

Email address	[REDACTED]
Contact Details	
Name of respondent	Brendan Guiney1
Postcode	2060
Contact phone number	[REDACTED]
Email	[REDACTED]
Are you an individual or representing an organisation?	Organisation
Organisation or Business Details	
Name of Organisation	NSW Water Directorate
Who are you representing?	Peak representative organisation
Proposed changes to recording and reporting requirements	
The draft public exhibition regulation includes proposed changes to the recording and reporting mandatory conditions. Do you have any comments on the recording and reporting requirements?	Yes
If yes, please include your comment below and indicate whether it relates to works	C. required to have a meter, data logger and telemetry - clause 244 of the regulations
Please provide your comments on the proposed recording and reporting requirements	Local water utilities already have extensive SCADA and telemetry systems. The proposed requirements represent a duplication of current local water utility regulation and reporting to other state agencies. In addition, the telemetry requirement could present a cybersecurity risk by creating additional lower security access points to local water utility systems.
Draft public exhibition regulation	
Do you have any other	

comments on the draft public exhibition regulation? Yes

If yes, please provide your comments.

Local Water Utilities are already accountable to state agencies for water performance measurement. The approach with Duly Qualified Persons also adds an unnecessary burden on Local Water Utilities, which already have a satisfactory system in place for operating, maintaining and calibrating water meters. Local Water Utilities have significant commitments to safe, secure drinking water. The SCADA and telemetry requirements have the potential to introduce cybersecurity vulnerabilities unless carefully risk assessed.