

Submission on Draft GSL Document

South Gippsland Water appreciates the time and effort the ESC has afforded this GSL.

In the broad, South Gippsland Water agrees that no customer should face restriction or legal action if they have not had the correct notifications. However, the draft paper, whilst stating, “It should not create an unnecessary administrative burden.” page 5, actually does. Making personal visits and registering mail will be a burden on staffing levels.

Whilst restriction or legal action on a customer is not taken lightly, customers also need to be responsible for their actions and realise there are consequences. South Gippsland Water enters into many arrangements with customers and rarely, if ever, say no to an Instalment Plan, which if honoured, results in no further action being taken.

However, it has previously been mentioned by the ESC that other corporations may not be so generous and with the increase in metropolitan corporations’ tariffs, due to the desalination plant, more stringent steps are required to protect customers who may be facing hardship. This may be true for the metropolitan water corporations, but the ESC must realise, South Gippsland Water and most other regional corporations have not had large tariff increases. South Gippsland Water’s increase is one of the lowest in the State.

The steps shown in Table 1. are “burdensome”, as personal visits can take as long as 3 hours and of course there is no guarantee anyone will be home. For this reason, South Gippsland Water feels if a corporation elects not to make the two telephone calls, they should only be required to make one personal visit and that should be the end of the process. For OH&S reasons, two staff will be required to make such visits and this is an extra 3 hours x 2 staff = 6 hours of extra staff required for one customer.

Alternatively, should the corporation’s attempt to telephone the customer on two occasions without success, South Gippsland Water would be willing to make one personal visit. Nearly all corporations will utilise the telephone option, rather than just making a personal visit – as the telephone option is a much more logical, economic method.

In Step 4, the need to register mail should be removed. South Gippsland Water sends out 4 notices prior to restriction and registering mail would not help in any way. 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, as in some instances they find it difficult to travel to the Post Office (in this region, such a trip can take a half hour drive) or they have other legal matters pending and will not accept any mail which is registered.

As a business, South Gippsland Water only has a 3 month period to issue accounts and then collect monies – to issue a 5th notice in this limited time frame and have it registered would be near impossible. How does signing for a letter help encourage the customer to contact us? If anything, they would more likely be fearful of our business if they were receiving registered mail. South Gippsland Water would like customers to feel the corporation is more approachable, and having customers sign for mail goes against this philosophy. Being so formal and legal with mail does not promote a business as being friendly.

It is supported, that by going and attempting to visit the customer encourages good relations and could open the door to better communication. Meeting a staff member, and then having them as a future contact in the corporation, will help promote better communication.

Even though it may take a 3 hour round trip to make such contact, in the long run this may have benefits in creating open communication. However, one visit is enough, as this is going above and beyond the customer service one would receive from any other business.

The one area which is not adequately addressed is customers who have entered into Instalment Plans. Often such Instalment Plans will remove the customer out of the process in regard to receiving notices. They may not receive a Reminder or a Final Notice and if they falter on an Instalment Plan, the corporation should not be required to issue the previous notices they may have missed out on. The Instalment Plan could simply state, failure to honour this agreement or contact the corporation will result in immediate restriction or legal action. They obviously are aware of their account and contact has been made by entering into the agreement. As stated earlier, the problem is, there is a limited time frame in issuing accounts and then collecting monies.

The steps in the Table also need to be made very clear. The removal of “discretionary” decisions, i.e. Step 4. is suggested, as it creates more confusion and different approaches between corporations should not be encouraged.

Another question which requires clarification is, if a message is left on a telephone, does this count a contact? – this needs to be stated in the Table.

The GSL payment of \$300- is quite hefty, but if someone is inconvenienced due to a failure in the business’s process, the customer should be compensated appropriately.

This may be a lengthy response, but the main three points which need to be readdressed are;

1. Instalment Plans need to be addressed in the Table.
2. Registered mail will make the corporation appear more threatening which goes against South Gippsland Water’s philosophy of being more customer focused and encouraging better communication.
3. No more than one personal visit should be required to be made at any point of time in the process.

South Gippsland Water hopes these amendments will be approved, as the desire by all parties concerned, is to have a system which works and one which promotes good communication.