

RIA Performance Audit (Licence) - Post Audit Implementation Plan – ERA Water Services 2020 – V2

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
2019 Audit					
1/2019	<p>Rating –Various</p> <ul style="list-style-type: none"> o Paxon examined the RIA documents entitled: <ul style="list-style-type: none"> • “Regulatory Commitments”; • “Utilities Licence and Compliance Register”; and • “Rottnest IS – Water Customer Services”. <p>Hereinafter collectively referred to as the “RIA Control Documents”;</p> <ul style="list-style-type: none"> o Paxon found the RIA’s “Regulatory Commitments” document only refers to a small number of compliance obligations in terms of the water services legislative instruments; o Paxon found the RIA’s “Utilities Licence and Compliance Register” document also only refers to a small number of compliance obligations in terms of the water services legislative instruments; o Paxon found the RIA’s “Rottnest IS – Water Customer Services” document (Customer Manual) addresses compliance obligations from the perspective of customers and not in 	<p>The RIA should consider implementing a compliance register which records all its obligations in terms of the Water Legislation. This register should identify, per individual compliance obligation, appropriate policy and procedure documents and responsible employees. The ERA’s document entitled: “Water Compliance Reporting Manual - Water Services Act 2012 – May 2018” may help the RIA to develop its own compliance register.</p>	<p>The RIA will implement a Compliance Management System which records all its obligations in terms of the Water Legislation. The CMS will include a licence register, obligations register and policy and procedures relating.</p> <p>The RIA will update the Rottnest IS – Water Customer Services” document (Customer Manual)</p>	<p>Director Environment Heritage and Parks</p> <p>Environment Sustainability and Compliance Manger</p> <p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	<p>Oct 2020</p> <p>30 June 2020</p>

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	<p>general terms. Paxon further notes the Customer Manual was last updated on 31 May 2016. Thus, this document was not updated to take account of the stipulations of the:</p> <ul style="list-style-type: none"> • Water Services Code of Conduct (Customer Service Standards) 2018; and • ERA: Water services licence – Rottnest Island Authority – WL10, version 8, 1 July 2016. <p>○ Paxon could not find any direct reference to the stipulations of section 23 of the Act in the RIAs Control Documents.</p>				
2/2019	<p>Rating – A3</p> <p>○ Paxon confirmed by interview of the RIA Representative that, during the Audit Period, the RIA did make changes to its asset management system which included:</p> <ul style="list-style-type: none"> • Upgrade of the WWTP; and • Automated chlorination for tanks 4 and 5. <p>○ Paxon examined the results of a TRIM search of records conducted for "ERA". The search results found no records regarding the RIA giving details of these changes to its asset management system to the ERA</p>	<p>The RIA must give details of any changes to its asset management system to the ERA.</p>	<p>The RIA will provide details of the Enterprise Asset Management System and any changes to the ERA. For logistical efficiency, RIA will report, if applicable, in February and August of each year identifying any changes to the Enterprise Asset Management System in the previous 6 months period.</p>	<p>Director Infrastructure</p> <p>Project Manager - Enterprise Asset Management System</p>	<p>31 August 2020</p>

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3/2019 (01/2017)	<p>Rating – A3</p> <ul style="list-style-type: none"> o Paxon confirmed by interview of the RIA Representative that, during the Audit Period, the RIA did not take took reasonable steps to minimise the extent or duration of planned interruptions of water services it was responsible for (as reported in the RIA's 2016/2017 and 2017/2018 compliance reports); o Paxon examined the RIA's compliance report for 2016/2017 which states: <i>"In the 2016/17 reporting period there were 4 breakages to the main water reticulation system."</i>; and o Paxon examined the RIA's compliance report for 2017/2018 which states: <i>"In the 2017/18 compliance period there were 6 breakages to the main water reticulation system. ...There is still a risk of unplanned interruptions due to ageing infrastructure.</i> <i>Stage 2 (analysis and rationalisation of scanning data) will continue into 2018/2019, pending finalisation of recruitment process. 1st December 2018 depending on progress."</i> 	The RIA must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for, so as to comply with the stipulations of section 77(3) of the Act.	<p>RIA will complete Phase 2 - mapping the below ground assets, including updating the Asset Register with the asset details, location and condition.</p> <p>RIA will complete Phase 3 - updating RIA's own Asset Register (part of RIA's own Enterprise Asset Management System) with the asset details, location and condition</p> <p>RIA will ensure compliance with section 77(3) of the Act, noting that this does not capture mains breakages.</p>	<p>Director Infrastructure</p> <p>Project Manager - Enterprise Asset Management System</p>	<p>30 September 2020</p> <p>31 December 2020</p>

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			<ul style="list-style-type: none"> • Provide clearly visible signage "Fire Hydrant Pumping Station" at the water pump station (Digby Drive) to make it readily identifiable by crews. • Install a site plan in the water pump station (Digby Drive) showing fire hydrant locations with each hydrant numbered accordingly. • Provide a backup diesel generator at the water pump station (Digby Drive), should the island succumb to a total power failure all four pumps will be out of action. • Install a an AS2419.1-2005-compliant reticulated feed hydrant system to provide coverage and protection to the existing buildings in the town centre including to the north and south of the Visitor Centre which would have previously been reliant on the existing non-compliant gravity fed system. 	<p>Parks Services Manager</p> <p>Parks Services Manager</p> <p>Parks Services Manager</p> <p>Parks Services Manager</p>	<p>Complete</p> <p>30/6/2020</p> <p>Complete</p> <p>30/6/2021</p> <p>South of the Visitor Centre completed. North of the Visitor Centre in progress. Stage 3 is going into</p>

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			<ul style="list-style-type: none"> Extend the new fire hydrant service on Kingstown Road into the Kingstown Barracks area. 	Director Infrastructure	design phase. In progress Stage 4 is going into design phase – installation by 30/09/2021
			<ul style="list-style-type: none"> Once an AS2419.1-2005-compliant hydrant system has been installed, all hydrants which are dependent on the gravity fed system are to be removed. 	Parks Services Manager	Ongoing
			<ul style="list-style-type: none"> All future proposed structures should have compliant hydrant coverage. All new developments on the Island will have provision for AS2419.1-2005-compliant firefighting hydrants or 	Director Contracts and Planning	Ongoing

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			other. This will be managed through tender documentation for example Hotel Rottnest Resort, Lodge Redevelopment. Existing developments such as West End will have tanks to supply water.	Leasing and Development Manager	Ongoing
5/2019	<p>Rating- D 1</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's Customer Manual which states in section 4.1 under the heading: <i>"Planned interruption to water supply"</i>: ○ <i>"The Rottnest Island Authority aims to provide the customer with notice 24 hours in advance if the water supply needs to be interrupted for planned work."</i> 	The RIA should update its "Water Customer Services" manual to include appropriate content regarding giving 48 hours' notice of proposed entry so as to comply with the stipulations of section 129(5) of the Act.	The RIA will update the Water Customer Services" manual to include appropriate content regarding giving 48 hours' notice of proposed entry to ensure compliance.	Director Contracts and Planning Leasing and Development Manager	30 June 2020

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6/2019	<p>Rating- D NR</p> <ul style="list-style-type: none"> o Paxon examined the RIA's <i>"Development Planning Policy"</i>. Paxon notes this policy includes a section seven entitled: <i>"Statutory Compliance and Relevant Documentation"</i>. This section lists applicable legislation other than the water services legislative instruments. Paxon notes section 5 of the policy entitled: <i>"Policy Position"</i> states: <i>"For designated developments, a period for stakeholder and public comment must be incorporated into the Development Approval Process."</i> <p>This policy statement interfaces with section 144 of the Act. However, this statement alone does not represent sufficient controls to ensure compliance with RIA compliance obligations included in sections 143, 144, 145 and 147 of the Act; and</p> <ul style="list-style-type: none"> o Paxon examined the RIA's <i>"Development Approval Process"</i>. Paxon found this process document interfaces with sections 143 and 144 of the Act but does not explicitly refer to RIA compliance obligations included in sections 143, 144, 145 and 147 of the Act. 	<p>The RIA should include appropriate references to its obligations in terms of major works, as stipulated in sections 143, 144 and 145 of the Act in its policy and procedure documents.</p>	<p>The RIA will update the Development Planning Policy and Development Approval Process to include all obligations in section 143,144 and 145 of the Act, including -</p> <p>143. Licensee to prepare plans and publish and give notice of major works</p> <p>144. Objections and submissions</p> <p>145. Licensee may amend proposal</p>	<p>Director Contracts and Planning</p> <p>Development Planning Coordinator</p>	<p>31 March 2020</p>

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7/2019	<p>Rating- D3</p> <ul style="list-style-type: none"> ○ Paxon confirmed by interview of the RIA's Environment, Health and Compliance Coordinator that, during the Audit Period: <ul style="list-style-type: none"> • All property on Rottneest Island not occupied by the RIA was subject to commercial lease agreements; • Entry to such places was covered under commercial lease agreements; and • The RIA regarded the stipulations of sections 173(4), 174(1), 174(3), 175(2), 175(5), 176(1), 176(3), 176(4) and 181 of the Act as not applicable to its operations (meaning such stipulations were not complied with in instances, if any, where applicable). ○ Paxon examined the RIA's: "Water Customer Services" manual (Manual). This Manual refers to the stipulations of sections 173(4) and 174(3) of the Act in sections 4.1 and 4.4 of the Manual. However, Paxon found the references to section 173(4) of the Act are not in agreement with the stipulations of the Act. 	<ul style="list-style-type: none"> • Paxon believes the stipulations of sections 173(4), 174(1), 174(3), 175(2), 175(5), 176(1), 176(3), 176(4) and 181 of the Act: <ul style="list-style-type: none"> ○ Cannot be excluded by generic provisions in commercial lease agreements; ○ Should be complied with as and when specific circumstances justify its application; and ○ Should be addressed in the RIA's policy and procedure documents. <p>Thus, the RIA must, in terms of:</p> <ul style="list-style-type: none"> ○ Section 173(4) – give 48 hours' notice of proposed entry to a place for the purpose of doing works to the occupier or owner; ○ Section 174(1) – give notice of proposed entry in writing and set out the purpose of the entry; ○ Section 174(3) – give notice at a later stage even if it may enter a place under the Act without having to give notice of proposed entry; ○ Section 175(2) - perform the prescribed actions before entering the premises, if an occupier is present when the licensee proposes to enter a dwelling; 	<p>The RIA shall refer appropriately to these compliance obligations in relevant control documents, such as the Water Customer Services Manual. Which will include :</p> <ul style="list-style-type: none"> ○ Section 173(4) – give 48 hours' notice of proposed entry to a place for the purpose of doing works to the occupier or owner; ○ Section 174(1) – give notice of proposed entry in writing and set out the purpose of the entry; ○ Section 174(3) – give notice at a later stage even if it may enter a place under the Act without having to give notice of proposed entry; ○ Section 175(2) - perform the prescribed actions before entering the premises, if an occupier is present when the licensee proposes to enter a dwelling; ○ Section 175(5) - leave a notice or a copy of the warrant (as applicable) in a prominent position in the 	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	<p>30 June 2020</p>

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		<ul style="list-style-type: none"> ○ Section 175(5) - leave a notice or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling, if the licensee enters a dwelling that is unoccupied; ○ Section 176(1) - leave the premises as soon as practicable after being notified the owner or occupier has refused or withdrawn their consent to enter a place; ○ Section 176(3) - produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so; ○ Section 176(4) - produce evidence of authority for entry to a place upon the owner's or occupier's request, and leave a place if they are unable to do so; and ○ Section 181 – comply with any reasonable request from the owner or occupier intended to limit interference with the lawful activities of the owner or occupier. • The RIA should ensure that its control documents refer appropriately to these compliance obligations. 	<ul style="list-style-type: none"> dwelling before leaving the dwelling, if the licensee enters a dwelling that is unoccupied; ○ Section 176(1) - leave the premises as soon as practicable after being notified the owner or occupier has refused or withdrawn their consent to enter a place; ○ Section 176(3) - produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so; ○ Section 176(4) - produce evidence of authority for entry to a place upon the owner's or occupier's request, and leave a place if they are unable to do so; and ○ Section 181 – comply with any reasonable request from the owner or occupier intended to limit interference with the lawful 		

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			activities of the owner or occupier.		
8/2019	<p>Rating- D 3</p> <ul style="list-style-type: none"> ○ Paxon could not find a direct reference in the RIA's Customer Manual regarding the RIA's right to refuse to provide or to suspend the provision of a service to a customer who refuses to comply with a prescribed requirement relating to the provision of the service; and ○ Paxon examined the RIA's Customer Manual and the webpage entitled: <i>"Supply of Water Services on Rottne Island"</i> but could not find any references regarding: <ul style="list-style-type: none"> • How to apply for a connection; • Things that a customer must do, and the things that must be complied with, before a connection is made; • Fees that apply in relation to connections and when the fees are payable; and <p>Period mentioned in clause 9(2) in which standard supply connections as defined in clause 9(1) are required to be completed.</p>	<p>The RIA should update its Customer Manual content to include appropriate content regarding connections to water services, so as to comply with the stipulations of clauses 8(1)—(3) of the Water Services Code of Conduct (Customer Service Standards) 2018 (2018 Code of Conduct).</p> <p>The RIA should review all its other documents to ensure such documents refer to the 2018 Code of Conduct (and not the 2013 Code of Conduct). This will help ensure the RIA complies with its current obligations.</p>	<p>The RIA will update its Customer Manual content to include appropriate content regarding connections to water services, to comply with clauses 8(1)—(3) and review other documentation to ensure compliance with the 2018 Code of Conduct.</p>	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020
9/2019	<p>Rating- D 2</p> <ul style="list-style-type: none"> ○ Paxon confirmed by interview of the RIA's Environment, Health and Compliance 	<p>The RIA should ensure its lease agreements and working practices comply with the stipulations of clauses 9(2) and (4) of the Code of Conduct.</p>	<p>The RIA will ensure all new lease agreements comply with the stipulations of clauses 9(2) and (4) of the Code of Conduct,</p>	<p>Director Contracts and Planning</p>	30 June 2020

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	<p>Coordinator that, during the Audit Period:</p> <ul style="list-style-type: none"> The RIA made only one connection in respect of a new development; and This single point connection was made as per the lease agreement. <p>Paxon was not provided with any evidence as to whether the 10-business day rule for completing a connection was complied with.</p>	Thus, connections must be completed before the end of 10 business days starting from when the customer has paid the relevant fees and complied with the relevant requirements.	to outline the 10-business day rule for all new properties.	Leasing and Development Manager	
10/2019	<p>Rating- D 3</p> <p>Paxon examined a sample of tax invoices issued, by McGees Property on behalf of the RIA, during the Audit Period and found these invoices included the information stipulated in clause 13(6) of the 2018 Code of Conduct except for clauses 13(6)(e), (g), (h) and (i).</p>	The RIA should update its tax invoices to ensure it contains all the prescribed information included in clause 13(6) of the 2018 Code of Conduct.	The RIA will update and ensure that tax invoices contains all the prescribed information included in clause 13(6) of the 2018 Code of Conduct.	Director Contracts and Planning Leasing and Development Manager	30 June 2020
11/2019	<p>Rating- D 1</p> <ul style="list-style-type: none"> Paxon confirmed by interview of the McGees Property Manager that, during the Audit Period, no written information existed in relation to granting a discount to a RIA customer charged for higher consumption because of a leak in the customer's system. 	The RIA should compile and implement a written policy, standard or set of guidelines in relation to granting a discount to a customer charged for higher consumption because of a leak in the customer's system, so as to comply with the stipulations of clauses 17(2) and (3) of the 2018 Code of Conduct.	The RIA will develop and implement a policy standard or set of guidelines in relation to granting a discount to a customer charged for higher consumption because of a leak in the customer's system, so as to comply with the stipulations of clauses 17(2) and (3) of the 2018 Code of Conduct.	Director Contracts and Planning Leasing and Development Manager	30 June 2020
12/2019	Rating- D NR	The RIA should update its Customer Manual's content regarding the recovery period for undercharged amount so as to comply with the	The RIA will update its Customer Manual's content regarding the recovery period for undercharged amount so as	Director Contracts and Planning	30 June 2020

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	<ul style="list-style-type: none"> ○ Paxon examined the RIA's Customer Manual which states under the heading: <i>"2.4 Review of a Bill"</i>: <i>"Offer the customer the opportunity to pay this amount in instalments, interest free, over the same period of time during which you were undercharged."</i>; and ○ Paxon notes this statement differs from the stipulations of clause 18(5) of the 2018 Code of Conduct which refers to recovery of the undercharged amount over the shorter of the following periods: <ul style="list-style-type: none"> • A period for the same amount of time in which the undercharging occurred; and • A period of 12 months 	stipulations of clause 18(5) of the 2018 Code of Conduct.	to comply with the stipulations of clause 18(5) of the 2018 Code of Conduct.	Leasing and Development Manager	
13/2019	<p>Rating- D 3</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's Customer Manual which states under the heading: <i>"2.4 Review of a Bill"</i>: <i>The Rottneest Island Authority will: ... Provide the refunds of any overcharged amount within 15 days of your lodged request."</i> <p>Paxon found the RIA's Customer Manual does not refer to a customer's instruction to credit the overcharged amount to the</p>	The RIA should update its Customer Manual's content to include a reference regarding crediting an overcharged amount to the customer's account as instructed, so as to comply with the stipulations of clause 19(3) of the 2018 Code of Conduct.	The RIA will update the Customer Manual's to include a reference regarding crediting an overcharged amount to the customer's account as instructed, to ensure compliance with the stipulations of clause 19(3) of the 2018 Code of Conduct.	Director Contracts and Planning Leasing and Development Manager	30 June 2020

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	customer's account within 15 business days of the licensee receiving the instructions.				
14/2019	<p>Rating- D 3</p> <ul style="list-style-type: none"> ○ Paxon examined several e-mails regarding the bill review requests and the resulting findings of overcharging of customers. However, Paxon could not find any evidence regarding the RIA: • Informing the customer of the outcome of the bill review within 15 business days from the day the customer's request for review was received; • Receiving customer instructions for refunding the overcharged amount, or crediting the overcharged amount to the customer's account within 15 business days of the RIA receiving the instructions; nor • Notifying the customer immediately after crediting the overcharged amount to the customer's account. 	The RIA should keep proper records as evidence of compliance with its legislative obligations.	The RIA will update the Customer Manual's to include a reference to the management of overcharging of customers and how to maintain evidence for compliance.	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020
15/2019	<p>Rating – C 3</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's Customer Manual which states under the heading: "2.4 Review of a Bill": <p><i>"...if the RIA is satisfied that the bill is correct, the RIA may: Provide the customer with information</i></p>	<p>The RIA should update its Customer Manual's content so as to comply with the stipulations of clause 20(4) of the 2018 Code of Conduct by:</p> <ul style="list-style-type: none"> ○ Specifically stating the customer may, but does not have to, use the RIA's complaints procedure before or instead of the procedures under 	<p>RIA will update its Customer Manual to address:</p> <ul style="list-style-type: none"> ○ Specifically stating the customer may, but does not have to, use the RIA's complaints procedure before or instead of the 	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020

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	<p><i>concerning the process and operation of both the RIA's internal and external complaints handling process, which includes the customer's right to refer any complaint to the Energy and Water Service Ombudsman.</i>"; and</p> <ul style="list-style-type: none"> ○ Paxon found the RIA's Customer Manual does not: <ul style="list-style-type: none"> • Specifically state the customer may, but does not have to, use the RIA's complaints procedure before or instead of the procedures under sections 20(4)(a) or (b) of the 2018 Code of Conduct; and <p>Refer to making an appeal from or applying for a review of a decision to the State Administrative Tribunal.</p>	<p>sections 20(4)(a) or (b) of the 2018 Code of Conduct; and</p> <ul style="list-style-type: none"> ○ Referring to making an appeal from or applying for a review of a decision to the State Administrative Tribunal. 	<p>procedures under sections 20(4)(a) or (b) of the 2018 Code of Conduct; and</p> <ul style="list-style-type: none"> ○ Referring to making an appeal from or applying for a review of a decision to the State Administrative Tribunal. 		
16/2019	<p>Rating – C 1</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's Customer Manual which states under the heading: <i>"2.2 Pricing, Fees and Consumption Charges"</i>: <i>"Prices for the Rottnest Island Authority's water services are provided in the Schedule of Utility Tariffs, Fees and Charges. The RIA determines the water supply fees and charges annually."</i>; and ○ Paxon found the RIA's Customer Manual does not refer to giving such notice not 	<p>The RIA should update its Customer Manual's content to include a reference regarding giving notice of changes to water services amounts or rates not later than the issue of the next bill for such a water service charge, so as to comply with the stipulations of clauses 21 of the 2018 Code of Conduct.</p>	<p>The RIA will update its Customer Manual to include a giving notice of changes to water services amounts or rates to ensure compliance with the stipulations of clauses 21 of the 2018 Code of Conduct.</p>	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	<p>30 June 2020</p>

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	later than when the next bill for a water service charge of that kind is issued				
17/2019	<p>Rating – D 2</p> <ul style="list-style-type: none"> o Paxon confirmed by interview of the McGees Property Manager that, during the Audit Period, McGees Property informed RIA customers telephonically, on bill payment of the charges for credit card payments; and o Paxon found neither the RIA's Customer Manual nor a sample of tax invoices examined inform the customer of the fees and charges (if any) associated with each bill payment method offered. 	The RIA should update its Customer Manual's content, website and tax invoices to include references regarding the fees and charges associated (if any) with each bill payment method offered so as to comply with the stipulations of clause 24(2) of the 2018 Code of Conduct.	The RIA will update the Customer Manual, website and tax invoices to include references regarding the fees and charges associated (if any) with each bill payment method offered so as to comply with the stipulations of clause 24(2) of the 2018 Code of Conduct.	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020
18/2019	<p>Rating – D NR</p> <ul style="list-style-type: none"> o Paxon examined the RIA's Customer Manual which states under the heading: "2.6 Late Payment Fee and Other Charges": <i>"The Rottneest Island Authority may charge the customer a late payment fee if you do not pay your bill on or before the due date specified."</i>; and <p>Paxon found the RIA's Customer Manual does not refer to not charging interest or fees for late payment of a bill by a customer</p>	The RIA should update its Customer Manual's content to include a reference regarding not charging interest or fees for late payment of a bill by a customer in the specified circumstances (complaint regarding non-payment of a bill), so as to comply with the stipulations of clause 32 of the 2018 Code of Conduct.	The RIA will update the Customer Manual to include reference regarding not charging interest or fees for late payment of a bill by a customer in the specified circumstances (complaint regarding non-payment of a bill), so as to comply with the stipulations of clause 32 of the 2018 Code of Conduct.	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020

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	in the specified circumstances (complaint regarding non-payment of a bill).				
19/2019	<p>Rating – Various</p> <p>Paxon examined the RIA's Customer Manual which does not address cutting off or reducing the rate of flow of water to land under section 95(1)(b) of the Act for non-payment of water service charges.</p>	The RIA should update its Customer Manual to address cutting off or reducing the rate of flow of water to land under section 95(1)(b) of the Act for non-payment of water service charges.	RIA will update its Customer Manual to address cutting off or reducing the rate of flow of water to land under section 95(1)(b) of the Act for non-payment of water service charges.	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020
20/2019	<p>Rating – C 1</p> <ul style="list-style-type: none"> o Paxon examined the RIA's Customer Manual which states under the heading: <i>"4.1 Entry to Customer's Property – Planned interruption to water supply"</i>: <i>"The Rottnest Island Authority will make every effort to minimize the interruption to your water supply, but on occasion planned maintenance on the water services needs to be carried out. The Rottnest Island Authority aims to provide the customer with notice 24 hours in advance if the water supply needs to be interrupted for planned work."</i> (emphasis added); and o The 2018 Code of Conduct stipulates in section 43: <i>"(1) A licensee must give notice of any planned service interruption to each</i> 	The RIA should update its Customer Manual to refer appropriately to its obligation to inform customers who will be effected by a planned service interruption not less than 48 hours in advance, unless not reasonably practicable (so as to comply with clauses 43(1) and (2) of the 2018 Code of Conduct).	RIA will update its Customer Manual to address its obligation to inform customers who will be effected by a planned service interruption not less than 48 hours in advance, unless not reasonably practicable (so as to comply with clauses 43(1) and (2) of the 2018 Code of Conduct).	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 June 2020

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	<p>customer that will be affected by the service interruption.</p> <p>(2) The notice must be given —</p> <p>(a) not less than 48 hours before the start of the service interruption; or</p> <p>(b) if it is not reasonably practicable to comply with paragraph (a), at the earliest practicable time before the start of the service interruption."</p> <p>Thus, the RIA's "aim to provide the customer with notice 24 hours in advance", as included in its Customer Manual, does not meet the standards set in clauses 43(1) and (2) of the 2018 Code of Conduct.</p>				
21/2019	<p>Rating – D 3</p> <ul style="list-style-type: none"> ○ Paxon found the RIA's "Water Services Recovery & Contingency Plan" does not address: <ul style="list-style-type: none"> • The potential or actual impact on customer (in adequate detail), other effected persons and entities, property and the environment; • The action or actions that must be taken to ensure that, in the event of a wastewater spill from the sewerage works of the licensee onto a customer's property, damage and inconvenience to the customer and other persons or entities are minimised; and 	<ul style="list-style-type: none"> • The RIA must update its policies, practices and procedures to ensure it addresses: <ul style="list-style-type: none"> ○ The potential or actual impact of a burst, leak or blockage on customer (in adequate detail), other effected persons and entities, property and the environment; ○ the action or actions that must be taken to ensure that, in the event of a wastewater spill from the sewerage works of the licensee onto a customer's property, damage and inconvenience to the 	<p>The RIA will update the Water Services Recovery & Contingency Plan" to ensure that it covers:</p> <ul style="list-style-type: none"> ○ The potential or actual impact of a burst, leak or blockage; ○ the action or actions that must be taken to ensure that, in the event of a wastewater spill from the sewerage works of the licensee onto a customer's property, damage and inconvenience to the customer and other persons 	<p>Director Infrastructure</p> <p>Manager Water and Gas Infrastructure</p>	<p>30 June 2020</p>

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	<ul style="list-style-type: none"> The action or actions that must be taken to ensure that, in the event of a wastewater spill from the sewerage works of the licensee, the spill is promptly cleaned, and the affected area is disinfected 	<p>customer and other persons or entities are minimised; and</p> <ul style="list-style-type: none"> The action or actions that must be taken to ensure that, in the event of a wastewater spill from the sewerage works of the licensee, the spill is promptly cleaned, and the affected area is disinfected. 	<p>or entities are minimised; and</p> <ul style="list-style-type: none"> The action or actions that must be taken to ensure that, in the event of a wastewater spill from the sewerage works of the licensee, the spill is promptly cleaned, and the affected area is disinfected. 		
22/2019	<p>Rating – D 2</p> <ul style="list-style-type: none"> Paxon confirmed by interview of an RIA Representative that the RIA did not develop its complaints procedure using as minimum standards the relevant provisions of AS/NZS 10002-2014. 	<p>The RIA should revise its complaints procedure using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's "Customer Complaints Guidelines: distinguishing customer queries from complaints – December 2016."</p>	<p>The RIA will update the <i>utilities customer complaints procedure</i> in line with the relevant provisions of AS/NZS 10002-2014 and the ERA's "Customer Complaints Guidelines: distinguishing customer queries from complaints – December 2016."</p>	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	31 October 2020
23/2019	<p>Rating – C 2</p> <ul style="list-style-type: none"> Paxon found the RIA website provides links to: <ul style="list-style-type: none"> "Utilities Customer Complaints Procedure"; and "Utility (Electricity, Water and Gas) Customer Complaint Form". Paxon found the RIA's "Utilities Customer Complaints Procedure": 	<p>The RIA should update its "Utilities Customer Complaints Procedure" so as to comply with the stipulations of clause 46(3) of the 2018 Code of Conduct by:</p> <ul style="list-style-type: none"> Including appropriate detail as to the methods the RIA will use to respond to complaints; Categorically referring to the RIA's obligation to resolve a complaint before the end of the period of 15 	<p>The RIA will update the <i>utilities customer complaints procedure</i> to:</p> <ul style="list-style-type: none"> - appropriate detail as to the methods the RIA will use to respond to complaints; - Categorically referring to the RIA's obligation to resolve a complaint before the end of the period of 15 business 	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	31 October 2020

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	<ul style="list-style-type: none"> Records street addresses, postal addresses, telephone numbers, fax numbers and e-mail addresses for lodgement of complaints; Includes a link to the <i>"Utilities Customer Complaints form"</i> available on RIA website for recording complaints; States: <i>"The RIA will aim to acknowledge written queries or complaints by a customer within 10 business days and respond to queries or complaints by addressing the matters within 15 business days."</i> (emphasis added – addressing and not resolving); Provides contact details for the <i>"Energy and Water Ombudsman Western Australia"</i> for instances where complaints have not been resolved internally in a manner acceptable to the customer; and Refers to the <i>"Water Services Code of Conduct (Customer Service Standards) 2013"</i> (not the 2018 Code of Conduct). <p>○ Paxon found the <i>"Utilities Customer Complaints Procedure"</i> does not refer to</p>	<p>business days starting on the day the complaint was received; and</p> <p>○ Referring to the 2018 Code of Conduct and not the 2013 Code of Conduct.</p>	<p>days starting on the day the complaint was received; and</p> <p>- Referring to the 2018 Code of Conduct and not the 2013 Code of Conduct</p>		

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	the method the RIA will use to respond to complaints.				
24/2019	<p>Rating – D 2</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's <i>"Utilities Customer Complaints Procedure"</i> which only refers to applying to the water services ombudsman and not to making an appeal from, or applying for a review of, the decision that gave rise to the complaint, if an appeal or review is available under regulations mentioned in section 222(2)(k) of the Act. 	The RIA should update its <i>"Utilities Customer Complaints Procedure"</i> to refer to the alternative complaints procedure available to customers under section 222(2)(k) of the Act.	The RIA will update the <i>utilities customer complaints procedure</i> to refer to the alternative complaints procedure available to customers under section 222(2)(k) of the Act.	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	31 October 2020
25/2019	<p>Rating – B 2</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's <i>"Utilities Customer Complaints Procedure"</i> which states: <i>"The customer has the right to raise the electricity or water complaint with the Energy and Water Ombudsman."</i> ○ Paxon found the RIA's <i>"Utilities Customer Complaints Procedure"</i> also records a street address, postal address, phone number, free call number and e-mail address for the Energy and Water Ombudsman regarding: <i>"complaints that have not been resolved internally in a manner acceptable to the customer"</i>. 	<ul style="list-style-type: none"> • The RIA's actual practice should be, and its documented procedures should state that once the RIA considers that a customer's complaint has been resolved, it must: <ul style="list-style-type: none"> ○ Advise the customer accordingly; and ○ Inform the customer of the right to apply to the water services ombudsman for a review of the complaint. 	<p>The RIA will update the <i>utilities customer complaints procedure</i> to include resolution of complaints where once the RIA considers a complaint to be resolved, the RIA will:</p> <p>(1) advise the customer they consider the complaint to be resolved; and</p> <p>(2) inform the customer of their right to go to the ombudsman for a review of their complaint.</p>	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	31 October 2020

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	<ul style="list-style-type: none"> ○ Paxon examined the RIA's Customer Manual which under the heading: "3.4.2 Complaints Procedure": <ul style="list-style-type: none"> • Refers to the customer's right to apply to the water service ombudsman for a review of a complaint; and • Provides a "Free Call" number for the water service ombudsman. ○ Paxon is of the opinion the above-mentioned documented procedures only imply that the customer has a right to apply to the water services ombudsman for a review of the complaint. These documented procedures do not specifically state that once the RIA considers that a customer's complaint has been resolved, it must: <ul style="list-style-type: none"> • Advise the customer accordingly; and • Inform the customer of the right to apply to the water services ombudsman for a review of the complaint. 				
26/2019	<p>Rating – D 2</p> <ul style="list-style-type: none"> ○ Paxon found the RIA's website does not include appropriate references to the: <ul style="list-style-type: none"> • Power of a person authorised by a licensee under section 129 to enter a place without consent, notice or warrant to read a meter connected to the licensee's water service works; 	The RIA should ensure all the information stipulated in clause 49(1) of the 2018 Code of Conduct is publicly available.	<p>The RIA will provide a link to the 2018 Code of Conduct on its website.</p> <p>The RIA will make the following information publicly available —</p>	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	July 2020

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	<ul style="list-style-type: none"> • Concessions available to customers; • That under section 95(1)(b), the licensee may cut off, or reduce the rate of flow of, a supply of water if a water service charge remains unpaid for 30 days after it becomes due; • Limitations to the RIA's rights under clause 49(1)(g) of the 2018 Code of Conduct if the customer is offered a payment plan or other arrangement giving the customer more time to pay the bill or to pay arrears; • That under section 95(3), the supply of water cannot be cut off to an occupied dwelling unless the occupier agrees; and • Sustainable use of water. 		<p>(a) the fees and charges that will be imposed and collected by the licensee;</p> <p>(b) the licensee's bill payment method options and the fees and charges (if any) associated with each bill payment method offered;</p> <p>(c) the concessions that are available to customers;</p> <p>(d) the services provided by the licensee under clause 48;</p> <p>(e) the power of a person authorised by a licensee under section 129 to enter a place without consent, notice or warrant to read a meter connected to the licensee's water service works;</p> <p>(f) the obligations of customers under the regulations to ensure that access to a meter is available;</p> <p>(g) that under section 95(1)(b), the licensee may cut off, or reduce the rate of flow of, a supply of water if a water service charge remains unpaid</p>		

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
			<p>for 30 days after it becomes due;</p> <p>(h) that if the customer is offered a payment plan or other arrangement giving the customer more time to pay the bill or to pay arrears, the licensee's power as mentioned in paragraph (g) can only be exercised if —</p> <p>(i) the customer has not accepted the offer within the period of 7 days after the day on which it was made; or</p> <p>(ii) having entered such a plan or other arrangement, the customer does not comply with it;</p> <p>(i) that under section 95(3), the supply of water cannot be cut off to an occupied dwelling unless the occupier agrees;</p> <p>(j) the quality of water and its management;</p> <p>(k) sustainable use of water;</p> <p>(l) planned and unplanned interruptions of water supply or other incidents that may</p>		

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
			significantly affect the provision of water services to customers.		
27/2019	<p>Rating</p> <ul style="list-style-type: none"> ○ Paxon found the RIA's website does not include appropriate references to: <ul style="list-style-type: none"> • If a bill is based on an estimate, that the licensee will tell a customer on request the reason for and basis of the estimate (Paxon found such references only within a sample of tax invoices examined); and • That a customer may request the testing of a meter and that if the customer so requests, information about the fees that apply and when the fees may be reimbursed. 	The RIA should ensure the information stipulated in clause 49(2) of the 2018 Code of Conduct is publicly available.	<p>The RIA will provide a link to the 2018 Code of Conduct on its website.</p> <p>The RIA will make the following information publicly available —</p> <p>(a) the fees and charges that will be imposed and collected by the licensee;</p> <p>(b) the licensee's bill payment method options and the fees and charges (if any) associated with each bill payment method offered;</p> <p>(c) the concessions that are available to customers;</p> <p>(d) the services provided by the licensee under clause 48;</p> <p>(e) the power of a person authorised by a licensee under section 129 to enter a place without consent, notice or warrant to read a meter connected to the licensee's water service works;</p>	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	July 2020

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
			<p>(f) the obligations of customers under the regulations to ensure that access to a meter is available;</p> <p>(g) that under section 95(1)(b), the licensee may cut off, or reduce the rate of flow of, a supply of water if a water service charge remains unpaid for 30 days after it becomes due;</p> <p>(h) that if the customer is offered a payment plan or other arrangement giving the customer more time to pay the bill or to pay arrears, the licensee's power as mentioned in paragraph (g) can only be exercised if —</p> <p style="padding-left: 40px;">(i) the customer has not accepted the offer within the period of 7 days after the day on which it was made; or</p> <p style="padding-left: 40px;">(ii) having entered such a plan or other arrangement, the customer does not comply with it;</p> <p>(i) that under section 95(3), the supply of water cannot be cut</p>		

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
			<p>off to an occupied dwelling unless the occupier agrees;</p> <p>(j) the quality of water and its management;</p> <p>(k) sustainable use of water;</p> <p>(l) planned and unplanned interruptions of water supply or other incidents that may significantly affect the provision of water services to customers.</p>		
28/2019	<p>Rating - D 2</p> <ul style="list-style-type: none"> o Paxon found the RIA's Customer Manual includes a link to the RIA webpage on which the Customer Manual can be found. However, this webpage does not include a direct link to the 2018 Code of Conduct, appearing on the website maintained by or on behalf of the Western Australian Government which provides public access to electronic versions of Western Australian legislation. 	The RIA should provide a link to the 2018 Code of Conduct on its website, so as to comply with the stipulations of clause 49(3) of the said Code	The RIA will provide a link to the 2018 Code of Conduct on its website,	<p>Director Contracts and Planning</p> <p>Leasing and Development Manager</p>	30 July 2020
30/2019	<p>Rating – C 2</p> <ul style="list-style-type: none"> o Paxon requested proof of such payments but was only provided with a remittance advice for a single payment made in December 2018. Thus, Paxon could not confirm that, during the Audit Period, the 	The RIA must keep appropriate documentation to help confirm compliance with all the legislative obligations regarding the water services it provides.	The RIA will implement a <i>Compliance Management System</i> which records all its obligations in terms of the Water Legislation. The CMS will include a licence register,	Director Environment Heritage and Parks	30 Oct 2020

Recommendation reference (no/year)	Non-Compliance/Control improvement	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
	RIA paid the applicable fees and charges in accordance with the applicable regulations.		including payment, obligations register and policy and procedures relating.	Environment, Health and Compliance Manager	
31/2019 (03/2017)	<p>Rating – A 2</p> <ul style="list-style-type: none"> ○ Paxon examined the RIA's performance datasheets for 2016-2017 and found it did not provide either the number or percentage of connected properties that were supplied at a pressure and flow that met the standards set out in the licence (12-month data); ○ Paxon examined the RIA's performance datasheets for 2017-2018 and found it did not provide either the number or percentage of connected properties that were supplied at a pressure and flow that met the standards set out in the licence (12-month data); and ○ Paxon has noted the RIA's 2017-2018 Compliance Report states: <i>"Due to the non-pressurised potable distribution network on Rottne Island it is anticipated that the minimum static pressure and minimum flow of 15 meters and 20 litres per minute respectively, cannot be maintained."</i> 	The Ria should measure pressure and flow for connected properties and report it on an annual basis to the ERA as part of its annual performance reports.	<p>The RIA will install metering equipment to enable potable water flow and pressure is recorded.</p> <p>Potable water flow meters are planned to be installed for the Bathurst, Caroline Thomson and Campground distribution network.</p> <p>The RIA will measure pressure and flow for connected properties and report it on an annual basis to the ERA as part of its annual performance reports.</p>	Director Infrastructure Manager Water and Gas Infrastructure	30 October 2020

RIA Asset Management System Review - Post Review Implementation Plan – ERA Water Services

Recommendation reference (no/year)	Asset management effectiveness rating/Asset Management System Component & Criteria/details of the issue	Auditor's Recommendation	Action proposed to be taken by the licensee	Responsible Person(s)	Target Completion Date
Unresolved from Last Audit (2017)					
2019 Audit					
33/2019 (5/2017)	The lifecycle costs of the water assets have not yet been assessed and budgeted for by the RIA.	As planned, the RIA should develop lifecycle costing models for the potable water services and the wastewater treatment services, including completing the condition assessments and populating the asset register in the Maximo system (above-ground assets have been completed). The lifecycle costs should be considered in the long-term planning and budgeting for provision of the services.	RIA will develop lifecycle costing models for the potable water services and the wastewater treatment services, including completing the condition assessments and populating the asset register in the Enterprise Asset Management System (above-ground assets have been completed). The lifecycle costs will be considered in the long-term planning and budgeting for provision of the service.	Director Infrastructure Project Manager - Enterprise Asset Management System	30 October 2020