

Concealed Leaks Policy

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Head of Power

Section 19 of the *South East Queensland Customer Water and Wastewater Code* (the Code) requires a water service provider to have a concealed leaks policy for small customers.

Policy Objective

To provide a remission to small customers and not-for-profit entities on the water consumption charge where there is a concealed leak that has secreted from the internal water infrastructure located on a metered property.

Policy Statement

Redland City Council, through its Corporate Plan, is committed to providing services that deliver our community's shared vision and collective aspirations, *Naturally wonderful lifestyle. Connected community. Embracing opportunities.* We are a values led organisation and our Organisational values encapsulate what we care about, influence how we operate and support our mission: Make a difference, make it count.

Council is responsible for the water infrastructure up to the connection point of a customer's property, which includes the water meter and the pipes that connect the water meter to the main water supply.

Property owners are responsible for the installation, repair, maintenance, and replacement of all the pipes, fixtures and fittings, including any mains connected water tanks on their property up to the water meter. If a leak is detected it is the property owner's responsibility to fix it as soon as possible to prevent further water loss.

Property owners are encouraged to:

- Develop a habit of regularly reading the water meter, to familiarise themselves with their own water consumption habits, which may help alert them to unexplained increases in water consumption.
- Turn off the stop valve that controls the flow of water and appliances that are connected to the water supply when they go away on holidays and the house is not occupied.
- Check for suspected concealed water leaks by doing a reading test on the water meter. Turn off all water appliances and then read the water meter. Wait an hour or two before re-reading the water meter. If the reading has increased but no water was used in that period contact a licensed plumber to inspect for a concealed leak.
- Where a leak is detected it is repaired as soon as practical, preferably within five (5) business days.

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Council is committed to:

1. Providing a remission on Council's Distribution and Retail water consumption charge for a concealed water leak where eligibility requirements are met. Queensland State Government will provide a remission on the State Bulk water consumption charge for a concealed water leak where eligibility requirements are met.
2. The following eligibility requirements:
 - (a) Application must be made by the owner of the property where the leak occurred, or their authorised nominee, within five (5) months of the leak repair date to qualify for the remission.
 - (b) The leak must be repaired within thirty (30) days of:
 - i) The property owner identifying higher than usual water usage;
 - ii) The date that the property owner ought reasonably have identified higher than usual water usage; or
 - iii) Council notifying the property owner of higher than usual water use. Such notification may take the form of at least one of the following: SMS, email, letter, phone call or card left in the letterbox.
 - (c) During their ownership, the owner of the property has not received a water consumption remission on that property within the last three (3) years due to a concealed water leak.
3. Apply a minimum cap on the remission provided. Where the remission is calculated and is less than thirty five (35) dollars no remission will be applied, excluding eligible pensioners where the minimum cap will be twenty five (25) dollars.
4. Assessing applications correctly received on the nominated form (Concealed Water Leak application form) where the following information has been provided:
 - (a) An invoice or signed report from a licensed plumber with confirmation the leak was concealed and has been repaired within required plumbing standards.
 - (b) Two (2) water meter readings two (2) weeks apart that show water consumption for the property has returned to normal, with the first reading to be taken as soon as practical after the leak has been repaired. This may be used for calculation purposes.
 - (c) Photographic evidence, if available, in support of applications. Although photos are not mandatory they are desirable and will be used in conjunction with written evidence to support the application process in determining eligibility. Photos of the leak prior and post repair will be accepted and can form part of an application.
5. To calculate the remission the following information may be used:
 - (a) The date the leak was repaired;
 - (b) Average daily water use and cost calculated on the first given four (4) quarter period that is not leak effected excluding new owners where the average daily water use is based on readings taken after the leak is repaired;
 - (c) In lieu of a recent quarterly billing reading the first reading taken after the leak is repaired.
 - (d) The adopted Distribution and Retail water consumption charge; and
 - (e) The adopted State Bulk water consumption charge.
6. Calculate the remission based on two (2) reading periods (generally ≤ 190 days).

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7. Apply an 80% remission on the Distribution and Retail water consumption charge of the estimated water loss, excluding eligible pensioners who will receive a 100% remission on the Distribution and Retail water consumption charge of the estimated water loss.
8. Apply a 70% remission on the State Bulk water consumption charge of the estimated water loss, excluding eligible pensioners who will receive a 100% remission on the State Bulk water consumption charge of the estimated water loss.
9. Apply the remission as a financial adjustment to the customer's property account, which will be shown on the next quarterly rate notice.
10. Provide a once only opportunity during the period of ownership to replace a previous leak remission amount where a second major leak occurs within three (3) years of the first leak repair date where the calculated water loss for the second leak is greater than the calculated loss for the first leak. This is administered by the customer forgoing the first leak remission amount, which will be replaced by the approved calculated remission amount for the second leak. This does not affect the commencement of the three (3) year period stated in 2(c), which commenced from the date the first leak was repaired.
11. Provide an appeal process for applicants with extenuating circumstances to seek a variation to this policy to receive a greater remission than currently afforded under the Policy. The process involves the creation of an Extenuating Circumstances Panel and will provide property owners with an avenue to apply for a remission if extenuating circumstances exist.
 - i) The Extenuating Circumstances Panel will determine whether extenuating circumstances apply, which may, subject to determination by the Panel, include where:
 - repair of the concealed leak did not occur within the thirty (30) day timeframe allowed under paragraph 2(b) of this Policy; or
 - remission is sought in respect of 2 or more reading periods (provided that the 30 day timeframe allowed under paragraph 2(b) of this Policy has been complied with);
 - health issues or prolonged illness preventing the customer from remedying a concealed leak. Any appeal on these grounds should be supported by evidence in the form of certification from an appropriately qualified medical practitioner; or
 - an unidentified major leak which could not reasonable be prevented by the customer due to a natural disaster.
 - ii) Application must be made in writing setting out the extenuating circumstances and the extent of the policy variation sought.

The Extenuating Circumstances Panel will be comprised of the Executive Group Manager Financial Services and Chief Financial Officer, General Manager Infrastructure and Operations and Group Manager Corporate Governance, or three other senior officers as determined by the Chief Executive Officer. The Panel will decide whether a case for extenuating circumstances exists and what, if any, variation should be made to this Policy.

- The panel will decide the extent to which the policy will be varied, including the level of remission to be provided. For example, an extenuating circumstances remission application can be approved in full, approved in part or rejected (all with rationale) by the Extenuating Circumstances Panel.
 - The decision of the panel will be final, and no further appeal process will be available.
12. Provide flexible options to offer customers if they are experiencing financial difficulty, in accordance with Council's Financial Hardship Policy (FIN-004-P).

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Definitions

Term	Definition
Small customer	Defined as either: a) A residential customer who is connected to a SEQ service provider's water or wastewater service and receives a rate notice in their name that includes charges for water and wastewater services; or b) A non-residential customer who uses no more than 100 kilolitres of drinking water and/or reticulated recycled water per annum (based on the last four consecutive quarter water readings that are not leak affected).
Concealed leak	Where a loss of water has occurred that is hidden from view, either underground, under or within concrete, or underneath a building, where there are no visible signs of dampness or soaking and where the owner or occupant could not be reasonably expected to know of its existence. Note: It <i>does not</i> include water loss from: <ul style="list-style-type: none">• Leaking taps, toilet cisterns or other water appliances.• Leaks in water tanks or faulty tank float valves that are plumbed to the potable water supply.• Property sprinklers or other irrigation systems.• Leaking or plumbing related faults with hot water systems, which includes solar hot water systems.• Leaks in swimming pools, spas and other water features and fittings.
Not-for-profit entity	Not for profit entities: <ul style="list-style-type: none">• Are formed for a purpose that does not include the profit or gain of its individual members or owners;• Exist for any lawful purpose that provides a public benefit, at large or in a particular locality that improves or promotes community welfare, education, or safety; and• Has voluntary membership only. Examples include: <ul style="list-style-type: none">• Charity organisations• Religious organisations• Sporting and recreational clubs• Community service organisations• Cultural and social societies
Eligible Pensioner	A person in receipt of Council's pensioner rebate as verified by Council's database.

Associated Documents

Fact Sheet - Has your water usage increased?

https://www.redland.qld.gov.au/download/downloads/id/2239/has_your_water_usage_increased.pdf

Concealed water leak application form

https://www.redland.qld.gov.au/download/downloads/id/1441/concealed_leak_application_form.pdf

Extenuating Circumstances application form

https://www.redland.qld.gov.au/download/downloads/id/4875/crfs018_request_for_review_and_decision_under_corporate_policy.pdf

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Document Control

Changes to this policy can only be approved by Council through a Resolution at a Council Meeting. This policy is reviewed annually.

Approved amended documents must be submitted to the Corporate Meetings and Registers Team to place the document on the Policy, Guidelines and Procedures Register.

Version Information

Refer to Corporate Meetings and Registers Team for previous versions.

Version Number	Date	Key Changes
3	June 2014	The primary change to the policy is it has been reworded to improve readability. Amendments to the policy are: 1) Name change to the policy to comply with the policy name given in the Code. 2) Change to the Head of Power. 3) Inclusion of definitions for a small customer and a small business customer. 4) Updated definition of a concealed leak including exclusions. 5) To comply with the section 9(b) of the Code, inclusion of information to assist small customers to physically identify concealed leaks. 6) Extension of the time period in which a customer may apply for a concealed leak. 7) Clarification of how the average water consumption is calculated. 8) Transparency for the customer to be told if the average water consumption is calculated by another method. 9) Removal of reference to the General Manager Redland Water & RedWaste.
4	April 2017	The primary changes to the policy are based on the revised South East Queensland Customer Water and Wastewater Code. 1) How a remission payment is calculated. 2) Change to the reading period taken into consideration for the calculation from two periods to one. 3) Minimum remission cap to apply. 4) Allowance of photographic evidence to be supplied where available. 5) Change to the application deadline from four months to five.
5	June 2019	The primary changes to the policy are to create consistency in calculating and assessing remissions by: 1) Having a leak repaired as soon as practical. 2) Providing a reading as soon as practical after a repair. 3) Calculation on average daily use on four (4) quarters that is not leak affected. 4) New owners average daily use based on readings taken after the repair. 5) Using the adopted Distribution and Retail water charge. 6) Remission period covering two (2) reading periods. Remission shown on the quarterly rate notice.
5	June 2019	The primary changes to the policy are to create consistency in calculating and assessing remissions by: 1) Having a leak repaired as soon as practical. 2) Providing a reading as soon as practical after a repair. 3) Calculation on average daily use on four (4) quarters that is not leak affected. 4) New owners average daily use based on readings taken after the repair. 5) Using the adopted Distribution and Retail water charge. 6) Remission period covering two (2) reading periods. Remission shown on the quarterly rate notice.
6	October 2020	The primary change to the policy is it has been reworded to improve readability. Amendments to the policy are: 1) Document Control added to policy.

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Version Number	Date	Key Changes
		2) Prior Version Information to CMRT. Associated Documents added.
7	May 2021	Changes to the policy included: 1) Making not-for-profit entities eligible for a 100% remission on the RCC portion of the lost water. 2) Providing a once only opportunity for a leak remission to be replaced with a leak remission for a second leak within the 3 year period where the second leak was greater than the first leak, without affecting the 3 year period that commenced at the date of the first leak repair.
8	December 2021	<ul style="list-style-type: none"> Inclusion of 30 day period after notification for leak to be repaired. Inclusion of an appeal process by way of an Extenuating Circumstances Panel.
9	March 2022	<ul style="list-style-type: none"> Administrative update to include reference to the new Corporate Plan Updated to include link to Extenuating Circumstances application form Minor drafting changes to the provisions of the policy to more clearly achieve Council's policy intent. Updated for 2022-23 Budget Process
10	November 2022	<ul style="list-style-type: none"> Minor administrative changes for clarification clause 10 – no changes in intent.
11	March 2023	<ul style="list-style-type: none"> Updated for the 2023-24 Budget process. Administrative updates: <ul style="list-style-type: none"> Updated position title from 'Chief Financial Officer' to 'Executive Group Manager Financial Services and Chief Financial Officer' Added bullet point 11 to refer to Council's Financial Hardship Policy
12	October 2023	<ul style="list-style-type: none"> Updated to include new remission scheme from QLD State Government whereby a remission is now available on the State Bulk Water charge. Council to apply a 70% remission on the State Bulk water consumption charge of the estimated water loss, excluding eligible pensioners and not-for-profit entities who will receive a 100% remission on the State Bulk water consumption charge of the estimated water loss.
13	December 2023	<ul style="list-style-type: none"> Updated to include the amendment made for not-for-profit organisations to only be reimburse 70% rather than 100%, following the DRDMW discussions around its eligibility criteria.