



Water codes review

Submission received through Engage Victoria

Date submitted: 26 July 2022

Submission written by: Gippsland Water

From 14 June 2022, we began accepting submissions on our Water Customer Service Codes Review: Proposal for amendments to the water customer service codes via Engage Victoria (www.engage.vic.gov.au). On this website, people were given the opportunity to send us a response to a set of questions we provided.

What are your views on our draft code?

What is your view on our proposed definition for a small business?

We take small businesses word at face value when they claim they are.

We are interested in stakeholder feedback about the costs and benefits in reducing the undercharging period in the draft water industry standards.

We recommend that this remain unchanged at 12 months. There are implications with estimate reads if the estimate is under the actual use. - refer spreadsheet.

What is your view on whether our proposed amendments to the reminder and final notices are appropriate?

Feedback in relation to the proposed changes are included on the attached spreadsheet. Agree with changing warning notice to Final Notice.

We seek stakeholder feedback on the proposed checklist and whether it meets the varied communication needs of customers.

Agreed

Reference	Change to clause	Code	Current	Feedback to ESC
Proposed time line		Draft decision June 2022 Feedback period 14 July to 26 July 2022 Final decision September 2022 <u>Proposed amendments to take effect from 1 January 2023.</u>		We propose that the new customer code comes into affect from 01/07/2023 to allow us time to review and update our Customer Charter, procedures and processes.
Customer support policy	Proposed update to Clause 10.2	A water business must have a customer support policy and apply it to residential customers who are identified either by themselves, the water business, or an independent accredited financial counsellor as experiencing payment difficulties. 10.1 (payment assistance).	We have a customer support policy. Our current policy does not include a definition of financial stress.	A definition of financial stress included in the code would be helpful to ensure consistency of application of hardship support across the sector. If 'financial stress' is not appropriately defined then customers may be able to take advantage of the water business's hardship protections, i.e., inability to charge interest, restrict, debt collection activities. In the absence of providing a definition, consideration could be given to providing a mechanism for water businesses to seek verification of a customer's financial harship status through an independent third party.
Customer support policy	Proposed update to Clause 10.2	A water business must waive interest accrued prior to the customer being identified as being in hardship and exempt the debt from accruing interest on overdue amounts.	This is not our current process. We currently do not charge interest. Our proposed alternate credit cycle will enable the charging of interest.	This proposed amendment removes the call to action from the customer to engage with us early to discuss their financial difficulties in a timely manner.
Variation of charges	Proposed update to clause 5.1	Water businesses notify each customer of any proposed variation in charges for services applicable to that customer at least 5 business days before they take effect.	Tarriffs are advertised in the newspaper and a bill insert with the new bill.	We proposed the removal of this requirement. * When tarriffs are adjusted, a notice is placed in the newspaper and customers receive the notification with the new bill. At present this does not meet the proposed amendment. * Our ability to meet this proposed amendment a notice to call customers would need to go out in mid June which would drive an additional \$70-\$100K costs in mail.
Special meter readings	Proposed update to current clause 4.2	A water business must not charge a fee to a customer for a special meter reading that is a self-read or if the property has a digital meter.	If we introduce special meter read fees to landlords when a tenant vacates we do not have a policy/procedure around provision of self-reads.	We do not recommend this in the case of change of tenancy readings. A charge to the Landlord should still be applicable to cover the internal cost of processing the read.
Adjustment of bills	Proposed update to Clause 6.6	A water business can only recover an amount undercharged in the four months before they notify the customer, unless the undercharging was a result of illegal use.	An example of this would be if we do not have access to a property for 2 reads and we estimate the bill based on previous usage. Once we receive a update read we would be unable to recharge corrected usage or if there is an undetected leak. This would have financial impacts to the business.	Recommend to leave at 12 months due to estimate bill