

7 May 2014

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Unitywater
Draft Interim Connections Policy
PO Box 953
Caboolture, Qld 4510



Dear Sir/Madam

Draft Interim Connections Policy



Thank you for the opportunity to provide feedback on Unitywater's draft *Interim Connections Policy* (ICP). The Property Council appreciates Unitywater's ongoing engagement with the industry in its transition to the Utility Model.



As previously raised directly with Unitywater and the State Government, the Property Council is concerned that the water distributor-retailers will not be adequately prepared or resourced on 1 July 2014, to undertake the duties required under the Utility Model.



While the ICP provides a general overview of the role of Unitywater in the connections and disconnections process, it is missing details necessary for the industry to determine which assessment category they will be subject to, and how to proceed with the application process.



The table at the top of page 1 outlines a number of documents and supporting legislation related to the ICP. It is unclear, however, to which sections of the ICP they relate, or how the user is expected to cross-reference them.



Likewise, the website lists a series of maps which outline Unitywater's Connection Area and Future Connections Area. The ICP however, only references the names of these areas; it does not provide guidance on how to determine whether or not a site is within a defined area, or identify to the user that a series of maps exists to support the defined areas.



Other documents, such as the Fees and Charges Schedule, are referenced within the ICP, and like the Connection Areas, there is no indication as to where they can be sourced.



While the Property Council appreciates the time constraints the ICP has been developed within, in its current format, the ICP will do little to ease the industry's confusion surrounding the transition to the Utility Model.



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Although the ICP developed by Queensland Urban Utilities is yet to be publicly released, advanced copies provided to the Property Council indicate it is a more closely aligned with the provisions and definitions within the legislation, and provides clear links back to the legislation and other relevant documents and processes.

It is recommended that Unitywater review the ICP developed by Queensland Urban Utilities, to ensure a level of consistency between the legislation and the connections policies of both distributor-retailers.



The Property Council is keen to continue its engagement with Unitywater to ensure a streamlined transition to the Utility Model, which will provide a simpler, more efficient connections and disconnections process for all stakeholders.



Should you have any further questions regarding the Property Council or this submission, please do not hesitate to contact me on kmacdermott@propertyoz.com.au or 07 3225 3000.



Yours sincerely



Kathy Mac Dermott
Executive Director

