

1 August 2022

Ms Kate Symons  
 Chairperson  
 Essential Services Commission  
 Level 8, 570 Bourke Street  
 MELBOURNE VIC 3000

Dear Ms Symons,

**Feedback on Customer Service Codes Review**

South Gippsland Water (SGW) is grateful for the opportunity to provide feedback on the Customer Service Codes Review and appreciates the extension of time to do so.

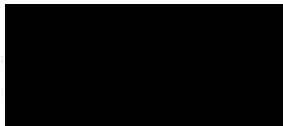
The changes proposed arising from the review of the Customer Service Codes provide stronger outcomes for customers including a wider range of support mechanisms to assist customers experiencing vulnerability. SGW largely supports the proposed changes however assesses issues with a small number, and these are outlined below.

Clause	Comment
Timeframe for introducing new codes	Proposed date of 1/1/2023 is not achievable for SGW due to existing Corporate Plan commitments that require resourcing at this time. Also, consideration is invited to this date clashing with PS2023 submission workload (continuing post-submission end September), implementation expenditure being unbudgeted this financial year, and customer charter changes needed in close proximity to further changes once the Price Determination is made.
2.1 Variation of charges	The resourcing and cost impact of the ‘5-days in advance’ requirement would be significant to SGW and has not been factored into current or forecast budget or FTE. Outbound written communications cost between \$1.00-1.30 in printing and postage per customer (e-notice and hard copy). SGW does not currently have SMS facility. Assuming charges vary once per annum this will add a minimum of \$30,000-\$40,000 operating expenditure to SGW including employee time. Complaint and enquiry data does not evidence current communication timeframes or methods as of concern to customers and SGW has not engaged on this question in the current price submission engagement program.
8. Proactive customer engagement	The clause is worded broadly and open to interpretation of the term ‘proactive’ and also how the indication of early payment difficulties may be assessed. Increasing targeted assessment and outbound written and verbal communications beyond current levels will have an impact on

	operating expenditure for SGW including requiring additional FTE, quantum TBD. This has not been factored into expenditure and FTE forecasts.
10.1c) Payment Assistance and 10.3 Customer support Policy – small business customer	The option of more frequent billing is not achievable due to current billing system capabilities. This option cannot be made available until a replacement utility billing solution is in place in approximately two-three years' time.
15.4 Communication Requirements	The proposed minimum of four contacts represents an increase over current process steps for SGW and will increase operating expenditure including FTE, quantum TBC. An increase to operating expenditure and FTE has not been forecast.

We invite consideration of this feedback and can be available to discuss in further detail should such assist.

Yours Sincerely



Annette Katiforis  
 General Manager People, Culture and Customer