



Greater Western Water
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26 July 2022

Marcus Crudden
Executive Director, Price Monitoring and Regulation
Essential Service Commission
Level 8, 570 Bourke Street
Melbourne, VIC, 3000

Via Email: [REDACTED]
cc: water@esc.vic.gov.au

Dear Mr Crudden,

Water Customer Service Codes Review

We welcome the opportunity to review and provide feedback on the proposed amendments to the *Customer Service Code: Urban Water Businesses*.

We support the proposed amendments and additions to the new *Water Industry Standard – Urban Customer Service* (the Standard). These amendments strongly align with our 2030 Strategy vision of 'thriving communities and caring for country' and are consistent with practices we have applied during the COVID-19 pandemic.

We thank the Commission for the opportunity to provide feedback and believe collaboration will achieve the best results and protections for our customers. After consulting our customer support practitioners and reliability engineers across Greater Western Water, we have feedback for the Commission to consider in its deliberations. This is provided in Attachment A.

We look forward to continuing to work with you through the implementation of the customer codes and to continuously improving our approaches and systems to support vulnerable customers, community, and our staff.

If you have any further questions or queries, please do not hesitate to contact Jessica Saigar, Manager Strategy and Regulation, on [REDACTED] or at [REDACTED].

Kind Regards,

[REDACTED]
[kirsty henry \(Jul 26, 2022 15:14 GMT+10\)](#)

Kirsty Henry
Acting, General Manager Strategy and Partnerships

Attachment A – Feedback on the amendments

Timing

On timing, the Commission is proposing to implement the Standards by 1 January 2023. We would recommend that there is a transition period of another 6-12 months to allow for all changes to be implemented, particularly for those that are related to information technology changes. For Greater Western Water, these changes are amplified by updates required across two systems for our diverse service area.

Category	Code ref.	Standard ref.	GWW comment
Customer self-reads	-	5.1	GWW supports this inclusion as it is already within our current practice.
Digital metering and data collection	-	5.3	GWW supports this inclusion, even though we currently do not have digital water meters in our network for billing purposes.
Special meter readings	4.3	5.2	GWW supports this inclusion. While we have a special meter reading fee, it is not charged under these circumstances.
Billing cycle	4.1	6.1	<p>GWW would like the ESC to clarify the inclusion of the word 'quarterly' in 6.1 (b) and (c). We suggest that this word be replaced with 'quarterly or as agreed under 6.1 (a)'. This would avoid confusion for both customers and water businesses who bill less frequently than quarterly.</p> <p>GWW supports the inclusion of 'higher than average' to provide guidance on when more frequent billing may occur. We suggest that 'high' be replaced with 'higher than average' trade waste and sewage disposal.</p>
Content of bills	4.4	6.3	GWW supports these inclusions as it aligns with our current practice. We suggest that the wording on 6.3 (e) be amended to 'the customer's water usage for the current billing period'.
E-bills	-	6.5	<p>GWW suggests that the ESC define what an e-bill is. GWW currently sends an email with a PDF link to the bill. We do not current send a summary information as listed in the e-mail.</p> <p>Our current technology solution does not permit us to modify the email contents to include this. Once we have implemented the new billings and collection system, these can be incorporated into the email.</p>

Category	Code ref.	Standard ref.	GWW comment
			We suggest the wording for 6.5 (b) (iv) be amended to 'water usage for the current billing period'.
Adjustment of bills	4.8	6.7	<p>The water industry typically reads meters every 3-4 months. We are unable to read meters on demand as in the electricity sector and have a less frequent meter reading cycle than the gas sector (2 months).</p> <p>As GWW currently has a billing cycle of 4 months for some of its customers, we would support a move to 8 months as this would allow 2 meters reads to occur to identify any issues in undercharging. This move would be in line with the energy sector. We would also support the ESC in changing the timing to be no more than two normal billing cycles.</p>
Reminder and Final notices	6.1 & 6.2	15.2 & 15.3	<p>GWW would support reminder notices being sent to a customer no later than 4 business days after the due date of the bill. This would be in line with processing times for BPAY which can take up to 48 hours to process. By reducing the time to less than two business days, it could result in confusion for customers who have paid the bill via BPAY on the due date.</p> <p>GWW would recommend that the wording on 15.2(c) iv) and 15.3 (b) (iii) be amended as a new due date cannot be issued in the system. <i>'the due date of the original invoice and a date at which further action will take place'.</i></p>
Communication assistance	12.9	13.6 & 13.7	We are supportive of strengthening this Standard. GWW is currently investing in SMS and webchat options for interpreter services to make it easier for our diverse community to engage with us.
Appropriate communication	-	15.1	We regularly review our bill communications to ensure its accessibility and support the ESC embedding this in the Standard.
Proactive Customer Engagement	-	8	We are supportive of this inclusion in the Standard. GWW currently engages proactively with customers to encourage them to reach out if they need support from us.
Customer's chosen representative or support person	-	9.1	GWW is supportive of this inclusion as it mirrors our current practice.

Category	Code ref.	Standard ref.	GWW comment
Provision of customer charter and summary charter	18.3	24.3	<p>GWW strives to have its charters and summary charters in a plain language format that can be easily understood by all customers.</p> <p>We are consistently working with our diverse community to ensure that our customer charter is available in a format and language that is accessible to them. We support the inclusion of this in the new Standard.</p>
Variation of charges	2.1	2.1	<p>GWW understands this means that water businesses are required to notify all customers in writing of new prices (and other variations) at least 5 business days prior to taking effect.</p> <p>This seems to be excessive for customers, given we publish tariffs in a local circulating newspaper and on our website. Unlike the energy sector, where customers can choose to change retailers and therefore it is a logical reason to notify a customer of price changes, water customers do not have this option.</p>
Flexible Payment Plans	5.2	7.2	<p>We would recommend that the ESC defines a flexible payment plan. An appropriate definition may be:</p> <p style="padding-left: 40px;">A flexible payment plan is a plan agreed to between the customer and the water business that has modified either, or a combination of, the due date, the payment frequency, and amount required per payment.</p> <p>GWW would like to propose different wording for 7.2 (a) (iv): may be able to be modified, at the request of a customer, to accommodate for demonstratable change in their circumstances.</p> <p>GWW supports the Standard prescribing the content of the letter. We would propose that 7.2 (b) be:</p> <p style="padding-left: 40px;">On establishing a flexible payment plan or a revised plan, the water business must give the customer a schedule of payments in writing, delivered by the customer's preferred method of communication...'</p>
Payment difficulties assistance	5.3	10.1	<p>GWW does not have digital meters and as such are unable to offer customers more frequent billing options. Under a flexible payment plan, we can offer more frequent payment options but are constrained by meter reading cycles to bill to offer more frequent billing. Our meter reading cycles are once every 3 months in the previously City West Water area and once</p>

Category	Code ref.	Standard ref.	GWW comment
			<p>every 4 months in the previously Western Water Area, and as such can only issue bills at those times. As we investigate digital metering and its application across our service region, we will be able to offer customers more frequent billing options.</p> <p>With supporting customers to submit an URG application, this is already within our current practice and are supportive of the practice being standardised across the sector.</p>
Customer support policy – residential customer	5.4	10.2	GWW's customer care team already do this, and we support the inclusion in the Standard to make this practice consistent across the state.
Small business definition	Part D	Part G	GWW sees no issue with this definition.
Customer support policy – small business customer	-	10.3	<p>GWW proposes the use of a qualified accountant rather than a financial counsellor to advise whether a business is experiencing payment difficulty.</p> <p>As there are different avenues for debt recovery with a non-residential customer as a business is not a natural person, therefore the Standards should continue to permit debt recovery processes for small businesses.</p>
GSL schemes	13	20	GWW supports this inclusion.
Reasonable endeavours checklist relating to legal action or collection of debt.	-	15.4	GWW is supportive of this checklist.
Interest on unrecovered amounts	6.4	15.5	GWW suggests that the wording be amended to state that customers on a current payment plan. This would mean if a customer broke a payment plan, interest may be applied retrospectively. Suggested wording on 15.5 (b) (ii) 'is currently on a payment plan.'

Category	Code ref.	Standard ref.	GWW comment
Maximum rate of interest that may be charged	6.5	15.6	GWW currently uses the maximum interest rate charged to calculate interest on refunds where we, or a customer, has identified an overcharging incident. GWW recommends that the interest rate for debt incurred prior to 30 June 2013 remain in the Standard for the purposes of calculating interest on refunds.
Dishonoured payments	6.7	15.8	GWW supports this inclusion. We do not recover costs associated with dishonoured payments to customers holding an eligible concession card or those receiving assistance under our hardship policy.
Restriction to be a measure of last resort	-	16.1	GWW has several support programs for customers experiencing payment difficulty. In taking action for non-payment, legal action is a measure of last resort. We are concerned about the inclusion of restriction being the last resort.
Limits to restriction and legal action	7.2	16.2	GWW supports the increase from \$200 to \$300 of seeking legal action in line with increases in bills since the last substantive update to the Customer Service Code.
Life support and other special circumstances	-	16.4	We have policies and procedures for this already in place. Special needs, as per the current code, is defined on a case-by-case basis. We would ask the ESC to provide guidance or examples on what is special needs to ensure consistency across the state.
Restriction and Legal Action	7.1	16.5	GWW supports this inclusion.
Details of proposed service quality and reliability amendments	8.2, 8.3 & 8.4	17.2, 17.3 & 17.4	GWW does not see any issue with this proposal.
Service standards		18.1	GWW supports the re-positioning of services standards to focus on the minimum levels of service a customer should receive and developing a strong linkage between service standards and GSLs.

Category	Code ref.	Standard ref.	GWW comment
			<p>We would like to propose an alternative to the word 'should' in the new standards. The use of the word 'should' indicates there is something everything customer receives during a 12-month period. We would suggest using 'may', such as:</p> <p>Maximum number of unplanned water supply interruptions a customer should may experience in a 12-month period</p> <p>Maximum number of sewer blockages a customer should may experience in any 12-month period</p> <p>This then provides a good linkage to a Guaranteed Service Level Payment for those few customers who receive more than the maximum number of unplanned water supply interruptions or sewer blockages in a year.</p> <p>We have no issues with having the service standards set at a single target over a regulatory period to represent the minimum level of service a customer can expect.</p> <p>Suggest these come into effect at the next determination for each business. For GWW this will be 1 July 2024.</p>
Minimum water pressure	8.9, 9.2	17.2, 18.2	<p>GWW prefers the use of minimum flow rate as it is easier for customers to understand and measures (i.e., how many buckets can you fill in a minute).</p> <p>We suggest the new service standard comes into effect at the next determination for each business.</p>
Planned interruption notifications		18.4	<p>We are supportive of this change. GWW typically notifies customers of planned outages through letter drops (i.e., a card). Our database has some emails and mobile phone numbers, but it is not complete, and do use these methods to notify customers of outages.</p> <p>Due to our legacy systems and processes, it is likely to take longer than a few months to implement for us.</p>
Step in clause	-	TBC	GWW supports this inclusion in the code.






GWW submission to ESC customer service code

Final Audit Report

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