

18 April 2012

**By email: [water@esc.vic.gov.au](mailto:water@esc.vic.gov.au)**

Water  
Essential Services Commission  
Level 2, 35 Spring Street  
Melbourne VIC 3000

Dear Sir/Madam

### **Hardship Related Guaranteed Service Level Review**

We write to provide our support for the Essential Services Commission's Draft Decision to roll-out the hardship related guaranteed service level, in its current form, to the remaining seven Victorian urban retail water businesses from 1 July 2012.

The data in the Draft Decision that demonstrate the decline in restrictions and legal action for non-payment for the businesses that have already implemented a hardship related guaranteed service level regime is compelling. It is our view that this type of payment provides an incentive for businesses to comply with the requirements of the Water Customer Service Code relating to hardship. The reduction in restrictions and legal action will also amount to cost savings for the water businesses, so we believe this decision can also be justified on economic grounds.

In relation to the checklist, we believe it could be improved at step 4 and 5, by requiring at least one of the attempts of a water business to make personal contact to be outside of business hours. In our view, it is unreasonable to expect that all consumers facing payment difficulties will be at home during the day or that all vulnerable or disadvantaged consumers are unemployed. There is an increasing incidence in the number of consumers who are employed, yet still face difficulties in paying their bills. The current drafting does not address this issue.

Please contact me on 03 9670 5088 or at [gerard@consumeraction.org.au](mailto:gerard@consumeraction.org.au) if you would like to discuss these matters further/have any questions.

Yours sincerely

**CONSUMER ACTION LAW CENTRE**



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