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DEVELOPING A HARDSHIP RELATED GUARANTEED SERVICE LEVEL MEASURE

SUMMARY OF STAKEHOLDER SUBMISSIONS

SEPTEMBER 2010

Overview

The Essential Services Commission received 19 submissions in response to its issues paper *Developing a Hardship Related Guaranteed Service Level Measure* up to and beyond the 30 July 2010 deadline. We made them available to the public on our website, except for one submission which was provided on a confidential basis. Table 1 lists the names of the organisations that provided a submission, (excluding the submission that was provided to the Commission confidentially).

This paper categorises the formal submission responses to the five questions raised in the Commission's issues paper. We have made editorial changes in some instances, although we have made sure not to alter the intended substance of the views or points put forward by those making submissions. Each submission is available in full on our website – www.esc.vic.gov.au.

Table 1 Submissions received on the June 2010 issues paper

Barwon Water	Gippsland Water
Central Highlands Water	Goulburn Valley Water
City West Water	Lower Murray Water
Coliban Water	South East Water
Consumer Action Law Centre (CALC)	South Gippsland Water
Consumer Utilities Advocacy Centre (CUAC)	Wannon Water
East Gippsland Water	Western Water
Energy and Water Ombudsman (Victoria)	Westernport Water
Financial and Consumer Rights Council Inc.	Yarra Valley Water

Q. The Commission is interested in stakeholder views regarding the proposed \$200 threshold for the amount owed, below which a water business could not commence legal action or take steps to restrict service.

Barwon Water	Does not currently take legal action or restrict customers where the balance owing is below \$200. Request that the current Code provisions relating to the ability to restrict a customer's supply due to non-payment of consecutive bills over a period of more than 12 months be retained in the Code.
Central Highlands Water	Supports the ESC raising the threshold to \$200, and note that it is preferred that the clause relating to failure to pay consecutive bills over a 12 month period is retained. Seek clarification from the Commission on this issue. Note that there are instances where it can take several years for a customer to reach threshold (particularly for tenants).
City West Water	Does not currently restrict a customer's water supply or commence legal action where debt is below \$200 threshold, thus support the Commission's proposed amendment to the Code to adjust the threshold.
Coliban Water	Concerned about proposed increase to the threshold without also allowing for restricting a property where the \$200 is not reached but bills have not been paid over a period of 12 months. Welcome reduction of the proposed \$200 threshold or the maintenance of the 12-month non-payment of accounts threshold criteria.
Consumer Action Law Centre (CALC)	<p>Strongly support the proposed increase in the threshold. The increase is an important recognition of the rising costs of living across all sectors and more specifically the significant increases in water bills since the \$120 threshold was set.</p> <p>Propose that the Commission commit to either reviewing the threshold on a regular basis, say every two years or indexing it to CPI, and undertaking a more comprehensive review in response to trigger events such as increasing numbers of restrictions or legal action.</p>
Consumer Utilities Advocacy Centre (CUAC)	<p>Strongly supports Commission's proposal to raise the threshold to \$200, noting that where customer protections relate to specific amounts, it is important that these are updated in line with price changes and the shifting economic context.</p> <p>Favours a regular review of this and similar thresholds to ensure they continue to reflect economic conditions and specific developments in the water sector. Suggest an annual review of thresholds against the CPI.</p> <p>Note that the Codes do not explicitly prohibit water businesses from threatening legal action over amounts below the threshold. CUAC is aware of multiple instances</p>

	<p>where customers have received written threats of legal action due to non-payment of amounts less than \$120. Suggest amending the code to explicitly disallow water businesses to commence or threaten legal action or restriction when a customer's debt level remains below the threshold.</p> <p>Note the importance of monitoring compliance against this provision in the Customer Service Codes. CUAC is aware of a number of cases of non-compliance and raising the threshold will not, in and of itself, ensure that customers are protected from wrongful restriction or legal action.</p> <p>Would support a stronger audit role by the Commission and encourages the ESC to investigate a stronger audit role in more detail.</p> <p>Believes that with small outstanding amounts of less than \$200, restriction and, in particular, legal action is disproportionate and unnecessary in response to a customer's failure to pay consecutive bills over a 12 month period. Urge the ESC to remove the provision from the Code that specifies this 12 month period.</p>
East Gippsland Water	The \$200 threshold before a water business could commence any legal action or take steps to restrict is agreed. The cost of proceeding to legal action and restriction against customers must be considered in light of the debt at risk. EGW does not commence any legal action for amounts less than \$700.
Energy and Water Ombudsman (Victoria)	In view of rising water prices, support the suggestion to increase the threshold for the amount owed, below which a water business cannot commence legal action or take steps to restrict a customer's service due to non-payment.
Financial and Consumer Rights Council Inc.	No specific comments made.
Gippsland Water	<p>Concerned that other issues requiring consideration in assessing the threshold amount have not been raised in issues paper.</p> <p>Any changes to threshold must not limit a water corporation's ability to take action where the customer fails to pay consecutive bills in full over a period of not less than 12 months (as currently outlined in the customer service code). Condition remains essential for managing customer accounts and must be retained.</p> <p>Question whether multiple thresholds should exist e.g. one for owner occupiers and one for tenants. A \$200 threshold would seem excessive for tenants.</p> <p>Any increase in the threshold may delay the process of identifying customers who genuinely find themselves in hardship but are reluctant to engage with the water</p>

	<p>corporation. The smaller the outstanding debts, the easier customers can find the process of dealing with outstanding commitments.</p> <p>Internal data supports the contention that applying restrictions leads more customers into a negotiated agreement.</p>
Goulburn Valley Water	<p>Supports the lifting of the threshold amount from \$120 to \$200 debt before a water business can restrict or take legal action. Make the assumption that there will be no change to the Code that removes the “or 12 months without payment clause” as many tenant accounts are much less than \$200 per annum.</p> <p>There will also be process changes internally to capture customers that fall into the \$120 - \$199.99 category if accounts are not paid on initial invoice or reminder.</p>
Lower Murray Water	<p>Recommend that the current threshold of \$120 be retained, especially in the case of tenants who may take longer to reach the threshold.</p>
South East Water	<p>Supports the increased threshold – does not give consideration to taking legal action against customers for amounts less than \$500 as the associated costs make this form of debt recovery prohibitive.</p>
South Gippsland Water	<p>No specific comments made.</p>
Wannon Water	<p>Note that intervention at the earliest possible opportunity allows for maximum assistance to be provided to customers whilst also ensuring the level of debt does not reach an insurmountable level.</p> <p>In relation to tenants where Wannon Water is not able to make contact by telephone, raising the threshold to \$200 will result in intervention taking longer than it currently does, thus reducing the assistance that Wannon Water is able to offer the customer.</p> <p>Requests that the Commission retain within the Code that water corporations are able to commence legal action or take steps to restrict a customer’s service due to non-payment if the customer has failed to pay consecutive bills in full over a period of not less than 12 months.</p>
Western Water	<p>Supports proposed amount – appropriate given the rising costs of service since 2005.</p>
Westernport Water	<p>Support proposed \$200 threshold.</p>
Yarra Valley Water	<p>Support proposed \$200 threshold – do not currently commence legal action or restrict customer supply for debts under \$200.</p>

Q. The Commission is seeking stakeholder views on the proposed check-list for minimum “reasonable endeavours” to contact a customer. This may be in terms of additional or substitute steps that may be worthwhile (and why)?

Barwon Water	Agrees with principles of check-list. Notes that steps 4 and 5 might be taken either verbally or by written notice and seek clarification of this point.
Central Highlands Water	Supports the proposed check-list, noting it is consistent with internal procedures, and objective and auditable. Express concern over the lack of a corresponding timeframe. Suggest consideration be given to setting a maximum period between the final contact under the steps in the check-list and the application of a restriction or legal action.
City West Water	Takes the decision to restrict a customer’s supply or commence legal action very seriously. Currently make every effort to contact a customer prior to taking this necessary, but least-preferred action. Therefore, City West Water supports the check-list as proposed by the Commission.
Coliban Water	Proposed check-list contains one step additional to Coliban Water’s current practice. This will have a cost impact on the business. Query whether contact by an authorised agent is included in number of attempted contacts. Query whether personal contact includes registered mail (suggest it should substitute for one contact even if phone number on file or both contacts if no phone number on file). Believe registered mail provides additional method of engaging the customer and workload will increase significantly if this is not included in the check-list. Critical that costs of administering GSL are recognised by ESC and should be allowable item for adjustments from previous period in the next regulatory period.
Consumer Action Law Centre (CALC)	Supports the Commission's check-list approach to the GSL measure, in particular the inclusion of "reasonable endeavours to contact a customer", with restriction and legal action taking place only after the relevant steps have been followed. Steps 4 and 5 require an amendment that reflects the need for water businesses to attempt personal contact on two separate occasions, with at least one of those contacts outside of business hours.
Consumer Utilities Advocacy Centre (CUAC)	Believes the proposed checklist does adequately reflect ‘reasonable endeavours’ to contact a customer. Welcome the addition of steps 4 and 5, requiring attempts at direct contact via both telephone and a

	<p>personal visit. By attempting multiple types and times of contact, a water business increases the chance of successful engagement.</p> <p>With regard to step 4, CUAC suggests an amendment requiring that one of these phone calls occur outside of business hours. This would increase the likelihood of successful contact with customers who are employed (but may still be experiencing financial hardship) or otherwise occupied during the day.</p> <p>For similar reasons, if the business has access to more than one telephone number, they should attempt to contact the customer via each of these.</p>
Consumer Action Law Centre (CALC)	<p>Supports the Commission's checklist approach to the GSL measure, in particular the inclusion of "reasonable endeavours to contact a customer", with restriction and legal action taking place only after the relevant steps have been followed.</p> <p>Suggest that Steps 4 and 5 require an amendment that reflects the need for water businesses to attempt personal contact on two separate occasions, with at least one of those contacts outside of business hours.</p>
East Gippsland Water	<p>Agreed to by East Gippsland Water – note that they currently apply a similar stepped process.</p>
Energy and Water Ombudsman (Victoria)	<p>Acknowledge that it sometimes can be difficult for a water business to engage customers experiencing financial hardship. However, EWOV agrees with the ESC's view that restrictions and legal action should not be used as the main means of getting a customer to react, they should be used as a last resort when other methods have failed.</p> <p>The check-list seems easy to understand and is comprehensive. Based on EWOV's experience in handling wrongful disconnection complaints in the energy sector, the importance of good record keeping cannot be emphasised enough. This should put water businesses in a good position to resolve any disputes directly with a customer.</p>
Financial and Consumer Rights Council Inc.	<p>No specific comments made.</p>
Gippsland Water	<p>No concerns with proposed check-list. Not dissimilar to current practices adopted by GW.</p>
Goulburn Valley Water	<p>Believes the reasonable endeavours steps ensure that customers receive a variety of contact methods and see no problems with implementing these.</p> <p>Should be some discretion in the process for water businesses to make decisions of where and when</p>

	<p>different contacts should be made.</p> <p>Seeks some clarification regarding customers who have entered into a payment plan but then defaults. When setting up a payment plan these customers are then removed from collections processes however there is a tendency for some of these customers not to honour the agreement made. Where in Table 1 would we be expected to re-commence contact prior to restricting or taking legal action?</p>
Lower Murray Water	<p>Agree with principles of reasonable endeavours steps. Steps 4 and 5 however (phone contact and personal visit to a customer's property) would require significant increase and some shift of resources. Costs would eventually be passed on to customers.</p> <p>Costs involved with specialised training for customer service staff, including visiting field staff, in the identification and assessment of customers in hardship may be partially offset by less involvement of meter staff in installing restrictive meters.</p>
South East Water	<p>The current process followed by South East Water conforms to the proposed check-list and therefore supports the check-list proposed by the Commission.</p>
South Gippsland Water	<p>Believe steps will create unnecessary administrative burden. Personal visits can take as long as three hours with no guarantee anyone will be home. Believe should only be made to make one personal visit and that should be the end of the process.</p> <p>Step 4 (registered mail) should be removed. Question value of having customer sign for mail. Customers are aware of their accounts, but some simply choose not to contact the corporation. A number of customers will also not sign for registered mail.</p> <p>Need to make steps very clear. Remove discretionary decisions such as those in step 4 as it may create confusion and different approaches between corporations should not be encouraged.</p> <p>Query whether message left on phone counts as a contact?</p>
Wannon Water	<p>Step 5 requires one attempt at personal visit by a water corporation. Wannon Water covers an area of approx. 24,000 km. Considers that the value added by attempting a personal visit would be exceeded by the costs to undertake same. This cost would feed into tariffs.</p> <p>Have tried the approach on a local level and found that in many instances the customers found the experience confrontational and demeaning and became very reluctant to engage in a meaningful way.</p> <p>Wannon Water has found that customers have a</p>

	<p>tendency to respond to good quality hardship information packs provided by Wannon Water and other contact methods such as SMS that allow them to consider information in a non-confrontational manner.</p> <p>Proposes that the requirement for a personal visit be deleted and replaced with a requirement that the water corporation provide the customer with a hardship pack containing information on assistance available through the water corporation's hardship programs and other forms of assistance such as a utility relief grant.</p> <p>Seek clarification that a GSL would not apply in instances where it has been confirmed that the water corporation forwarded the notification to the customer's address in accordance with the Customer Service Charter.</p> <p>Customers acquainted with debt collection procedures may not accept certified mail.</p>
Western Water	<p>Steps essential mirror current Western Water's current procedures. However, the identification of hardship can be extremely difficult.</p> <p>High quality training of customer service staff is also required and Western Water supports the Commission's view on this matter.</p> <p>Given the difficulty of identifying hardship, it is important that the Commission does not stifle innovative approaches to improving this area by mandating processes that are too rigid. These processes may differ between rural and metropolitan environments.</p> <p>Careful consideration by the Commission should therefore be given to the flexibility staff have in applying innovative approaches to this area. A 12 month review after the introduction of the GSL is therefore appropriate.</p>
Westernport Water	<p>Support additional requirements as outlined in step 4 (phone contact), already undertakes first three steps.</p> <p>Notes that 60% of its customer base are non-permanent residents and the new step 5 (personal contact) is not practical for all customers. Therefore, it does not support a mandated personal contact for all customers.</p>
Yarra Valley Water	<p>Believe it is important that prior to instigating legal action or restriction of service to a residential customer that they are provided the opportunity to either self-identify or be identified through debt collection and/or hardship support mechanisms including site visits.</p> <p>Support the recommended check-list which is consistent with Yarra Valley Water's current approach.</p>

Q. Stakeholders may wish to comment on the proposed GSL, or propose an alternative GSL measure (and provide a rationale as to the strengths of the suggested alternative approach).

Barwon Water	Supports the proposed GSL.
Central Highlands Water	Supports the proposed GSL and that the test against it be undertaken in the first instance, by the water business and if the customer is not satisfied with the outcome then they may have the matter investigated by EWOV.
City West Water	Support proposed GSL and agrees that compliance be tested internally by water businesses and escalation to EWOV if customer not satisfied with outcome. Request that ESC confirm that GSL applies only to residential customers.
Coliban Water	<p>Serious concern about proposal that the customers issue be referred to EWOV in the event of dissatisfaction with internal water business review – adds unreasonably to costs regardless of investigation outcome (EWOV charge business case handling fees whatever the finding).</p> <p>Proposed process involve internal business review against check-list or process advised by ESC and then outcome be advised to ESC with supporting evidence. ESC can make a determination on the business decision.</p>
Consumer Action Law Centre (CALC)	<p>Agree with the introduction of a GSL payment to be made by water businesses for restricting the water supply of, or taking legal action against consumers when they haven't complied with the GSL measure, including by taking reasonable endeavours to contact a customer to determine whether they are experiencing hardship.</p> <p>The GSL measure should ensure that customers eligible to participate in a hardship program, but who have failed to be identified or offered hardship assistance by a water business, have the opportunity to participate. We support the proposal that the water business have the first opportunity to assess their performance against the GSL measure, with (EWOV) having a subsequent opportunity to provide an independent assessment.</p> <p>Deeply concerned by the introduction of a “hardship test” by the Commission. Suggests that consumers need to complete a test or be assessed by the water business to determine whether they are eligible to receive payment assistance. This empowers the water business to determine whether the consumer is in fact experiencing hardship or not and crucially, it removes the right of the consumer to self-identify as experiencing hardship.</p> <p>For the majority of businesses that do not have best practice hardship policies, the introduction of a hardship test will only support a punitive approach (i.e. restrictions</p>

	<p>and legal actions) to consumers by businesses.</p> <p>Strongly urge the Commission to remove any reference to a "hardship test" and refer instead to "offering consumers access to the water business' hardship program where the customer is identified or self-identifies as experiencing hardship". Can not support the drafting of the GSL as it is and urge the Commission to remove or redraft.</p>
<p>Consumer Utilities Advocacy Centre (CUAC)</p>	<p>The proposed GSL is narrow and requires substantial amendment. In particular, CUAC is concerned that the measure downplays the right of customers to self-identify as experiencing hardship and that it does not require businesses to offer effective assistance to those who are identified as being in hardship.</p> <p>CUAC has strong concerns about the concept of a business "testing" for hardship, and that it positions the businesses as the arbiters of whether or not a customer is experiencing financial hardship.</p> <p>CUAC believes that by focusing narrowly on whether the business has tested for hardship the GSL gives water businesses too much power to categorise the customer as experiencing or not experiencing hardship.</p> <p>The proposed GSL does nothing to ensure that this categorisation is appropriate or that the customer has been given the opportunity to self-identify as experiencing hardship.</p> <p>Suggest that at a minimum, the ESC amend the wording of the proposed GSL to emphasise the role of self-identification.</p> <p>CUAC is also concerned about the extent to which the proposed GSL measure will provide additional protection for consumers once they have been contacted and tested for hardship by the water business i.e. the proposed GSL would not trigger a GSL payment where a business had contacted a customer and undertaken a hardship test (CUAC note that restricting a customer identified as being in hardship, and who are complying with a payment plan, would be against the provisions in the Customer Service Code).</p> <p>To provide further assurances for consumers and incentives for businesses to treat customers experiencing hardship appropriately, CUAC suggests an additional hardship GSL measure to complement that proposed by the ESC:</p> <p><i>Restricting the water supply of, or taking legal action against, a customer who has been identified as experiencing hardship, and who is making payments according to an agreed payment plan.</i></p>
<p>East Gippsland Water</p>	<p>Introduction of GSL not supported. It will be of minimal</p>

	<p>benefit to customers and will lead to unnecessary administrative costs.</p> <p>The low number of complaints (related to water restriction and legal action) is not sufficient evidence to support the need for implementation of an intervening hardship GSL to a system that is performing above industry standard.</p> <p>Believes that customer education to help break down communications barriers with businesses; improved understanding on the availability of flexible payment arrangements and support for customers in hardship would be more beneficial and advantageous.</p> <p>Proposed approach requires EWOV to be fully educated on the complexities of the hardship proposal. Appropriate time needs to be provided so that EWOV staff are trained to deal with hardship cases.</p>
Energy and Water Ombudsman (Victoria)	Support the ESC's proposed approach. Note that customers already have the right to contact EWOV if they have been unable to resolve a complaint directly with their water company. Given the relatively low number of restriction cases there is no reason to think that the introduction of the GSL measure will lead to a dramatic increase in complaints.
Financial and Consumer Rights Council Inc.	No specific comments made.
Gippsland Water	<p>Not a strong supporter of the push to establish a hardship related GSL given that restriction levels across the industry are very low compared with energy. GSL not likely to lead to a dramatic reduction in the level of water restrictions applied. The largest contributing factor is the difficulty Gippsland Water encounters in locating and engaging with customers on non-payment.</p> <p>GSL does not clearly define that it applies to residential customers only. Propose that wording be amended to include reference to residential customers.</p>
Goulburn Valley Water	No specific comments made.
Lower Murray Water	Consider that the Commission should audit Lower Murray Water's restriction process as part of the annual audit and not involve EWOV. EWOV should only be involved when a customer makes contacts with them due to restriction or other dispute issues.
South East Water	Support introduction of GSL relating to customers experiencing financial hardship.
South Gippsland Water	No specific comments made.

Wannon Water	Seek confirmation that GSL applies only to residential customers.
Western Water	Supports introduction of a GSL measure to be applied if internal procedures are not correctly followed. The GSL will act to strengthen these internal procedures which is a very positive outcome.
Westernport Water	Support the proposed GSL measure and believe that the use of the checklist will provide an objective and auditable process.
Yarra Valley Water	Approach is supported as it is consistent with how other GSL's are managed and also reinforces the need for the water retailer to establish strong and appropriate processes to identify customers in financial difficulty.

Q. The Commission is interested in views from stakeholders regarding the proposed coverage of the GSL, and intent to review the proposed approach after one year of operation in order to inform broader roll-out.

Barwon Water	Will implement the GSL by end 2010. The proposed review period is satisfactory, and would like to be included in review.
Central Highlands Water	Supports the proposed approach to rollout and will endeavour to comply with it in readiness for broader implementation.
City West Water	No objection to being amongst the first water authorities to implement proposed GSL. Welcome opportunity to further inform debate regarding further implementation.
Coliban Water	Note that Coliban Water has a higher rate of restrictions than many other regional businesses, but has significantly higher rate of payment arrangements than other water businesses reflecting willingness to work with customers in hardship. Accept proposed coverage by end of 2010, and endorse review process.
Consumer Action Law Centre (CALC)	Strongly urge the Commission to expand the scope of implementation to cover all water businesses, metropolitan, regional and rural. Failure to apply it to rural water businesses, fails to recognise that consumers in regional and rural areas, which are often hard hit by economic and environmental conditions, require increasing assistance with the retention of access to potable water
Consumer Utilities Advocacy Centre (CUAC)	CUAC strongly believes that the purpose and relevance of the GSL measure (rather than the origin of the proposal) should determine the hardship GSL measures scope. The measure should be implemented by all Victorian water businesses as soon as practicable. CUAC also note variability in business rankings in rates of restrictions and legal actions.
East Gippsland Water	Approach for rollout should be informed by current information for 2009/10. Also proposed that rates of restrictions and legal actions combined be used to determine companies affected.
Energy and Water Ombudsman (Victoria)	No specific comments made.
Financial and Consumer Rights Council Inc.	Coverage of the GSL should extend to all water companies and not just those listed in the Issues Paper. All regions should be subject to the GSL with a review after 12 months to refine and amend the GSL as necessary.
Gippsland Water	Prepared to be at forefront of Commission's proposed

	measure to implement GSL, to determine whether the GSL results in a dramatic reduction in restrictions.
Goulburn Valley Water	We agree that a full review of any implemented GSL be undertaken after one year of operation with all participating water businesses so a cross section of views can be presented with a view to modifying if needed.
Lower Murray Water	All corporations should implement GSL at the same time.
South East Water	Supports the proposed approach and will be ready for implementation by the end of 2010.
South Gippsland Water	No specific comments made.
Wannon Water	Support proposed coverage. Suggest that the timing of implementation for corporations not required to implement the proposed GSL by the end of 2010 occur at the same time as potential changes to the Customer Service Code following review of legislative amendments. This would reduce costs associated with modifying and implementing updated Customer Charters and Charter Summaries.
Western Water	Western Water incorrectly included in the list of high restrictors. This is an error. Support proposed review as improvements in this area are especially important and any learnings should be communicated to all parties in the sector.
Westernport Water	We support the coverage and timing of the proposed GSL as this provides us with the time to ensure we are fully resourced to manage any additional workload as a result of the additional contact regime.
Yarra Valley Water	Support the approach and are in a position to implement when the ESC releases its final position paper. Prepared to assist the Commission in any review of the GSL prior to broader rollout.

Q. Stakeholders may wish to comment on the proposed payment amount and process that would apply in the event of a breach of the proposed GSL.

Barwon Water	Support proposed payment amount and welcomes option for business to credit customer account.
Central Highlands Water	Support proposed payment amount and the discretion of water business to credit customer accounts.
City West Water	Consider proposed payment amount appropriate.
Coliban Water	<p>Accepts proposed payment amount, based on appropriate investigation of the action, review of CRM records and clear establishment that breach has occurred. Daily breach fee accrual not considered appropriate, however.</p> <p>Useful if Commission could provide water entities with a standard check-list against which action steps could be referenced prior to restrictors being installed and thus provide part of the record against which a water entity would be assessed in the event of alleged breach.</p> <p>Considers payment of GSL as credit on account rather than cash transfer appropriate.</p>
Consumer Action Law Centre (CALC)	<p>Recommend payment amount be set at \$500 which more appropriately reflects the seriousness of restriction and legal action in the instances where consumers have not been offered access to a hardship program, and also acts as a genuine incentive for good management of the customer impacts of proposed price rises and adherence to the GSL measure.</p> <p>Note that rates of restriction do not adequately indicate the impact of a restriction in the instances where the household has multiple occupants. Do not believe a \$500 payment amount would place undue cost pressures on businesses as the GSL event should occur rarely, if ever.</p> <p>Strongly disagree with Commission's proposal that payment amounts be credited to customer accounts at the sole discretion of the water business. The GSL payment is being made because the business failed to follow the GSL measure and offer the customer assistance with payment. It would appear at cross purposes if the business could have the ability to choose how and where these funds are allocated.</p>
Consumer Utilities Advocacy Centre (CUAC)	<p>Since breach of the proposed GSL should occur only rarely, if ever, CUAC believes an amount of \$500 would not place an undue burden on water businesses. Given seriousness of wrongful restriction and legal action in water, a \$500 payment amount is appropriate.</p> <p>Firmly oppose proposition that a water business have the discretion to credit consumer accounts rather than make a payment to customer, as it grants control over monies</p>

	paid to a consumer back to a water business. A business should not have the power to determine how the money (paid for poor customer service) is spent.
East Gippsland Water	No specific comments made.
Energy and Water Ombudsman (Victoria)	No specific comments made.
Financial and Consumer Rights Council Inc.	No specific comments made.
Gippsland Water	Agree with Commission's intent to allow crediting of customer accounts. Believe \$300 amount is unnecessarily punitive given that it may be up to 50% more than the amount owed by the customer. Propose that the amount be limited to the lower of \$300 or the amount owed by the customer. Providing windfall gains to customers who themselves have not paid bills is unreasonable and sends the wrong message to customers who do pay their water bills on time or make the effort to seek assistance in times of difficulty.
Goulburn Valley Water	Believe the proposed payment amount is out of line with other GSL payments. Propose \$100.
Lower Murray Water	Oppose mandatory application of monetary value to a GSL, but do agree that a fixed amount is preferred and the nominated sum of \$300 is reasonable for those Corporations that decide to apply a monetary amount.
South East Water	Support the \$300 payment amount, and the ability to credit any payment amounts against the customers outstanding account balance.
South Gippsland Water	Hefty but if someone is inconvenienced due to a failure in the business's process the customer should be compensated appropriately.
Wannon Water	Notes payment amount.
Western Water	Believe that \$300 payment amount is excessive however note the strong views of the consumer groups and appreciate their concern that internal processes must be rigorous in this area. In this context, Western Water accepts the Commission's proposed fixed amount of \$300.
Westernport Water	Support proposed fixed payment and welcome resolution of option for a business to credit customer's account.
Yarra Valley Water	Given the impact on customers of undertaking legal action or restriction of supply when they are in financial difficulty and unable to pay their outstanding debt, Yarra Valley Water fully supports the proposed payment amount.

