



Mr Paul Reid
Assistant Director, Monitoring
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear Mr Reid

Draft Incident Reporting Manual for Western Australian Electricity, Gas and Water Licences

The Department of Water thanks the Economic Regulation Authority for the opportunity to provide comments on the Draft Incident Reporting Manual for Western Australian Electricity, Gas and Water Licensees. The Department is supportive of the development of an Incident Reporting Manual for water licensees as a way of ensuring that health, safety, environmental and public interests are met.

The role of the Department is to promote an operating environment where safe, fit-for-purpose water services are provided at the least cost to customers through industry competition and water efficiency. This is derived from the overarching objectives reflective of the State Water Plan 2007 summarised in the following key points:

- creating a competitive environment for water service providers to operate in;
- ensuring appropriate health standards are met;
- to ensure appropriate water services and operational standards are maintained;
- to ensure customer service standards are maintained;
- to ensure sufficient water for life while promoting water efficient behaviours;
- to ensure sustainability of the environment and water supply; and
- to ensure cost effectiveness in supplying the water services.

The purpose of incident reporting of water licensees is to reduce or manage the risk associated with public health and safety in the provision of water supply. Tools that are introduced into the regulatory environment should address key economic, social, public health and environmental aims of Government and private water licensees.

By requiring a number of government agencies, such as the Department of Health and Department of Environment and Conservation, to be alerted at the same time, it provides a streamlined approach to being notified and respond to an incident.

The Department recommends that the Minister for Water should also be alerted to incidents as provided in the Manual. Currently, it is neither a legislative nor licensing requirement to inform the Minister on incidents that may cause damage, loss or disruption to customers or endanger the safety or health of a person or environment. By raising the Minister's and the Department's awareness on such critical issues will assist the Department's ability to address the issues through policy development and provide timely advice to the Minister.

This is consistent with the Department's objective in creating a safe and sustainable operating environment for water service providers and customers.

Should you require any further information, please contact Megan Chinnery, Policy Officer, Water Services Policy on 6364 7148.

Yours sincerely

Don Crawford
Branch Manager, Water Industry Support Branch

6 March 2009