changed. It is noted that those previous licence plan audits were undertaken in 2011⁴, 2014⁵, 2015⁶ and 2018⁷ and ultimately found no non-compliances. WUA prepared its licence plans largely by drawing from those existing licence plans, retaining the relevant information and cross-references, and making reference to WUA in place of the previous owner (SGSP).

3.2 Review of Actions

The Licensee has not made any suggestions for corrections or clarifications following issue of the draft report and prior to the final report being issued.

3.3 Opportunities for Improvement

No opportunities for improvement have been identified in respect of the audited *WIC Regulation* clauses related to the *Infrastructure Operating Plan*.

⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

4. Water Quality Plan (Non-potable Water)

4.1 Summary of Findings

There were no identified non-compliances in respect of the audited clauses of the *Water Industry Competition (General) Regulation 2008* related to the *Water Quality Plan (Non-potable Water)*. Detailed assessment in respect of these clauses is presented in **Appendix B**.

Previously, a number of licence plan audits have been undertaken for this scheme and these covered the same scope and infrastructure as the current audit. The major difference with this audit has been that the owner of the infrastructure has shifted to WUA, although the operator, Veolia, hasn't changed. It is noted that those previous licence plan audits were undertaken in 2011⁸, 2014⁹, 2015¹⁰ and 2018¹¹ and ultimately found no non-compliances. WUA prepared its licence plans largely by drawing from those existing licence plans, retaining the relevant information and cross-references, and making reference to WUA in place of the previous owner (SGSP).

4.2 Review of Actions

The Licensee has not made any suggestions for corrections or clarifications following issue of the draft report and prior to the final report being issued.

4.3 Opportunities for Improvement

The following opportunity for improvement (OFI) has been identified in respect of the audited *WTC Regulation* clauses related to the *Water Quality Plan (Non-potable Water)*:

- **OFI-1:** When updating the licence plan documents, more detailed cross-referencing to subordinate documents could be considered, and inclusion of the network components of the scheme within the scope of the documents could be made explicit.

⁸ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

⁹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

¹⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

¹¹ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network: Licence Plan Audit*, (Version 2.1), October 2018.

5. Retail Supply Management Plan

5.1 Summary of Findings

There were no identified non-compliances in respect of the audited clauses of the *Water Industry Competition (General) Regulation 2008* related to the *Retail Supply Management Plan*. Detailed assessment in respect of these clauses is presented in **Appendix C**.

5.2 Review of Actions

The Licensee has not made any suggestions for corrections or clarifications following issue of the draft report and prior to the final report being issued.


5.3 Opportunities for Improvement

No opportunities for improvement have been identified in respect of the audited *WIC Regulation* clauses related to the *Retail Supply Management Plan*.

Appendix A Detailed Audit Findings – Infrastructure Operating Plan (IOP)

Detailed audit findings in respect of the *Infrastructure Operating Plan* (IOP) are presented in this Appendix.

Table A.1 IOP Audit Table – WIC Reg Sched 1 cl.6(1)(a)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.6(1)(a)	The IOP indicates the arrangements in relation to the design, construction, operation and maintenance of the infrastructure, including particulars as to the life-span of the infrastructure, the system redundancy built into the infrastructure and the arrangements for renewal of the infrastructure.	 Compliant

Risk	Target for Full Compliance
This presents a high operational risk. Knowledge of the capacity and constraints associated with the infrastructure is essential to the effective management of the infrastructure assets in delivering agreed levels of service.	Full development of the Infrastructure Operating Plan, including development of an Asset Management Plan and demonstrated implementation of the infrastructure management practices documented therein.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System* (VAMS) as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment Procedure* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report* (reference: TEM-3942-1), (Revision A), 1 December 2020.

Summary of reasons for grade

The *Infrastructure Operating Plan*, largely through the referenced supporting documentation, appropriately indicates the arrangements adopted in relation to the design, construction, operation, maintenance and renewal (life cycle management) of the infrastructure that is the subject of this audit. Accordingly, the Licensee is considered to have demonstrated full compliance with this obligation.

Discussion and notes

The licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Infrastructure*

Operating Plan and its subordinate documents largely as they were. The *Infrastructure Operating Plan*, as a document, along with the subordinate documents, have been previously assessed under previous licence plan audits undertaken in 2011,¹² 2014,¹³ 2015¹⁴ and 2018¹⁵ and found to be compliant. Therefore, this audit sought to check that the current *Infrastructure Operating Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

Taking the *Infrastructure Operating Plan* as the point of reference, the subordinate documents and systems were queried live during the audit, and infrastructure was inspected. All of the cited documents checked were found to be current and appropriately cited. With respect to the finer levels of detail, the Veolia Assessment Management System (VAMS) is used to manage the assets. VAMS was interrogated during the audit and it was confirmed that the references to VAMS in the *Infrastructure Operating Plan* were reflected in practice. Veolia demonstrated a tiered structure within VAMS that explicitly included the licensed network infrastructure covered under the licence as a single defined asset group. VAMS covered the full range of assets within the tiered structure, with individual items at tier 5 or 6. In general, items above a 100 mm diameter water main have their own asset number, as do parts such as meters that require calibration. Other small parts were grouped. For the identified assets, VAMS shows forward planning of work orders for the network, with work being logically scheduled over time. The field inspections undertaken verified that VAMS had the appropriate asset identification information and correctly represented those assets.

Consistent with previous *Infrastructure Operating Plan* licence plan audits, the *Infrastructure Operating Plan*, largely through the referenced supporting documentation, appropriately indicates the arrangements adopted in relation to the design, construction, operation, maintenance and renewal (life cycle management) of the infrastructure that is the subject of this audit. Accordingly, the Licensee is considered to have demonstrated full compliance with this obligation.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.


¹² Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

¹³ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

¹⁴ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

¹⁵ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

Table A.2 IOP Audit Table – WIC Reg Sched 1 cl.6(1)(b)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.6(1)(b)	The IOP indicates the arrangements in relation to the continued safe and reliable performance of the infrastructure.	 Compliant

Risk

This presents a high operational risk. The risk is generally managed by the implementation of an asset management system/framework that outlines the basis for the ongoing management of the infrastructure assets.

Target for Full Compliance

Preparation of an Asset Management Plan and supporting procedural documentation and demonstrated implementation of appropriate infrastructure management practices.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System (VAMS)* as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment Procedure* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report* (reference: TEM-3942-1), (Revision A), 1 December 2020.

Summary of reasons for grade

The *Infrastructure Operating Plan* indicates the arrangements in relation to the lifecycle management of the infrastructure, the effective implementation of which will ensure the continued safe and reliable performance of the infrastructure. Referenced documents, including particularly the Veolia documents and systems and the associated portfolio of more detailed procedures, support implementation of the arrangements set out in the *Infrastructure Operating Plan*.

Accordingly, it is assessed that the Licensee is compliant with this obligation.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the

details of the *Infrastructure Operating Plan* and its subordinate documents largely as they were. The *Infrastructure Operating Plan*, as a document, along with the subordinate documents, have been previously assessed under previous licence plan audits undertaken in 2011,¹⁶ 2014,¹⁷ 2015¹⁸ and 2018¹⁹ and found to be compliant. Therefore, this audit sought to check that the current *Infrastructure Operating Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

As reported in Table A.1, taking the *Infrastructure Operating Plan* as the point of reference, the subordinate documents and systems were queried live during the audit, and infrastructure was inspected. All of the cited documents checked were found to be current and appropriately cited. The *Infrastructure Operating Plan*, taken together with the *Retail Supply Management Plan* and *Water Quality Plan*, set out arrangements for ensuring continued safe and reliable performance of the infrastructure.

For the identified assets, VAMS shows forward planning of work orders for the network, with work being logically scheduled over time, so as to provide for a preventive management approach. Consistent with previous *Infrastructure Operating Plan* licence plan audits, the *Infrastructure Operating Plan*, largely through the referenced supporting documentation, appropriately indicates the arrangements adopted in relation to ensuring the continued safe and reliable performance of the infrastructure. Accordingly, the Licensee is considered to have demonstrated full compliance with this obligation.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.


¹⁶ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

¹⁷ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

¹⁸ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

¹⁹ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

Table A.3 IOP Audit Table – WIC Reg Sched 1 cl.6(1)(c)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.6(1)(c)	The IOP indicates the arrangements in relation to the continuity of the water supply services.	 Compliant

Risk	Target for Full Compliance
This presents a high operational risk. The risk is generally managed by operating in accordance with agreed protocols for both planned and unplanned service interruptions.	Development and implementation of appropriate protocols for both unplanned and planned service interruptions.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System* (VAMS) as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment Procedure* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report* (reference: TEM-3942-1), (Revision A), 1 December 2020.

Summary of reasons for grade

The Licensee has arrangements in place for ensuring (as far as practicable) the continuity of recycled water supply services; these arrangements are documented in the *Infrastructure Operating Plan* and referenced supporting documentation. The reservoirs that charge the scheme have significant storage capacity and both at the treatment plant and at the reservoir within the network, potable water can be supplied in the event of a loss of recycled water supply. This approach provides sufficient continuity of supply.

Accordingly, it is assessed that the Licensee is compliant with this obligation.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the

details of the *Infrastructure Operating Plan* and its subordinate documents largely as they were. The *Infrastructure Operating Plan*, as a document, along with the subordinate documents, have been previously assessed under previous licence plan audits undertaken in 2011,²⁰ 2014,²¹ 2015²² and 2018²³ and found to be compliant. Therefore, this audit sought to check that the current *Infrastructure Operating Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

As reported in Table A.1, taking the *Infrastructure Operating Plan* as the point of reference, the subordinate documents and systems were queried live during the audit, and infrastructure was inspected. All of the cited documents checked were found to be current and appropriately cited. The *Infrastructure Operating Plan*, taken together with the *Retail Supply Management Plan* and *Water Quality Plan*, set out arrangements for ensuring continuity of supply. The reservoirs that charge the scheme have significant storage capacity to provide supply of water in the event of events such as power failure. In addition, both at the treatment plant and at the reservoir within the network, potable water can be supplied in the event of a loss of recycled water supply. This approach provides sufficient continuity of supply. This level of supply redundancy is consistent with good industry practice. Accordingly, the Licensee is considered to have demonstrated full compliance with this obligation.

In summary, the *Infrastructure Operating Plan*, in conjunction with referenced supporting documentation, adequately outlines the arrangements in relation to ensuring continuity of the recycled water supply services, and those arrangements are compliant.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.


²⁰ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

²¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

²² Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

²³ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

Table A.4 IOP Audit Table – WIC Reg Sched 1 cl.6(1)(d)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.6(1)(d)	The IOP indicates the arrangements in relation to alternative water supplies when the infrastructure is inoperable.	 Compliant

Risk

This presents a high operational risk. The risk is generally managed by operating in accordance with agreed protocols for both planned and unplanned service interruptions.

Target for Full Compliance

Development and implementation of appropriate protocols for both unplanned and planned service interruptions.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System (VAMS)* as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment Procedure* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report* (reference: TEM-3942-1), (Revision A), 1 December 2020.

Summary of reasons for grade

As reported in Table A.3, the Licensee has arrangements in place for ensuring (as far as practicable) the continuity of recycled water supply services; these arrangements are documented in the *Infrastructure Operating Plan* and referenced supporting documentation. The reservoirs that charge the scheme have significant storage capacity, and both at the treatment plant and at the reservoir within the network, potable water can be supplied in the event of a loss of recycled water supply. This approach provides sufficient alternative supply arrangement.

Accordingly, it is assessed that the Licensee is compliant with this obligation.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the

details of the *Infrastructure Operating Plan* and its subordinate documents largely as they were. The *Infrastructure Operating Plan*, as a document, along with the subordinate documents, have been previously assessed under previous licence plan audits undertaken in 2011,²⁴ 2014,²⁵ 2015²⁶ and 2018²⁷ and found to be compliant. Therefore, this audit sought to check that the current *Infrastructure Operating Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

Assessment of the arrangements in relation to alternative recycled water supplies when the infrastructure is inoperable has been largely addressed by the discussion presented in Table A.3. Both at the treatment plant and at the reservoir within the network, potable water can be supplied in the event of a loss of recycled water supply. This approach provides for an alternative supply. This level of supply redundancy is consistent with good industry practice. Accordingly, the Licensee is considered to have demonstrated full compliance with this obligation.

In summary, the *Infrastructure Operating Plan*, in conjunction with referenced supporting documentation, outlines the arrangements in relation to alternative recycled water supplies when the infrastructure is inoperable, and those arrangements are compliant.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.


²⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

²⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

²⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

²⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

Table A.5 IOP Audit Table – WIC Reg Sched 1 cl.6(1)(e)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.6(1)(e)	The IOP indicates the arrangements in relation to the maintenance, monitoring and reporting of standards of service.	 Compliant

Risk

This presents a medium operational risk in that the Licensee may be unaware that standards of service are not being met in the absence of performance monitoring.

Target for Full Compliance

Implementation of appropriate systems to monitor the service delivery performance of the infrastructure.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System (VAMS)* as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment Procedure* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report* (reference: TEM-3942-1), (Revision A), 1 December 2020.
- Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.

Summary of reasons for grade

The *Infrastructure Operating Plan* indicates the arrangements in relation to the maintenance, monitoring and reporting of standards of service, which are also clearly documented. Maintenance of standards is reliant on the implementation of relevant operation and maintenance procedures; monitoring and reporting is principally dependent upon the VAMS and SCADA system and maintenance records.

Accordingly, the Licensee is assessed as being compliant with this obligation.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Infrastructure Operating Plan* and its subordinate documents largely as they were. The

Infrastructure Operating Plan, as a document, along with the subordinate documents, have been previously assessed under previous licence plan audits undertaken in 2011,²⁸ 2014,²⁹ 2015³⁰ and 2018³¹ and found to be compliant. Therefore, this audit sought to check that the current *Infrastructure Operating Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

Section 7 of the *Infrastructure Operating Plan* and the subordinate cited Veolia document³² summarises the levels of service to be provided. Arrangements in relation to the maintenance of service standards (continuity of service) are discussed in Table A.3.

Monitoring (and indeed maintenance) of standards of service are heavily dependent on the SCADA and VAMS systems, the functionality of which (control philosophy) is described in the *Infrastructure Operating Plan* and subordinate documents. Review of functional specifications for the various systems/system components reveals that the appropriate parameters in relation to water quality and water supply flow and volume are monitored.

Operational and verification monitoring in respect of water quality is further addressed in the *Water Quality Plan* which is discussed in Appendix B.

In summary, the *Infrastructure Operating Plan*, in conjunction with referenced supporting documentation, outlines the arrangements in relation to the maintenance, monitoring and reporting of standards of service, and is compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

²⁸ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

²⁹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

³⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.


³¹ Cobbitty Consulting/Water Futures, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), October 2018.

³² Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.

Appendix B Detailed Audit Findings – Water Quality Plan (Non-potable Water) (WQP (npw))

Detailed audit findings in respect of the *Water Quality Plan (Non-potable Water)* (WQP (npw)) are presented in this Appendix.

Table B.1 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 1

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 1. The WQP (npw) shows a commitment to responsible use and management of recycled water quality.	 Compliant

Risk

The lack of a water quality policy, up to date and accurate details for regulatory and formal requirements and contact details for stakeholders presents a small operational risk for this scheme.

Target for Full Compliance

A water quality policy, an up to date list of regulatory and formal requirements and an up to date list of stakeholders and their contact details.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.
- Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).
- WUA, *Quality, Health, Safety and Environment Policy*, (reference: WUA-IMS-DOC-001), (Version 1.2), 6 February 2020.
- Veolia, *Water Quality Policy* (reference: POL-2), 10 July 2020.

Summary of reasons for grade

The Licensee demonstrated that its generic *Quality, Health, Safety and Environment Policy*, combined with the Veolia *Water Quality Policy*, were up-to-date and made commitments to meeting regulatory and formal requirements and working with stakeholders. In addition, between the *Water Quality Plan* and subordinate documents, the information on stakeholders and regulatory and formal requirements was sufficient and current.

Consequently, the Licensee was considered compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,³³ 2014,³⁴ 2015³⁵ and 2018³⁶ and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that its generic quality policy, combined with the Veolia *Water Quality Policy*, were up-to-date, made commitments to meeting regulatory and formal requirements and working with stakeholders. The generic *Quality, Health, Safety and Environment Policy* held by WUA didn't explicitly single out recycled water but covered it implicitly with its scope and so reliance was placed on the Veolia *Water Quality Policy* to provide the more explicit details.

The WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP³⁷ and the Veolia *Incident and Emergency Management Manual*,³⁸ collectively provide details on stakeholders and on regulatory and formal requirements. These had been reasonably recently updated. The Veolia documents are focused on the treatment plant but most of the Element 1 contents are the same for the network and treatment plant, e.g. the relevant health agency and regulator and notification requirements.

In conclusion, the Licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

³³ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

³⁴ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.


³⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

³⁶ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

³⁷ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

³⁸ Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).

Table B.2 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 2

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 2. The WQP (npw) includes an analysis of the recycled water system.	 Compliant

Risk

Failure to adequately describe the system and assess risks could lead to risks being overlooked.

Target for Full Compliance

Adequate system description and risk assessment.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System* (VAMS) as viewed online on 17 December 2020.
- Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.
- Veolia, *Customer Exposure Assessment and Health Performance Targets* (reference: EXT-3877-1), 4 September 2017.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.

Summary of reasons for grade

The Licensee demonstrated that the *Water Quality Plan* in conjunction with other relevant documentation provides an appropriate assessment of the water supply system. The system arrangement is documented, the intended uses are clear, the receiving environment understood, and risk assessments have been undertaken by appropriately experienced teams in accordance with the guidance presented in the *Australian Guidelines for Water Recycling*.

Accordingly, the Licensee is assessed to be compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,³⁹ 2014,⁴⁰ 2015⁴¹ and 2018⁴² and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the infrastructure, uses of recycled water, and risks, hadn't changed in any significant manner since the most recent previously audited documentation describing the system and its associated risks were completed. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁴³ the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

³⁹ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁴⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁴¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁴² Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁴³ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.3 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 3

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 3. The WQP (npw) outlines the preventive measures for water quality management.	 Compliant

Risk	Target for Full Compliance
Failure to adequately define preventive measures and assess residual risks could lead to risks being overlooked.	Adequate definition of preventive measures and residual risk assessment.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System (VAMS)* as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).
- Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.
- Veolia, *Customer Exposure Assessment and Health Performance Targets* (reference: EXT-3877-1), 4 September 2017.
- Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Summary of reasons for grade

The Licensee has provided details in relation to the risk management measures (controls) in respect of recycled water quality. Inspection of the infrastructure found that those controls had been correctly described and captured within the SCADA and VAMS systems.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁴⁴ 2014,⁴⁵ 2015⁴⁶ and 2018⁴⁷ and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the infrastructure, including the risks and preventive measures, hadn't changed in any significant manner since the previously audited documentation describing the risks and their associated controls were completed. Preventive measures still included disinfectant residual maintenance and reporting; backflow prevention centred around reduced pressure zone devices (subject to annual testing under VAMS work orders) and air gaps; purple piping and/or labelling and signage; and forming customer agreements (with Sydney Water for foundation customers and WUA for newer customers).

Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁴⁸ the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁴⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁴⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁴⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁴⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁴⁸ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.4 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 4

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 4. The WQP (npw) outlines the operational procedures and process control for the scheme.	 Compliant
Risk	Failure to adequately formalise procedures could lead to inconsistent operation and exposes customers to risk of poor quality water being supplied.	Target for Full Compliance
		Adequate detail on operational procedures to protect water quality.
Evidence sighted		
<ul style="list-style-type: none"> ▪ Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020. ▪ Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack). ▪ Site inspection of the SCADA system on 17 December 2020. ▪ Rosehill Network Pty Ltd, <i>Infrastructure Operating Plan</i> (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020. ▪ Rosehill Network Pty Ltd, <i>Water Quality Management Plan</i> (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020. ▪ AquaNet Sydney Pty Ltd, <i>Retail Supply Management Plan</i> (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020. ▪ <i>Veolia Asset Management System (VAMS)</i> as viewed online on 17 December 2020. ▪ Veolia, <i>Rosehill Recycled Water Scheme Overview</i> (reference PRO-3820-3), 19 February 2020. ▪ Veolia, <i>Definition of Interface Points</i>, 27 February 2019. ▪ Veolia, <i>Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report</i> (reference: TEM 3942-1), (Revision A), 1 December 2020. ▪ Veolia, <i>Incident and Emergency Management Manual</i> (reference: MAN-3935-4), undated (living document). ▪ Veolia, <i>Recycled Water Specification</i> (reference: TEM-3898-1), 8 November 2020. ▪ Veolia, <i>Customer Exposure Assessment and Health Performance Targets</i> (reference: EXT-3877-1), 4 September 2017. ▪ Veolia, <i>Fairfield Advanced Water Treatment Plant Water Quality Management Plan</i>, 24 April 2020. 		
Summary of reasons for grade		
<p>The Licensee has outlined its arrangements in relation to operational procedures, operational monitoring and corrective actions in the <i>Water Quality Plan</i>, with additional detail presented in Veolia’s documentation and procedures, which include detailed arrangements for ensuring that equipment capability is maintained.</p>		

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁴⁹ 2014,⁵⁰ 2015⁵¹ and 2018⁵² and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the infrastructure, including the operational procedures, operational monitoring and corrective actions, hadn't changed in any significant manner since the most recent audit of the documentation describing them was completed. The controls were witnessed in the SCADA system and for the inspected infrastructure with the licence plans accurately describing relevant aspects of that infrastructure. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁵³ the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁴⁹ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁵⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁵¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁵² Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁵³ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.5 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 5

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 5. The WQP (npw) outlines the process for verification of the water quality.	 Compliant

Risk	Target for Full Compliance
Inadequate verification presents a risk of ongoing supply of unfit recycled water over the longer term.	A suitable verification program is required to ensure that ongoing monitoring and assurance takes place.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).
- Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.
- Veolia, *Customer Exposure Assessment and Health Performance Targets* (reference: EXT-3877-1), 4 September 2017.
- Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.
- Veolia, *Laboratory Analysis Schedule* (reference: TEM-3799-4), living worksheet.
- Veolia, *Network-Sampling & Analysis* (reference: TEM-12762-1; 2; 3), living worksheets covering RRWN Fairfield, Visy and Rosehill Sampling & Analysis.
- Veolia, *Handling Complaints Procedure* (reference: PRO-3916-2), 6 July 2020.

Summary of reasons for grade

The Licensee has appropriately detailed its recycled water quality verification processes. These processes involve the monitoring of water quality data and customer complaints; appropriate corrective actions have also been identified.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁵⁴ 2014,⁵⁵ 2015⁵⁶ and 2018⁵⁷ and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the verification program, including relating to laboratory testing and handling responses to customer feedback, hadn't changed in any significant manner since the most recent audit of the documentation describing them was completed. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁵⁸ the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁵⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁵⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁵⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁵⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁵⁸ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.6 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 6

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 6. The WQP (npw) includes details on the management of incidents and emergencies.	 Compliant

Risk

The absence of an approach for handling incidents and emergencies presents a risk of poor response to incidents arising related to the recycled water supply scheme.

Target for Full Compliance

An adequate management plan for incidents and emergencies.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System* (VAMS) as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.
- Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).
- Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.
- Veolia, *Customer Exposure Assessment and Health Performance Targets* (reference: EXT-3877-1), 4 September 2017.
- Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.
- Veolia, *Laboratory Analysis Schedule* (reference: TEM-3799-4), living worksheet.
- Veolia, *Network-Sampling & Analysis* (reference: TEM-12762-1; 2; 3), living worksheets covering RRWN Fairfield, Visy and Rosehill Sampling & Analysis.
- Veolia, *Handling Complaints Procedure* (reference: PRO-3916-2), 6 July 2020.

Summary of reasons for grade

The Licensee has developed an approach to the management of incidents and emergencies that centres on Veolia’s ‘living’ *Incident and Emergency Management Manual*, which includes NSW Health, the EPA and IPART, as parties to be notified as required.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁵⁹ 2014,⁶⁰ 2015⁶¹ and 2018⁶² and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the incident and emergency response systems hadn’t changed in any significant manner since the most recent audit of the documentation describing them was completed. One change is that the Licensee’s contact telephone number has been updated (to 02 9278 0700) on the signage at the inspected sites and in the relevant documentation. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP⁶³, the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁵⁹ Water Futures/t-cAM Consulting, *Network Operator’s Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁶⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator’s Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁶¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator’s Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁶² Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁶³ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.7 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 7

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 7. The WQP (npw) outlines operator, contractor and end user awareness and training requirements.	 Compliant

Risk

Inadequate training and awareness of employees presents a risk of poor management of the recycled water supply scheme.

Target for Full Compliance

Adequate training and awareness of employees.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).
- Veolia, *Learning and Development Policy* (reference: POL-7-3) 1 August 2020.

Summary of reasons for grade

The *Water Quality Plan* outlines the arrangements in relation to employee and end user training and awareness in sufficient detail. Observations made during the audit indicate that key staff members have appropriate skills and experience to undertake the operation and maintenance of the recycled water infrastructure in a safe and effective manner.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁶⁴ 2014,⁶⁵ 2015⁶⁶ and 2018⁶⁷ and found to be compliant.

⁶⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

⁶⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁶⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁶⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the training, competency and awareness processes hadn't changed in any significant manner since the most recent audit of the documentation describing them was completed. One change is that the point of contact for the scheme is WUA which entails new branding and a new phone number. Signage at the sites visited had been updated, along with the scheme internet site (<https://aquanetsydney.com.au>). Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁶⁸ and associated minor updates to branding and contact details, the new licensee was found to be compliant with this requirement.

Recommendations


There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁶⁸ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.8 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 8

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 8. The WQP (npw) outlines the process for community awareness and involvement.	 Compliant

Risk	Target for Full Compliance
Inadequate community consultation, awareness and involvement present a risk of poor management of the recycled water supply scheme.	Adequate community consultation, awareness and involvement.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Incident and Emergency Management Manual* (reference: MAN-3935-4), undated (living document).
- Veolia, *Learning and Development Policy* (reference: POL-7-3) 1 August 2020.

Summary of reasons for grade

The Licensee has provided sufficient detail in relation to its process for community consultation, awareness and involvement. The mechanisms employed are primarily website based, but also include direct contact with Veolia field operations staff.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁶⁹ 2014,⁷⁰ 2015⁷¹ and 2018⁷² and found to be compliant.

⁶⁹ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

⁷⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁷¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁷² Cobbitty Consulting/Water Futures, *SGSP Rosehill Network: Licence Plan Audit*, (Version 2.1), October 2018.

Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the community consultation, awareness and involvement processes hadn't changed in any significant manner since the most recent audit of the documentation describing them was completed. One change is that the point of contact for the scheme is WUA which entails new branding a new phone number. Signage at the sites visited had been updated, along with the scheme internet site (<https://aquanetsydney.com.au>). Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁷³ and associated minor updates to branding and the website, the new licensee was found to be compliant with these requirements.

Recommendations


There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁷³ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.9 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 9

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 9. The WQP (npw) outlines the validation, research and development processes for the scheme.	 Compliant

Risk	Target for Full Compliance
Inadequate validation, research and development processes present a risk of poor management of the recycled water supply scheme.	Adequate validation, research and development processes.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Recycled Water Specification* (reference: TEM-3898-1), 8 November 2020.
- Veolia, *Customer Exposure Assessment and Health Performance Targets* (reference: EXT-3877-1), 4 September 2017.
- Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Summary of reasons for grade

The Licensee has outlined its approach in relation to the validation of processes. The processes used to control hazards have been adequately validated. Design of infrastructure was undertaken by appropriately qualified personnel in accordance with industry standards to provide the basis for continuing reliability.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under

previous licence plan audits undertaken in 2011,⁷⁴ 2014,⁷⁵ 2015⁷⁶ and 2018⁷⁷ and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the nature of the infrastructure, its risks and the preventive measures and the validation for the efficacy of the scheme, hadn't changed in any significant manner since the previously audited documentation describing validation, research and development was completed. Technically valid preventive measures that are considered sufficient to control the risk still included disinfectant residual maintenance and reporting; backflow prevention centred around reduced pressure zone devices and air gaps; purple piping and/or labelling and signage; and forming customer agreements (with Sydney Water for foundation customers and WUA for newer customers).

Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP⁷⁸, the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁷⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁷⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁷⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁷⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁷⁸ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.10 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 10

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 10. The WQP (npw) outlines the process for management of documentation and records as well as the reporting requirements.	 Compliant
Risk Inadequate documentation, records and reporting presents a risk of poor management of the recycled water supply scheme.		Target for Full Compliance Adequate documentation, records and reporting.
Evidence sighted		
<ul style="list-style-type: none"> ▪ Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020. ▪ Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack). ▪ Site inspection of the SCADA system on 17 December 2020. ▪ Rosehill Network Pty Ltd, <i>Infrastructure Operating Plan</i> (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020. ▪ Rosehill Network Pty Ltd, <i>Water Quality Management Plan</i> (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020. ▪ AquaNet Sydney Pty Ltd, <i>Retail Supply Management Plan</i> (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020. ▪ <i>Veolia Asset Management System (VAMS)</i> as viewed online on 17 December 2020. ▪ Veolia, <i>Fairfield Advanced Water Treatment Plant Water Quality Management Plan</i>, 24 April 2020. 		
Summary of reasons for grade		
<p>The Licensee has outlined its arrangements in relation to the management of documentation and records, and complying with its reporting requirements. Appropriate systems are either already in place or currently being implemented.</p> <p>Accordingly, it is assessed that the Licensee is compliant with this requirement.</p>		
Discussion and notes		
<p>As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the <i>Water Quality Plan</i> and its subordinate documents largely as they were. The <i>Water Quality Plan</i>, as a document, along with the subordinate documents, has been previously assessed under</p>		

previous licence plan audits undertaken in 2011,⁷⁹ 2014,⁸⁰ 2015⁸¹ and 2018⁸² and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the previously audited documentation was largely unchanged since it was previously audited, and that the body of documentation was sufficient to demonstrate compliance. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁸³ the new licensee was found to be compliant with this requirement.

In some cases, some of the relevant Veolia documents weren't explicitly referenced in the WUA *Water Quality Plan*. In other cases, some of the referenced Veolia documents didn't explicitly identify that they covered the whole scheme, including the network, and not just the treatment plant, (although in practice the documents were being interpreted as covering the scheme as a whole). Therefore, as an opportunity for improvement (OFI-1), when updating the licence plan documents, more detailed cross-referencing to subordinate documents could be considered, and inclusion of the network components of the scheme within the scope of the documents could be made explicit.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

The following OFI is made in respect of these requirements:

- OFI-1: When updating the licence plan documents, more detailed cross-referencing to subordinate documents could be considered, and inclusion of the network components of the scheme within the scope of the documents could be made explicit.
-

⁷⁹ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.


⁸⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁸¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁸² Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

⁸³ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.11 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 11

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 11. The WQP (npw) outlines the process for long-term evaluation of results and the audit of the documentation.	 Compliant

Risk

Inadequate long-term evaluation and audit presents a risk of poor management of the recycled water supply scheme.

Target for Full Compliance

Adequate long-term evaluation and audit.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Summary of reasons for grade

The Licensee has outlined the arrangements in relation to its long-term evaluation of results and audit of the implementation of the *Water Quality Plan*. Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁸⁴ 2014,⁸⁵ 2015⁸⁶ and 2018⁸⁷ and found to be compliant. Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

⁸⁴ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

⁸⁵ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁸⁶ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁸⁷ Cobbitty Consulting/Water Futures, *SGSP Rosehill Network: Licence Plan Audit*, (Version 2.1), October 2018.

The Licensee demonstrated that the previously audited documentation was largely unchanged since it was previously audited, and that the body of documentation was sufficient to demonstrate compliance. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁸⁸ the new licensee was found to be compliant with this requirement.

Recommendations


There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

⁸⁸ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Table B.12 WQP (npw) Audit Table – WIC Reg Sched 1 cl.7(1)(b) – AGWR Element 12

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl.7(1)(b)	Element 12. The WQP (npw) outlines a process for review and continual improvement.	 Compliant

Risk	Target for Full Compliance
An inadequate process for review and continual improvement a risk of poor management of the recycled water supply scheme.	Adequate processes for review and continual improvement.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- Veolia *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Summary of reasons for grade

The Licensee outlined the arrangements in relation to management review and continual improvement of the *Water Quality Plan*.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Water Quality Plan* and its subordinate documents largely as they were. The *Water Quality Plan*, as a document, along with the subordinate documents, has been previously assessed under previous licence plan audits undertaken in 2011,⁸⁹ 2014,⁹⁰ 2015⁹¹ and 2018⁹² and found to be compliant.

⁸⁹ Water Futures/t-cAM Consulting, *Network Operator's Licence Audit Report (initial (pre-commercial operation) stage audit) Licence No. 09_002: Rosehill-Camellia Recycled Water Distribution Network, NSW (part of the Rosehill-Camellia Recycled Water Scheme) SPI Rosehill Network Pty Limited (ACN 131 213 691)*, (Final Report), 1 August 2011.

⁹⁰ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 23 June 2014.

⁹¹ Water Futures/Cobbitty Consulting, *Report on the Follow-up Licence Plan Audit of Network Operator's Licence No. 09_002 (SGSP Rosehill Network) under WICA*, (Final Report), 16 June 2015.

⁹² Cobbitty Consulting/Water Futures, *SGSP Rosehill Network; Licence Plan Audit*, (Version 2.1), October 2018.

Therefore, this audit sought to check that the current *Water Quality Plan* and subordinate documents were current and accurate and that no non-compliances had arisen during transition.

The Licensee demonstrated that the previously audited documentation was largely unchanged since it was previously audited, and that the body of documentation was sufficient to demonstrate compliance. Therefore, given that the previous licensee had demonstrated compliance, based on the WUA *Water Quality Plan*, combined with the Veolia equivalent document for the Fairfield AWTP,⁹³ the new licensee was found to be compliant with this requirement.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement


No opportunities for improvement have been identified in respect of this obligation.

⁹³ Veolia, *Fairfield Advanced Water Treatment Plant Water Quality Management Plan*, 24 April 2020.

Appendix C Detailed Audit Findings – Retail Supply Management Plan (RSMP)

Detailed audit findings in respect of the *Retail Supply Management Plan* (RSMP) are presented in this Appendix.

Table C.1 RSMP Audit Table – WIC Reg Sched 2 cl. 7A(l)(a-c)

Clause	Requirement	Compliance Grade
WIC Reg Sched 2 cl. 7A(l)(a-c)	<p>The Retail Supply Management Plan indicates the events and circumstances that could adversely affect the Licensee's ability to supply water.</p> <p>The Retail Supply Management Plan indicates the arrangements in relation to the probability of the occurrence of any such event or circumstance that could adversely affect the Licensee's ability to supply water.</p> <p>The Retail Supply Management Plan indicates the arrangements in relation to the measures to be taken by the Licensee to prevent the occurrence, or minimise the effect, or any such event or circumstance that could adversely affect the Licensee's ability to supply water.</p> <p>The Retail Supply Management Plan indicates the arrangements in relation to the measures to be taken by the Licensee to arrange alternative supplies of water in response to any such event or circumstance that could adversely affect the Licensee's ability to supply water.</p>	 Compliant

Risk	Target for Full Compliance
This presents a high operational risk. The risk is generally managed by operating in accordance with agreed protocols for both planned and unplanned service interruptions.	Development and implementation of appropriate protocols for both unplanned and planned service interruptions.

Evidence sighted

- Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020.
- Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack).
- Site inspection of the SCADA system on 17 December 2020.
- Rosehill Network Pty Ltd, *Infrastructure Operating Plan* (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020.
- Rosehill Network Pty Ltd, *Water Quality Management Plan* (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020.
- AquaNet Sydney Pty Ltd, *Retail Supply Management Plan* (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020.
- *Veolia Asset Management System (VAMS)* as viewed online on 17 December 2020.
- Veolia, *Rosehill Recycled Water Scheme Overview* (reference PRO-3820-3), 19 February 2020.
- Veolia, *Asset Condition and Risk Assessment Procedure* (reference: PRO-3822-2), 28 August 2019.
- Veolia, *Definition of Interface Points*, 27 February 2019.

-
- Veolia, *Fairfield RWP and Rosehill Network Recycled Water Plan Asset Summary Report* (reference: TEM-3942-1), (Revision A), 1 December 2020.
-

Summary of reasons for grade

The *Retail Supply Management Plan*, considered as a package along with its referenced *Water Quality Plan*, *Infrastructure Operating Plan* and supporting documents and risk assessments, indicate the events and circumstances that could adversely affect the Licensee's ability to supply water, their probability of occurrence, measures to prevent their occurrence or minimise their effect, and measures to provide alternative supply arrangements if necessary.

Accordingly, it is assessed that the Licensee is compliant with this requirement.

Discussion and notes

As reported in Table A.1, the licensed infrastructure is managed on behalf of WUA by Veolia. WUA has essentially taken on board and adopted the obligations of the previous scheme owner but left the details of the *Retail Supply Management Plan* and its subordinate documents largely as they were.

The *Retail Supply Management Plan*, taken together with the *Infrastructure Operating Plan* and *Water Quality Plan*, considered the circumstances, and probability of their occurrence, that could adversely affect the Licensee's ability to supply water, measures to prevent the occurrence, or minimise the effect, and ability to arrange alternative supplies if required.

For the identified assets, VAMS shows forward planning of work orders for the network, with work being logically scheduled over time, so as to provide for a preventive management approach. Consistent with previous licence plan audits, those plans and referenced supporting documentation appropriately indicate the arrangements adopted in relation to ensuring the continued safe and reliable performance of the infrastructure and providing alternative supply sources. If required, Sydney Water has step-in rights to take over the operation of the scheme. Accordingly, the Licensee is considered to have demonstrated full compliance with this obligation.


Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.

Table C.2 RSMP Audit Table – WIC Reg Sched 2d. 7A(1)(d)(i-ii)

Clause	Requirement	Compliance Grade
WIC Reg Sched 2d. 7A(1)(d)(i-ii)	<p>The Retail Supply Management Plan indicates the arrangements that the Licensee has made to ensure that it complies with its code of practice for customer complaints and its code of practice for debt recovery, of small retail customers.</p> <p>The Retail Supply Management Plan indicates the arrangements that the Licensee has made in relation to ensuring it complies with the marketing code of conduct and transfer code of conduct.</p>	 Compliant
Risk	Target for Full Compliance	
<p>This presents a high operational risk. The viability of the scheme can be adversely impacted by failure to recover revenue from, or by losing support of, the customers.</p>	<p>Development and implementation of appropriate protocols to recover revenue and maintain customer support in accordance with the relevance codes.</p>	
Evidence sighted		
<ul style="list-style-type: none"> ▪ Interviews with Water Utilities Australia and Veolia personnel on 17 December 2020. ▪ Site inspections of infrastructure on 17 December 2020 (Woodville Reservoir, Woodville Golf Course interface point, Woodville Remote Terminal Unit, Rosehill Reservoir, Rosehill Pump Station, Rosehill Wet Rack). ▪ Site inspection of the SCADA system on 17 December 2020. ▪ Rosehill Network Pty Ltd, <i>Infrastructure Operating Plan</i> (reference: RRWS-IMS-DOC-002), (Version 1.0), 19 August 2020. ▪ Rosehill Network Pty Ltd, <i>Water Quality Management Plan</i> (reference: RRWS-IMS-DOC-003), (Version 1.0), 19 August 2020. ▪ AquaNet Sydney Pty Ltd, <i>Retail Supply Management Plan</i> (reference: RRWS-IMS-DOC-001), (Version 1.0), 19 August 2020. ▪ Veolia, <i>Rosehill Recycled Water Scheme Overview</i> (reference PRO-3820-3), 19 February 2020. ▪ Veolia, <i>Definition of Interface Points</i>, 27 February 2019. ▪ Veolia, <i>Incident and Emergency Management Manual</i> (reference: MAN-3935-4), undated (living document). ▪ Veolia, <i>Recycled Water Specification</i> (reference: TEM-3898-1), 8 November 2020. ▪ Veolia, <i>Customer Exposure Assessment and Health Performance Targets</i> (reference: EXT-3877-1), 4 September 2017. ▪ Veolia, <i>Fairfield Advanced Water Treatment Plant Water Quality Management Plan</i>, 24 April 2020. ▪ Veolia, <i>Handling Complaints Procedure</i> (reference: PRO-3916-2), 6 July 2020. 		

Summary of reasons for grade

The *Retail Supply Management Plan* had correctly referenced the relevant arrangements that the Licensee had made to ensure that it complies with its codes of practice for customer complaints and debt recovery as well as the marketing and transfer codes of conduct.

Accordingly, the Licensee was Compliant in respect of these obligations.

Discussion and notes

The *Retail Supply Management Plan* correctly referenced the relevant arrangements that the Licensee had made to ensure that it complies with its codes of practice for customer complaints and debt recovery as well as the marketing and transfer codes of conduct. Accordingly, the Licensee was compliant in respect of this obligation.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement have been identified in respect of this obligation.



Cobbitty Consulting
Engineering and Advisory Services