

Hydro International response to consultation on Code for Adoption Agreements

1. Do you agree with our preferred approach in terms of the content and scope of our Code? Please explain your answer.

In principle, I do agree with the preferred approach proposed in the consultation. I think this give all parties more clarity in what is expected from them before initiating the process and, therefore, reducing efforts wasted. I do think there should be a greater emphasis on encouraging innovation aspects of the code to gain greater investment and opportunities in applying new ideas and products to meet our changing water services challenges. I do not believe that just allowing an avenue for innovation is enough, however, encouraging and prioritising innovation will allow a more adaptive water industry.

2. Do you agree with our proposed code principles and their definitions? Please explain your answer.

I do agree with the principles and definitions.

3. Do you think our proposed minimum information and publication requirements are appropriate and sufficient?

Yes, this will be beneficial for the process. I do also think there should be 'publication requirements' for developers also who are feeding information into the water companies developer services teams. If water companies are helping developers by providing more information, developers should also be encouraged that there should be a minimum amount of information submitted to also help speed up the process.

4. Do you agree with our proposed approach of requiring companies to develop Sector Documents and Model Adoption Agreements in consultation with Developer Service Customers, according to a set of minimum requirements?

Yes

5. Do you agree with our proposed minimum requirements? Please explain your answer.

Yes

6. Do you agree with our proposed approach to deviations? Please explain your answer.

As indicated above, I do not think the deviation agreement actively aids or encourages innovation within the industry. The process should be simpler. I believe that a deviation should be able to be accepted by the water company as long as the water company have had adequate information, performance guarantees/data, and maintenance information supplied with the application. Adding additional formal processes and written applications will discourage innovation and a change from the norm.

7. Do you have any comments on our proposed approach to governing the initial approval of and subsequent changes to the Sector Documents and Model Adoption Agreements?

No, and I do agree with the governance procedure proposed.

8. Do you consider the proposed timeline for submitting the Sector Documents and Model Adoption Agreements to us for approval to be realistic and achievable? If not, what would you consider to be a suitable timeline?

I believe the timings are appropriate.

9. Do you have any comments on the assurances the sector will be required to provide to us when submitting the Sector Documents and Model Adoption Agreements to us for approval?

None at present.

10. Do you have any comments on our proposed transitional arrangements to enable companies to comply with the Sector Documents and Model Adoption Agreements?

None at present.