

**IN THE MATTER OF THE INQUIRIES ACT 2014 (VIC)**

**AND IN THE MATTER OF A BOARD OF INQUIRY  
INTO THE MCCRAE LANDSLIDE**

**ENTITY: SERVICE STREAM LIMITED**

**SECOND WITNESS STATEMENT OF  
DAVID LINDSAY ZROPF**

**A Introduction**

- 1 My full name is David Lindsay Zropf.
- 2 I am the Accountable Executive responsible for the Utilities Division at Service Stream Limited.
- 3 This is the second witness statement I have provided to the Board. I previously provided a witness statement which was dated 2 June 2025 (**First Statement**).
- 4 Unless I note otherwise, where terms are capitalised, they have the same meaning as defined in my First Statement.
- 5 I have reviewed the letter from Ms Georgie Austin dated 10 June 2025, which enclosed an amended second list of questions for Service Stream Limited. I respond to those questions in this statement.

**B Question 1**

**For the period 1 October 2024 to 14 January 2025 (inclusive), describe the steps Service Stream took in response to each task related to any of the following: i. Leak detection; ii. Repair of leaks and/or burst water mains; or iii. Diversion or removal of excess water in sewer tranches, that was “awarded” or “assigned” to it by SEW under the Original Program 1 Contract in the McCrae Landslide Area, and when it took each step.**

**Your answer should include:**

- a. any correspondence with SEW;**
- b. when Service Stream first became aware of the task;**
- c. how Service Stream triaged/prioritised the task, and whether SEW instructed Service Stream to prioritise the task;**
- d. how Service Stream performed the task, including details as to which Service Stream field worker attended the site, observations made at the site, and what (if any) repairs were effected; and**
- e. whether Service Stream engaged third party assistance to resolve the task and, if so, the type of assistance.**

**As part of your answer, exhibit key documents demonstrating these steps. For example, relevant exhibits might include the relevant report completed in Montage, draft notes and /or photos.**

- 6 I described how SEW assigns tasks to Service Stream under the Original Program 1 Contract in my First Statement (at paragraphs [23]-[25]). As I noted, SEW uses the “Montage” platform. Montage is an online application that SEW operates, but which both SEW and Service Stream can access.

#### About Montage

- 7 Montage gives both SEW and Service Stream the ability to record notes about each task. Based on discussions with members of my team, I understand that the primary way that SEW and Service Stream communicate in writing about a task is by

updating the Montage notes (referred to as “Job Comments” in Montage) for that task. Amongst other things, Montage also allows Service Stream representatives to upload documents, photographs and other records, where they are relevant to a task.

- 8 Each individual Montage task is given a unique number (in the format #####/00#). Each task can only hold so much data. Therefore, from time to time, a new task will be created for additional notes, photos or other artefacts attached to a task. Where this occurs, the subsequent records may be labelled with the same task number, but with an escalating sequential three digit extension (i.e. /002, /003, /004 etc). Alternatively, a sequential three digit extension (i.e. /002, /003) might be used to link a separate task which occurs at the same location (and close in time) to a previous task (rather than assigning the task an entirely new number).
- 9 When considering next steps about a task, including whether to close a task, SEW can see all the comments that have been made by Service Stream’s workers for that task, as well as any documents or other artefacts that have been uploaded.
- 10 It is possible that representatives of Service Stream and SEW may from time to time communicate outside of Montage about certain tasks. However, I understand from my team that typically correspondence about each task is exchanged with SEW using Montage. My answers to the Board’s questions below are only based on extracts that have been obtained from the Montage system, which (as I note above) is the usual means of written communication between SEW and Service Stream.

#### Approach to answering the Board’s Question 1

- 11 In response to the Board’s amended list of questions (dated 10 June 2025), I asked members of Service Stream’s Utilities Division to interrogate Montage to identify tasks that were recorded as having been allocated to Service Stream with a task creation date between 1 October 2024 to 14 January 2025 (inclusive).
- 12 The resulting list was then reviewed to identify the tasks that answered the description in the question (based on the task description as it appears in Montage). The team manually downloaded the available notes for each relevant task, as well as relevant photographs and artefacts.

- 13 In the paragraphs below, I discuss each task that has been identified as a result of this process as being responsive to the Board's Question 1.
- 14 As described above, my team has downloaded the notes for each responsive task from the Montage system and saved them as a word document. Each word document has been given a unique document number in accordance with the Board's document production guidelines.
- 15 These notes describe the steps that Service Stream's representatives have recorded as having taken in response to each task, including containing records of:

**(a) correspondence with SEW:**

Correspondence between SEW and Service Stream is typically recorded in the "Job Comments" section of the notes for each task.

**(b) when Service Stream first became aware of the task:**

I understand this is recorded as the date and time the task is "Awarded" or "Assigned" to Service Stream in the "Job Comments" section. In some relevant tasks, no date of assignment or award is recorded, so I assume that the creation date of the tasks was the relevant date for this purpose.

**(c) how Service Stream triaged/prioritised the task, and whether SEW instructed Service Stream to prioritise the task:**

Priority of tasks is recorded in the "Priority" rating located near the top of each task record. These values have been assigned by SEW. As I noted at paragraphs [23]-[25] of my First Statement, Service Stream prioritises the tasks it receives based on the rating assigned by SEW.

At paragraph [23] of my First Statement, I referred to a 1-5 priority rating system that SEW will use in certain circumstances. I understand that this 1-5 scale reflects prioritisation used in the context of Essential Services Commission (**ESC**) regulated water assets. However, in Montage, SEW uses a different (internal) prioritisation scale when assigning tasks to Service Stream. This prioritisation scale is between 1-10, with 1 being for tasks that

SEW has assigned the highest priority. SEW does not use the ESC scale in Montage.

- (d) **how Service Stream performed the task, including details as to which Service Stream field worker attended the site, observations made at the site, and what (if any) repairs were effected:**

The Job Comments section of the notes record actions undertaken and observations made.

Some tasks include the names of workers recorded as being “onsite” (these may be Service Stream workers or SEW workers). Other names are recorded as being responsible for specific comments. In several tasks, comments are recorded as having been entered by “FT” (with a “SSF” number following). I understand that this is an acronym for “Field Terminal” and that the SSF number is the Service Stream field terminal used to enter the comment (in other words, these are the laptops used by individual Service Stream workers to log information).

- (e) **whether Service Stream engaged third party assistance to resolve the task and, if so, the type of assistance:**

I understand that any third party assistance will be recorded in the Job Comments section, where applicable.

- 16 Given all these matters are recorded in the extract from Montage identified as below as corresponding to each task, and given the time available, I have not repeated all the specific details contained in the Montage notes in this statement in order to avoid complicating the Board’s review. Reference should be made to the Montage extracts which are identified as corresponding to each task.

Task No 1276255/001

- 17 The extract obtained from Montage for this task is **SST.0002.0001.0022**.
- 18 That extract notes that:

- (a) On 5 October 2024 SEW assigned Service Stream this task, which was at 703 Point Nepean Road, McCrae VIC 3938.
  - (b) The request type was noted as "*Water Network - Water Main - Repair of leak in roadway*", with the initial comments (which would have been provided by SEW) that "*water main lekaing [sic] from road, tap on full pressure, no access [sic] issues no animals TM will be required, tar is holding up at this stage*".
  - (c) SEW assigned a priority level 5 to this task.
- 19 The photos attached to this task which have been extracted from Montage are  
**SST.0002.0001.0023; SST.0002.0001.0024; SST.0002.0001.0025;  
 SST.0002.0001.0026; SST.0002.0001.0027; SST.0002.0001.0028;  
 SST.0002.0001.0029; SST.0002.0001.0030; SST.0002.0001.0031;  
 SST.0002.0001.0032; SST.0002.0001.0033; SST.0002.0001.0034;  
 SST.0002.0001.0035; SST.0002.0001.0036; SST.0002.0001.0037;  
 SST.0002.0001.0038; SST.0002.0001.0039; SST.0002.0001.0040;  
 SST.0002.0001.0041; SST.0002.0001.0042; SST.0002.0001.0043;  
 SST.0002.0001.0044; SST.0002.0001.0045; SST.0002.0001.0046;  
 SST.0002.0001.0047; SST.0002.0001.0048; SST.0002.0001.0049;  
 SST.0002.0001.0050; SST.0002.0001.0051; SST.0002.0001.0052;  
 SST.0002.0001.0053; SST.0002.0001.0054; SST.0002.0001.0055;  
 SST.0002.0001.0056; SST.0002.0001.0057; SST.0002.0001.0058;  
 SST.0002.0001.0059; SST.0002.0001.0060; SST.0002.0001.0061;  
 SST.0002.0001.0062; SST.0002.0001.0063; SST.0002.0001.0064;  
 SST.0002.0001.0065; SST.0002.0001.0066; SST.0002.0001.0067;  
 SST.0002.0001.0068; SST.0002.0001.0069; SST.0002.0001.0070;  
 SST.0002.0001.0071.**
- 20 I note that a second, related task which is numbered 1276255/002 was also created. However, I understand that all files from this second task have been transferred to the primary task entry for 1276255/001. As such, there are no separate notes or records to produce in response to task 1276255/002.

Task No 1281290/001

- 21 The extract obtained from Montage for this task is **SST.0002.0001.0079**.
- 22 That extract records that:
- (a) On 25 October 2024 SEW assigned Service Stream this task at 43 Bayview Road, McCrae VIC 3938.
  - (b) The request type was noted as "*Water Network - Service Pipe - Repair of leak*", with initial comments that "*Customer called to advse [sic] small leak on service pipe going into the meter access ok no dogs*".
  - (c) SEW assigned a priority level 7 to this task.
- 23 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0080; SST.0002.0001.0081**.

Task No 1289514/001

- 24 The extract obtained from Montage for this task is **SST.0002.0001.0084**.
- 25 That extract notes that:
- (a) On 26 November 2024 Service Stream was awarded this task at 9-11 View Point Road, McCrae VIC 3938.
  - (b) The request type was noted as "*Water Network - Water Main - Repair of leak in other location*", with the initial comments that "*house is way below road level, please check water main and service pipe due to customer experiencing water leaking down through backyard retaining wall. Council has checked their assets, and customer is not experiencing high usage so believes it's not internal. access to property through Nepean HWY Clear access No animals*".
  - (c) SEW assigned a priority level 5 to this task.

- 26 The photos attached to this task which have been extracted from Montage are  
**SST.0002.0001.0085; SST.0002.0001.0086; SST.0002.0001.0087;**  
**SST.0002.0001.0088; SST.0002.0001.0089; SST.0002.0001.0090;**  
**SST.0002.0001.0091; SST.0002.0001.0092; SST.0002.0001.0093;**  
**SST.0002.0001.0094; SST.0002.0001.0095.**

Task No 1290137/001

- 27 The extract obtained from Montage for this task is **SST.0002.0001.0098.**
- 28 That extract notes that:
- (a) On 28 November 2024 SEW awarded Service Stream this task at 1 Charlesworth Street, McCrae VIC 3938.
  - (b) The request type was noted as “*Water Network - Water Main - Repair of leak in roadway*”, with the initial comments that “[*Customer*] lives further down the st [*sic*] and has noticed that there is water leaking from the road, approx hose on half, flowing into gutter. She thinks that a crew may have been doing some sort of work in the area and after they have left she noticed the leak. unclear on who it may have been or what works were done.”
  - (c) SEW assigned a priority level 5 to this task.

- 29 The photos attached to this task which have been extracted from Montage are  
**SST.0002.0001.0099; SST.0002.0001.0100; SST.0002.0001.0101;**  
**SST.0002.0001.0102; SST.0002.0001.0103; SST.0002.0001.0104;**  
**SST.0002.0001.0105.**

Task No 1290137/002

- 30 The extract obtained from Montage for this task is **SST.0002.0001.0108.**
- 31 That extract notes that:
- (d) On 1 December 2024, SEW allocated Service Stream this task at 1 Charlesworth Street, McCrae VIC 3938. It appears that as this task relates

to the same premises as 1290137/001, and occurred a few days later, it was opened as a related task /002.

(a) The request type was noted as “*Water Network - Water Main - Repair of leak in roadway*”, with the initial comments that “*water bubbling through roadway oat [sic] intersection of Waller Place and Charlesworth - easy to spot - recently patched roadwaork [sic] is bubbling and lifting - access ok reported by [Customer name]*”.

(b) SEW assigned a priority level 5 to this task.

32 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0109; SST.0002.0001.0110; SST.0002.0001.0111; SST.0002.0001.0112; SST.0002.0001.0113.**

Task No 1295094/001

33 The extract obtained from Montage for this task is **SST.0002.0001.0122.**

34 That extract notes that:

(a) On 16 December 2024, SEW assigned Service Stream this task at 4 Waller Place, McCrae VIC 3938.

(a) The request type was noted as “*Water Network - Water Main - Repair of leak in nature strip*”, with the initial comments that “*sss advised water is leaking on the nature strip and trickling into the gutter (Snap Send Solve)*”

(a) SEW assigned a priority level 5 to this task.

35 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0123; SST.0002.0001.0124; SST.0002.0001.0125; SST.0002.0001.0126.**

Task No 1295094/002

36 The extract obtained from Montage for this task is **SST.0002.0001.0129**.

37 That extract notes that:

- (a) On 17 December 2024, SEW awarded Service Stream this task at 4 Waller Place, McCrae VIC 3938. This task is second in sequence to 1295094/001. It appears to have been opened as a subsequent task (as opposed to having an entirely new number) given the same premises were involved.
- (b) The request type was noted as "*Water Network - General - Red Notice Inspection*" (Red Notices are notices provided to customers where a leak is indicated to be due to their own plumbing or pipes (as opposed to SEW's), and that the customer should organise repairs), with the initial comments that "*got a call from a neighbour following up on this one, saying she can see water bubbling up from the ground and running into the gutter n/s is very soft and ground is water logged please reattend and assess whether they may be a leak from elsewhere, as customer is adamant that it's more than seepage*".
- (b) SEW assigned a priority level 7 to this task.

38 The photo attached to this task which has been extracted from Montage is **SST.0002.0001.0130**.

Task No 1295094/003

39 The extract obtained from Montage for this task is **SST.0002.0001.0133**.

40 That extract notes that:

- (a) On 21 December 2024, SEW allocated Service Stream this task at 4 Waller Place, McCrae VIC 3938. This task is third in sequence to 1295094/001.
- (b) The request type was noted as "*Water Network - General - Red Notice Inspection*", with initial comments which appear to be a duplicate of the final Job Comments recorded on 1295094/002. As such, I understand that this

task is actually a continuation of 1295094/002 (rather than a new task), and has been created to allow more storage space for notes and artefacts: see paragraph [8] above.

(c) SEW assigned a priority level 5 to this task.

- 41 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0134; SST.0002.0001.0135; SST.0002.0001.0136; SST.0002.0001.0137; SST.0002.0001.0138; SST.0002.0001.0139; SST.0002.0001.0140; SST.0002.0001.0141; SST.0002.0001.0142; SST.0002.0001.0143.**
- 42 A third-party specialised leak services report associated with this task which has been extracted from Montage is **SST.0002.0001.0144.**

Task No 1295094/004

- 43 The extract obtained from Montage for this task is **SST.0002.0001.0148.**
- 44 The extract records a note that this task is a duplicate of 1295094/003.
- 45 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0149; SST.0002.0001.0150; SST.0002.0001.0151; SST.0002.0001.0152; SST.0002.0001.0153; SST.0002.0001.0154; SST.0002.0001.0155; SST.0002.0001.0156; SST.0002.0001.0157; SST.0002.0001.0158.**

Task No 1295094/005

- 46 The extract obtained from Montage for this task is **SST.0002.0001.0159.**
- 47 That extract appears to be a substantial duplicate of 1295094/003.
- 48 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0149; SST.0002.0001.0150; SST.0002.0001.0151; SST.0002.0001.0152; SST.0002.0001.0153; SST.0002.0001.0154;**

**SST.0002.0001.0158; SST.0002.0001.0160; SST.0002.0001.0161;  
SST.0002.0001.0162; SST.0002.0001.0164.**

- 49 A third-party specialised leak services report associated with this task which has been extracted from Montage is **SST.0002.0001.0163**.

Task No 1295094/006

- 50 The extract obtained from Montage for this task is **SST.0002.0001.0166**.

- 51 That extract notes that:

- (a) On 30 December 2024, SEW created this task. The Montage extract does not specify an address associated with this task.
- (b) The request type was noted as "*Water Network - Water Main - Repair of burst in other location*", with initial comments "*Burst on the 150UPVC main opp 2 the boulevard. water Ops located leak*". It appears that this task is a continuation of, or related to, 1295094/003.
- (c) SEW assigned a priority level 5 to this task.

- 52 The photos attached to this task which have been extracted from Montage are

**SST.0002.0001.0167; SST.0002.0001.0168; SST.0002.0001.0169;  
SST.0002.0001.0170; SST.0002.0001.0171; SST.0002.0001.0172;  
SST.0002.0001.0173; SST.0002.0001.0174; SST.0002.0001.0175;  
SST.0002.0001.0176; SST.0002.0001.0177; SST.0002.0001.0178;  
SST.0002.0001.0179; SST.0002.0001.0180; SST.0002.0001.0181;  
SST.0002.0001.0182; SST.0002.0001.0183; SST.0002.0001.0184;  
SST.0002.0001.0185; SST.0002.0001.0186; SST.0002.0001.0187;  
SST.0002.0001.0188; SST.0002.0001.0189; SST.0002.0001.0190;  
SST.0002.0001.0191; SST.0002.0001.0192.**

Task No 1295094/007

- 53 The extract obtained from Montage for this task is **SST.0002.0001.0195**.
- 54 That extract notes that:
- (a) On 2 January 2025, SEW created this task at 4 Waller Place, McCrae VIC 3938.
  - (b) The request type was noted as "*Water Network - Leak Detection - Investigation*", with initial comments "*Wall, As discussed, please continue with the LEAK investigations, checking any SEW asset in the area. Note samples returned positive result for storm water pit. Questionable on road leaks*". It appears that this task is a continuation of, or related to, 1295094/006. It also includes details of activities that were undertaken after the McCrae Landslide on 14 January 2025.
  - (c) SEW assigned a priority level 10 to this task.
- 55 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0152; SST.0002.0001.0153; SST.0002.0001.0156; SST.0002.0001.0157; SST.0002.0001.0160; SST.0002.0001.0162; SST.0002.0001.0196; SST.0002.0001.0197; SST.0002.0001.0198; SST.0002.0001.0199; SST.0002.0001.0200; SST.0002.0001.0201; SST.0002.0001.0202; SST.0002.0001.0203; SST.0002.0001.0204; SST.0002.0001.0205; SST.0002.0001.0206; SST.0002.0001.0207; SST.0002.0001.0208; SST.0002.0001.0209; SST.0002.0001.0210; SST.0002.0001.0211; SST.0002.0001.0212; SST.0002.0001.0213; SST.0002.0001.0214; SST.0002.0001.0215; SST.0002.0001.0216; SST.0002.0001.0217; SST.0002.0001.0218; SST.0002.0001.0219; SST.0002.0001.0220; SST.0002.0001.0221; SST.0002.0001.0222; SST.0002.0001.0223; SST.0002.0001.0224; SST.0002.0001.0225; SST.0002.0001.0226; SST.0002.0001.0227; SST.0002.0001.0228; SST.0002.0001.0230; SST.0002.0001.0231; SST.0002.0001.0232; SST.0002.0001.0233**.

- 56 A third-party water sample report associated with this task which has been extracted from Montage is **SST.0002.0001.0229**.

Task No 1295097/001

- 57 The extract obtained from Montage for this task is **SST.0002.0001.0235**.
- 58 That extract notes that:
- (a) On 16 December 2024 SEW awarded Service Stream this task at 34 Coburn Avenue, McCrae VIC 3938.
  - (b) The request type was noted as “*Water Network - Water Main - Repair of leak in nature strip*”, with the initial comments that “*sss adved [sic] water is leaking in the nature strip slow trickle case*”.
  - (c) SEW assigned a priority level 5 to this task.
- 59 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0236; SST.0002.0001.0237; SST.0002.0001.0238; SST.0002.0001.0239**.

Task No 1299369/001

- 60 The extract obtained from Montage for this task is **SST.0002.0001.0250**.
- 61 That extract notes that:
- (a) On 4 January 2025 SEW awarded Service Stream this task at 35 Beverly Road, McCrae VIC 3938.
  - (b) The request type was noted as “*Water Network – Meter – Repair of Leak*”, with initial comments that “*[s]top tap at meter on 35 Beverly Road, McCrae is leaking*”.
  - (c) SEW assigned a priority level 7 to this task.
- 62 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0251**.

Task No 1298016/001

- 63 The extract obtained from Montage for this task is **SST.0002.0001.0242**.
- 64 That extract notes that:
- (a) On 29 December 2024 SEW awarded Service Stream this task at 32 Coburn Avenue, McCrae VIC 3938. The extract indicates that this task was initially awarded to another provider, before being re-allocated to Service Stream.
  - (b) The request type was noted as "*Water Network - Water Main - Repair of leak in nature strip*", with the initial comments that "*water main leakng [sic] in the ns, not alot [sic] of water*".
  - (c) SEW assigned a priority level 5 to this task.
- 65 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0243; SST.0002.0001.0244; SST.0002.0001.0245; SST.0002.0001.0246; SST.0002.0001.0247**.

Task No 1299522/001

- 66 The extract obtained from Montage for this task is **SST.0002.0001.0254**.
- 67 That extract notes that:
- (a) On 5 January 2025 SEW awarded Service Stream this task at 3 Penny Lane, McCrae VIC 3938.
  - (b) The request type was noted as "*Water Network - Water Main - Repair of leak in nature strip*", with the initial comments that "*SES advised leak large leak [sic] to rear of No 10 and the meter wasn't ticking over so said there is water running down from Viewpoint Road to the back of 10 which has caused a landslip to 3 Penny Lane. SES trying to find cause of leak and location of leak. Coming from the higher side of this address. They can hear water from the fireplug at no 10 in View point Rd.*"
  - (c) SEW assigned a priority level 1 to this task.

- 68 The photos attached to this task which have been extracted from Montage are  
**SST.0002.0001.0255; SST.0002.0001.0256; SST.0002.0001.0257;**  
**SST.0002.0001.0258; SST.0002.0001.0259; SST.0002.0001.0260;**  
**SST.0002.0001.0261; SST.0002.0001.0262; SST.0002.0001.0263;**  
**SST.0002.0001.0264; SST.0002.0001.0265; SST.0002.0001.0266;**  
**SST.0002.0001.0267; SST.0002.0001.0268; SST.0002.0001.0269;**  
**SST.0002.0001.0270; SST.0002.0001.0271; SST.0002.0001.0272;**  
**SST.0002.0001.0273; SST.0002.0001.0274; SST.0002.0001.0275;**  
**SST.0002.0001.0276; SST.0002.0001.0277; SST.0002.0001.0278.**

Task No 1299557/001

- 69 The extract obtained from Montage for this task is **SST.0002.0001.0288.**
- 70 That extract notes that:
- (a) On 6 January 2025 SEW created this task at 29 Bayview Road, McCrae VIC 3938.
  - (b) The request type was noted as *“Water Network - Water Main - Repair of leak in driveway”*, with the initial comments that *“Suggest having a vac truck onsite to expose main and minimize damage to property where water is pushing up In [sic] nature strip. There's also water showing on driveway as well but suggest trying ro [sic] expose the main etherised [sic] of driveway first to try and locate the main/leak before digging up driveway. Also unsure where the main runs exactly.”*
  - (c) SEW assigned a priority level 10 to this task.
- 71 The photos attached to this task which have been extracted from Montage are  
**SST.0002.0001.0289; SST.0002.0001.0290; SST.0002.0001.0291;**  
**SST.0002.0001.0292; SST.0002.0001.0293; SST.0002.0001.0294;**  
**SST.0002.0001.0295; SST.0002.0001.0296; SST.0002.0001.0297;**  
**SST.0002.0001.0298; SST.0002.0001.0299; SST.0002.0001.0300;**  
**SST.0002.0001.0301; SST.0002.0001.0302; SST.0002.0001.0303;**  
**SST.0002.0001.0304; SST.0002.0001.0305; SST.0002.0001.0306;**

**SST.0002.0001.0307; SST.0002.0001.0308; SST.0002.0001.0309;  
 SST.0002.0001.0310; SST.0002.0001.0311; SST.0002.0001.0312;  
 SST.0002.0001.0313; SST.0002.0001.0314; SST.0002.0001.0315;  
 SST.0002.0001.0316; SST.0002.0001.0317; SST.0002.0001.0318;  
 SST.0002.0001.0319..**

Task No 1299529/001

72 The extract obtained from Montage for this task is **SST.0002.0001.0281**.

73 That extract notes that:

- (a) On 5 January 2025 SEW awarded Service Stream this task at 3 Penny Lane, McCrae VIC 3938.
- (b) The request type was noted as “*Sewer Network - Sewer Pipe - Unblock*”, with the initial comments that “*possible retic stoppage SS crew on site and has advised -430662 retic stoppage in upstream line-ec pen 651 testing please check manhole also .SES on site road has collapsed in 2 places and landslide to property.*”
- (c) SEW assigned a priority level 1 to this task.

74 The photos attached to this task which have been extracted from Montage are **SST.0002.0001.0282; SST.0002.0001.0283; SST.0002.0001.0284;  
 SST.0002.0001.0285.**

Task No 94325/005

75 The extract obtained from Montage for this task is **SST.0002.0002.0012**.

76 That extract notes that:

- (a) On 4 December 2025, SEW created this task, which was at 20 The Eyrie, McCrae VIC 3938.
- (b) It was described as “*Sewer Network – Creek Crossing – Inspection*”. The initial comments were “*Please carry out creek crossing [sic] inspection as per*

*SI. Attach required photos and add comments for any issues or defects not covered in the SI form”.*

(c) SEW assigned a priority level 10 to this task.

- 77 The photos attached to this task which have been extracted from Montage are  
**SST.0002.0002.0002; SST.0002.0002.0003; SST.0002.0002.0004;**  
**SST.0002.0002.0005; SST.0002.0002.0006; SST.0002.0002.0007;**  
**SST.0002.0002.0008; SST.0002.0002.0009; SST.0002.0002.0010;**  
**SST.0002.0002.0011.**

## **E Question 2**

**Did Service Stream's actions in connection with each task described in answer to question 1 above conform with its ordinary practices and procedures?**

- 78 As set out in paragraph [19] of my First Statement, the Original Program 1 Contract requires Service Stream to comply with SEW's policies and procedures and maintain its own policies and procedures to the satisfaction of SEW.
- 79 I have generally reviewed the actions (as recorded in the Montage notes) taken in connection with each of the tasks described in answer to Question 1 above and am not aware of any departure from the applicable or ordinary practices and procedures.

## **F Question 3**

**Describe how sounding/listening sticks are used by Service Stream to locate and identify leaks.**

- 80 Manual sounding or listening sticks are used by Service Stream workers to help locate leaks. I understand that they are widely used for leak detection in the water industry. They are typically used in conjunction with visual inspections of potential leaks and water assets to identify likely leak locations.
- 81 Through practical experience, Service Stream workers learn to use sounding sticks to listen for certain sounds that are indicative of flows of water consistent with a leak in a water main.

- 82 Sounding sticks work by amplifying acoustic vibrations, including those that would be generated by water escaping under pressure from a pipe. Sounding sticks work best on metal pipes, and are less effective on PVC or PE ones.
- 83 Sounding sticks are used by placing the tool against a water meter or exposed pipe and listening to the sound waves generated through the tool. The worker will listen for abnormal noises and feel the vibration of the pipe through the stick. By comparing the intensity and quality of sounds at different points, the worker may be able to triangulate the likely point of a leak (because the frequency and volume of the noise indicates how close a leak is to the testing site).
- 84 Electrical conductivity testing may be used to corroborate findings made using a sounding stick. The answer to Question 5 below describes how Service Stream uses conductivity testing.

#### **G Question 4**

**Is the efficacy of the tests described in your answer to Question 3 above reliant on the stick being within a certain distance of the source of the leak?**

- 85 Yes. As noted above in my answer to Question 3, sounding sticks work by amplifying acoustic vibrations generated by water escaping under pressure from a pipe.
- 86 The intensity and clarity of these sounds diminish as the distance from the leak increases, especially if there are intervening materials such as soil, road surfaces, or pipe joints that may dampen or distort the sound. It is also more difficult to use sounding sticks in heavy rain (because it is more difficult to identify abnormal noises over the background of the rain).
- 87 If the leak is small, deep, or distant from accessible listening points, the efficacy of sounding sticks is reduced, and other methods may be required to locate the source.

#### **H Question 5**

**Describe Service Stream's systems and procedures for testing the electrical conductivity of water when locating a potential leak in SEW's assets. In particular, identify in your answer any:**

- a. **relevant training provided to Service Stream's staff in connection with water testing;**
- b. **parameters used to determine whether or not the water has emanated from SEW's assets;**
- c. **policies, procedures, guidelines or requirements provided by SEW in respect of water testing; and**
- d. **protocols for additional testing to be undertaken on the subject water following an electrical conductivity test.**

- 88 Treated or “potable” water (which is found in water mains and is safe to drink) has a different electrical conductivity profile to untreated water.
- 89 Service Stream crews use electrical conductivity pens (**EC pens**) to test the conductivity of visible water at a leak site. An EC pen is a probe placed into a sample of water which measures its electrical conductivity.
- 90 If the conductivity of the tested water matches the profile of potable water in that area, then it is likely that the water has emanated from a nearby water main or pipe. If not, then it is likely to be from another source (or perhaps from a leak further away).
- 91 To measure electrical conductivity, a worker usually first establishes a baseline conductivity reading for potable water at the location by sampling garden tap water at the site. A typical baseline is between 40-60 microsiemens per centimetre (uS/cm). A sample is then taken of the water from the suspected leak, and compared to the baseline.
- 92 Where the baseline measurement is between 40-60 uS/cm, I understand that if the tested water has a reading of:
- (a) *up to approximately 75 uS/cm*, then the water is quite close to being potable water, and so is likely to come from a nearby leak.
  - (b) *between 90 to 180 uS/cm*, then it may be that it originates from a leak which is further away and the water has travelled.

- (c) *greater than 200 uS/cm*, then it is less likely to be water from a mains leak, and more likely to be stormwater, spring water, groundwater or from another source.
- 93 Service Stream crews will spend as long as reasonably necessary testing a site. Sometimes the source of a leak will be identified within minutes, but testing may also last for hours if the task is more complex.
- 94 If after around an hour of testing the crew has not determined the location of the leak, the Service Stream workers on site will generally escalate the task to a supervisor or Senior Leading Hand. A Senior Leading Hand carries a chlorination kit, and can perform additional tests on the visible water to assess whether it is potable or not (by measuring its chlorine levels).
- 95 As set out at paragraph [22] of my First Statement, if tests conducted by Service Stream workers remain inconclusive, then Service Stream may engage a third-party specialised leak detection service in accordance with the Original Program 1 Contract. This specialist will use more sophisticated leak detection equipment to test the site.
- 96 A trainee Service Stream worker will typically shadow an experienced worker for 6 to 12 months. During this period, amongst other matters, they will learn how to conduct EC tests under the supervision of their more experienced colleague.
- 97 SEW policies relating to water testing under the Original Program 1 Contract were provided with my First Witness Statement at paragraph [19]. They are:
- (a) the 'SEW-PEC-2100 Inspections Service Stream' procedure which is **SST.0001.0001.0006**;
  - (b) the 'SEW-PC-2103 Water Main Repair Procedure for Various Mains' which is **SST.0001.0001.0008**;
  - (c) the 'SEW-PC-2112 Flushing of Water Mains Service Stream' which is **SST.0001.0001.0010**; and
  - (d) the 'SEW-PC-2100 Inspection Checklist' which is **SST.0001.0001.0009**.

98 Service Stream also uses the EC pen guide at **SST.0002.0003.0001**. The EC pen is also called a 'digital water tester' in that guide.

Signed:

Irrelevant & Sensitive

13/06/2025

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**David Lindsay Zropf**

**Dated**