



**Government
of South Australia**

A2794307

Mr Matt Cowdrey MP
Member for Colton
130 Valetta Road
FULHAM GARDENS SA 5027

Office of the
Treasurer
Level 8
State Administration Centre
200 Victoria Square
Adelaide SA 5000
GPO Box 2264
Adelaide SA 5001
DX 56203 Victoria Square
Tel 08 8226 1866
treasurer.dtf@sa.gov.au

colton@parliament.sa.gov.au

Dear Mr Cowdrey

APPLICATION UNDER THE *FREEDOM OF INFORMATION ACT 1991*

I refer to your application made under the *Freedom of Information Act 1991* (the FOI Act), dated 22 February 2023.

Your application seeks access to:

“A copy of all documents (including but not limited to hard copy or electronic briefings, minutes, reports, emails, letters (including draft versions), meeting agendas, diary entries and any other correspondence) that pertains to communication between the Office of the Treasurer and the Department of Treasury and Finance in relation to the 2024 SA Water Regulatory Determination.”

A determination on your initial application was not made within the 30-day time period required by the FOI Act. Accordingly, the Office of the Treasurer was deemed to have refused access in full to all documents relevant to your application. However, I have determined to process the request as if the statutory timeframe had been met.

An extensive search was conducted within this office, with a total of 8 documents found that fall within scope of your application.

I grant you access in full to 2 documents; copies of which are enclosed.
I grant you access in part to 3 documents; copies of which are enclosed.
I refuse you access in full to 3 documents.

Released in Part

I have granted partial access to documents 2, 5 and 7 under clause 1(1)(e) of Schedule 1 of the FOI Act.

Clause 1 – Cabinet Documents

- 1) *A document is an exempt document—*
 - (e) *if it contains matter the disclosure of which would disclose information concerning any deliberation or decision of Cabinet;*

Information has been redacted in documents 2 and 5 contain detailed information of Cabinet submission contents. Disclosure would be unreasonable as they would divulge information concerning a deliberation of Cabinet. Cabinet requires absolute candour and frankness in the confidential information presented to properly consider, deliberate and make a decision about the best option for Government.

Document 7 contain dates submissions were before Cabinet, determinations or requests for amendments from Cabinet and Cabinet Office, and detailed information of Cabinet submission contents. Disclosure would be unreasonable as they would divulge information concerning a deliberation of Cabinet. Cabinet requires absolute candour and frankness in the confidential information presented to properly consider, deliberate and make a decision about the best option for Government.

I have determined to grant partial access to documents 2, 5 and 7 pursuant to clause 1(1)(e) to the FOI Act.

I have granted partial access to documents 2 and 5 under clause 6(1) of the Schedule of the FOI Act.

Clause 6 – Documents affecting personal affairs

- 1) *A document is an exempt document— if it contains matter the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead).*

Information redacted in documents 2 and 5 refers to mobile phone numbers. Whilst the mobile numbers appear in the public servant's signature block, it is difficult to determine whether the mobile number is used solely for work purposes or mixed employment and personal use. The ability for an individual to be contacted outside of their ordinary work hours is unreasonable. Moreover, the Ombudsman has ruled that mobile numbers constitute the personal affairs of the individuals concerned¹.

Therefore, in line with the Ombudsman determination, the mobile numbers are exempt pursuant to clause 6(1) of Schedule 1 of the FOI Act.

Refused in Full

I have refused access to documents 4, 6 and 8 under clause 1(1)(e) of Schedule 1 of the FOI Act.

Clause 1 – Cabinet Documents

- 1) *A document is an exempt document—
(e) if it contains matter the disclosure of which would disclose information concerning any deliberation or decision of Cabinet;*

Documents 4 and 6 contain detailed information on the contents of a Cabinet Submission.

Document 8 is a draft Cabinet Committee Submission prepared for consideration by a Committee of Cabinet.

¹ Ombudsman Reference: 2019/01163; 2019/01165; 2019/01206; 2019/01207 [44]

Disclosure would be unreasonable as they would divulge information concerning a deliberation of Cabinet. Cabinet requires absolute candour and frankness in the confidential information presented to properly consider, deliberate and make a decision about the best option for Government.

I have therefore refused access to documents 4, 6 and 8 under clause 1(1)(e) of Schedule 1 of the FOI Act.

In accordance with Premier and Cabinet Circular PC035 – *Proactive Disclosure of Regularly Requested Information* (PC035), Ministers must proactively publish overseas travel reports to the public via departmental websites. Details of the travel will be publicly available at treasury.sa.gov.au/Our-services/proactive-disclosure, subsequent to the reconciliation of expenditure.

Please note, in compliance with Premier and Cabinet Circular PC045 - *Disclosure Logs for Non-Personal Information Released through Freedom of Information* (PC045), the Department of Treasury and Finance (DTF) is now required to publish a log of all non-personal information released under the Act.

In accordance with this Circular, any non-personal information determined for release as part of this application, may be published on the DTF website. A copy of PC045 can be found at the following address: dpc.sa.gov.au/resources-and-publications/premier-and-cabinet-circulars. Please visit the website for further information.

If you are unhappy with this determination you are entitled to apply for an internal review in accordance with section 29 of the FOI Act. To make an internal review application, please either write a letter or send Application for Review of Determination form to the Principal Officer, the Treasurer, Hon. Stephen Mullighan MP, within 30 (calendar) days after you receive this letter.

If you have any queries regarding this matter, please contact the Office of the Treasurer on (08) 8226 1866.

Yours sincerely



Elicea Tomlinson
Accredited FOI Officer
Office of the Treasurer

20 April 2023

Schedule of Documents

A2794307 - Matt Cowdrey MP - 'A copy of all documents (including but not limited to hard copy or electronic briefings, minutes, reports, emails, letters (including draft versions), meeting agendas, diary entries and any other correspondence) that pertains to communication between the Office of the Treasurer and the Department of Treasury and Finance in relation to the SA Water Regulatory Determination.'

Doc. No.	Date	Description of Document	# of pages	Determination Recommendation	Exemption Clause
1	3/01/2023	email	1	Released in full	
2	28/12/2022	Minute	5	Released in part	1(1)(e) - Contains information concerning deliberation or decision of Cabinet or Cabinet committee 6(1) - Unreasonable disclosure of personal affairs
3	4/01/2023	email	1	Released in full	
4	28/12/2022	Minute	7	Refused in full	1(1)(e) - Contains information concerning deliberation or decision of Cabinet or Cabinet committee
5	8/02/2023	Minute	5	Released in part	1(1)(e) - Contains information concerning deliberation or decision of Cabinet or Cabinet committee 6(1) - Unreasonable disclosure of personal affairs
6	13/02/2023	email	2	Refused in full	1(1)(e) - Contains information concerning deliberation or decision of Cabinet or Cabinet committee
7	10/02/2023	email	1	Released in part	1(1)(e) - Contains information concerning deliberation or decision of Cabinet or Cabinet committee
8		attachment to email	5	Refused in full	1(1)(e) - Contains information concerning deliberation or decision of Cabinet or Cabinet committee

From: [DTF:Office of the Under Treasurer](#)
To: [DTF:Treasurer Ministerial Correspondence](#)
Cc: [Pamula, Adam \(DTF\)](#); [Sharp, Martin \(DTF\)](#); [Rushworth, Aaron \(DTF\)](#)
Subject: ROUTINE - Emailing: Minute to the Treasurer - SA Water Regulatory Determination - 2024.pdf
Date: Tuesday, 3 January 2023 1:52:57 PM
Attachments: [Minute to the Treasurer - SA Water Regulatory Determination - 2024.pdf](#)

OFFICIAL

Good afternoon

Please find attached routine correspondence to the Treasurer on SA Water Regulatory Determination - 2024.

Kind regards

Ana

Ana Beveridge
Business Manager | Office of the Under Treasurer
Department of Treasury and Finance
State Administration Centre, Level 8, 200 Victoria Square ADELAIDE SA 5000
t 8226 3067 | e ana.beveridge@sa.gov.au | w treasury.sa.gov.au

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Minute to the Treasurer - SA Water Regulatory Determination - 2024.pdf

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MINUTES forming ENCLOSURE

File: T&F22/0829

Doc No: A2583626

To: The Treasurer

Endorsed: Tammie Pribanic, A/Under Treasurer

TM 30/12

SA WATER REGULATORY DETERMINATION 2024

Timing: ROUTINE — For information only

Recommendations/Issues: It is recommended that you:

- note the key processes and timeframes that will inform SA Water’s regulatory determination, commencing 1 July 2024 until 30 June 2028.

Noted

Hon. Stephen Mullighan MP
Treasurer

/ / 2023

Key Points:

Background

- Under the statutory framework governing the economic regulation of SA Water, the Essential Services Commission of South Australia (ESCOSA) makes economic regulatory determinations that set the maximum revenues that SA Water can earn from its water and sewerage retail service customers and the service standards it must deliver for its customers over a specified period. Historically the regulatory period has been for four years.
- The current regulatory period applies from 1 July 2020 until 30 June 2024 (RD20).
- ESCOSA is required to make a new regulatory determination that will apply to SA Water’s water and sewerage retail services from 1 July 2024 (RD24). Assuming a similar period of time applies to RD24 it will cover the period to 30 June 2028.
- There are a series of regulatory instruments and processes that are required to occur prior to 1 July 2024 that will assist ESCOSA and SA Water in preparing for, and finalising, RD24. These activities give you, as Treasurer, the opportunity to direct ESCOSA’s approach to regulating SA Water. They also provide the Minister for Climate,

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Environment and Water (and the Government more generally) with the ability to direct SA Water's operating and investing activities.

- Relevant processes and an indicative timeframe are outlined below (a detailed timeline is also provided at Appendix A).

Upcoming processes

SA Water's regulatory business plan

- SA Water is required to submit to ESCOSA a regulatory business plan (RBP) for RD24. The RBP will provide a detailed analysis of the program of works required over the period to deliver SA Water's plan for customers.
- SA Water's RBP will also provide an indicative outline of the potential price outcomes for SA Water customers and returns to government.
- The proposed expenditures and service outcomes contained in the RBP will be reviewed by ESCOSA (including via a public consultation process). Where proposed expenditures are considered prudent and efficient, they will be included in ESCOSA's draft determination which is released for public consultation.

1(1)(e) Disclose deliberation of Cabinet



RD24 Pricing Order

- Section 35(4) of the *Water Industry Act 2012* (the Act), provides that the Treasurer may issue a Pricing Order to ESCOSA.
- The Pricing Order provides clarity to ESCOSA and SA Water on the principles, policies, parameters, factors, or other matters to apply in ESCOSA's regulatory determination of SA Water. Key aspects covered in the pricing order include the period of time the determination is to apply, what services the determination is to apply to, the need to apply National Water Initiative pricing principles, the application of revenue controls and how costs SA Water incurs implementing a direction by its Minister are to be funded.
- While the Act does not specify when the pricing order must be made, other than a requirement that the pricing order be made prior to ESCOSA completing its determination, it is generally issued at the start of the process. For RD24 this would be around May 2023.
- A further pricing order may be issued to vary this pricing order in response to matters raised by ESCOSA in its Draft Determination or subsequently by the government.
- The Department of Treasury and Finance has begun initial consultation with SA Water, ESCOSA and the Crown Solicitor's Office on a draft pricing order for your consideration. DTF will engage with your office early in the new year to ensure the Pricing Order includes any additional aspects you might wish to include.

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Water Industry licence fees

- Water Industry licence fees recover government costs related to water industry regulation.
- Section 24(3) of the Act requires the Treasurer to set licence fees at an amount considered to be a reasonable contribution towards the government's regulatory costs after considering advice by ESCOSA.
- The fees are paid by any entity or person providing a water or sewerage "retail service" in South Australia. SA Water's fee comprises around 96 per cent of the total revenue raised from the fees. Typically, water industry licence holders recover the cost of the licence fee from customers. Given the majority of the fee is paid by SA Water, the setting of licence fees is set to align with SA Water's regulatory period.
- The Act does not specify a date by which the Treasurer is required to set licence fees, however it would be advantageous to set the fees no later than end May 2024 to allow time to inform licence holders and to publish the new fees on the Department of Treasury and Finance website prior to 1 July 2024.

1(1)(e) Disclose deliberation of Cabinet



Ministerial Direction

- Section 6 of the *Public Corporations Act 1993* and sections 6 and 7(2)(f) of the *South Australian Water Corporation Act 1994*, clarify that SA Water is subject to control and direction by its Minister.
- Prior to the commencement of regulatory period the Minister issues a Direction to SA Water. The Direction directs SA Water (and provides clarity to ESCOSA) on the Government's policies and non-commercial activities which SA Water is to undertake during the regulatory period. These activities currently include:
 - Emergency management services
 - Government radio network services
 - Fluoridation services
 - Purchase of renewable energy or carbon offsets for the Adelaide Desalination Plant.
 - State-wide pricing facility
 - Water planning and management charges contribution
 - Annual reimbursement of fees paid for valuation roll.

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- Typically, DTF has taken the lead in drafting the direction for the Minister's signature reflecting that the direction has financial implications that ESCOSA must include in its Final Determination (i.e., recovery of certain costs, payment of Community Service Obligations etc).
- Ideally the Direction would be issued at the commencement of the regulatory determination process to allow SA Water to take this into consideration in its RBP, however, for RD20 the Direction was not approved until May 2020.
- Subject to your endorsement, the draft direction will be forwarded to the Minister for her endorsement and signature around December 2023.
- More information on the timeline for the regulatory determination process is provided in Appendix 1.



Tricia Blight
EXECUTIVE DIRECTOR
BUDGET AND PERFORMANCE

28/11/2023

Contact Officer:	Adam Pamula
Telephone:	Clause 6(1)
Email address:	Adam.Pamula@sa.gov.au

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Appendix 1

- The table below sets the estimated key dates for the regulatory determination commencing 1 July 2024.

Date	Author	Activity
May 2023	Treasurer	Pricing Order published
July 2023	SA Water	Regulatory business proposal submitted to ESCOSA
July 2023	Treasurer	Water industry licence fee process considered by Cabinet
July 2023	Treasurer	ESCOSA advice sought on costs to be recovered from water industry licence fees
October 2023	ESCOSA	Advice provided on costs to be recovered from water industry licence fees
November 2023	ESCOSA	Draft Determination released
December 2023	Treasurer	Water industry licence fees published
December 2023	Treasurer	Approve Section 6 Direction to SA Water
May 2024	ESCOSA	Final Determination released
June 2024	SA Water	Water and sewerage Prices determined
1 July 2024	-	SA Water Regulatory Determination for 2024-2028 commences

From: [DTF:BAP Admin](#)
To: [DTF:Treasurer Ministerial Correspondence](#)
Cc: [Raymond, Greg \(DTF\)](#); [Persse, Rick \(DTF\)](#); [Blaskett, Andrew \(DTF\)](#); [Pamula, Adam \(DTF\)](#)
Subject: A2681236 - SA WATER REGULATORY PERIOD 2024-28 – CAPITAL PROGRAM
Date: Wednesday, 4 January 2023 9:31:27 AM
Attachments: [A2681236 - SA WATER REGULATORY PERIOD 2024-28 – CAPITAL PROGRAM.pdf](#)
[image001.jpg](#)

OFFICIAL: Sensitive

Good morning

Please see the attached document regarding “A2681236 - SA WATER REGULATORY PERIOD 2024-28 – CAPITAL PROGRAM” for the Treasurer’s consideration.

Thank you.

Kind regards



Helen

Helen Lardner

Budget and Performance Branch | Department of Treasury and Finance

t 08 8429 4215 | e helen.lardner@sa.gov.au | w treasury.sa.gov.au

State Administration Centre, Level 7, 200 Victoria Square ADELAIDE SA 5000

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Government of South Australia
Department of Treasury
and Finance

MINUTES forming ENCLOSURE

File: T&F22/0829

Doc No: A2583626

To: The Treasurer

Endorsed: Tammie Pribanic, A/Under Treasurer

MINISTER'S OFFICE	
Rec'd	3-1-23
File No.	7231617
Phys:	30/12

SA WATER REGULATORY DETERMINATION 2024

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8 / 2 / 2023

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- Typically, DTF has taken the lead in drafting the direction for the Minister's signature reflecting that the direction has financial implications that ESCOSA must include in its Final Determination (i.e., recovery of certain costs, payment of Community Service Obligations etc).
- Ideally the Direction would be issued at the commencement of the regulatory determination process to allow SA Water to take this into consideration in its RBP, however, for RD20 the Direction was not approved until May 2020.
- Subject to your endorsement, the draft direction will be forwarded to the Minister for her endorsement and signature around December 2023.
- More information on the timeline for the regulatory determination process is provided in Appendix 1.



Tricia Blight
**EXECUTIVE DIRECTOR
BUDGET AND PERFORMANCE**

28/12/2023

Contact Officer:	Adam Pamula
Telephone:	Clause 6(1)
Email address:	Adam.Pamula@sa.gov.au

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Appendix 1

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1 July 2024	-	SA Water Regulatory Determination for 2024-2028 commences

Tonkin, Kate (DTF)

From: DTF:Treasurer Ministerial Correspondence
Sent: [REDACTED]
To: Vernocchi, Alanah (DTF)
Subject: FW: BCC Note - SA Water Capital Program - RD24
Attachments: BCC Note - SA Water Capital Program - RD24.docx

From: Alexandropoulos, Pantelis (DTF) <Pantelis.Alexandropoulos@sa.gov.au>
Sent: [REDACTED]
To: DTF:Treasurer Ministerial Correspondence <DTFTreasurerMinisterialCorrespondence@sa.gov.au>; Atkinson, John (DTF) <John.Atkinson@sa.gov.au>; Leyson, Matthew (DTF) <Matthew.Leyson@sa.gov.au>
Cc: Blight, Tricia (DTF) <Tricia.Blight@sa.gov.au>; Persse, Rick (DTF) <Rick.Persse@sa.gov.au>; Pribanic, Tammie (DTF) <tammie.pribanic@sa.gov.au>; Sharp, Martin (DTF) <Martin.Sharp@sa.gov.au>; Pamula, Adam (DTF) <Adam.Pamula@sa.gov.au>; Lardner, Helen (DTF) <Helen.Lardner@sa.gov.au>; Penov, Jasminka (DTF) <Jasminka.Penov@sa.gov.au>
Subject: BCC Note - SA Water Capital Program - RD24

OFFICIAL: Sensitive

Good afternoon,

Please see the attached BCC Note "SA Water Capital Program - RD24", for the Treasurer's consideration.

Kind regards

Pantelis Alexandropoulos

Budget Process and Production Coordinator

Budget & Performance Branch

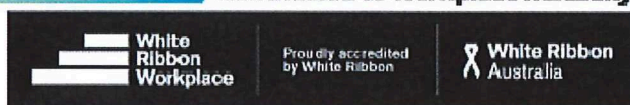
State Administration Centre, Level 7, 200 Victoria Square ADELAIDE SA 5000

t 8429 2412 | e pantelis.alexandropoulos@sa.gov.au | w treasury.sa.gov.au

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Government of South Australia
Department of Treasury
and Finance



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