

## Water codes review

### **Submission received through Engage Victoria**

**Date submitted: 25 July 2022**

**Submission written by: Coliban Water**

From 14 June 2022, we began accepting submissions on our Water Customer Service Codes Review: Proposal for amendments to the water customer service codes via Engage Victoria ([www.engage.vic.gov.au](http://www.engage.vic.gov.au)). On this website, people were given the opportunity to send us a response to a set of questions we provided.

#### **What are your views on the draft code?**

Coliban Water commends the Essential Services Commission on its extensive review of the Customer Service Code.

We note several updates which will serve to increase awareness of support available to those experiencing payment difficulties as well as updating communication methods to better accommodate customer preferences and reflect modern operations.

#### **What is your view on our proposed definition for a small business?**

The definition is clear and we see no impediments to implementing this in our operations.

To assist with eligibility for billing support we would suggest that a threshold for turnover be considered, for example less than \$5 million. A consistent definition of small business may also be considered in line with Jobs Victoria, to ensure all government support is consistent.

#### **We are interested in stakeholder feedback about the costs and benefits in reducing the undercharging period in the draft water industry standards.**

The shortening of the period during which water businesses can recover undercharged amounts from 12-months to 4-months is of concern to Coliban Water. In the case of an estimated read being

required to generate the 3-monthly bill, it does not leave a sufficient opportunity to obtain an actual read and correct charges as part of the next billing cycle.

Whilst we acknowledge the intention to align consumer protections with the energy sector, we believe 4-months in energy would typically reflect 4 billing cycles. Water is generally billed on a quarterly basis and therefore 4 billing cycles equates to a 12-month window. In addition, the water industry does not have the penetration of digital meters of the energy sector, and therefore, corrections require one, or multiple site visits.

A feasible change for Coliban Water to implement would be 2 billing cycles or 6 months, whichever is greater.

Any shortening of the undercharging period permitted will require significant operational changes. A transition period would be required. In addition, we request clarification on whether this proposed change would be applied to instances where meters are inaccessible, for example dangerous dog, locked gates or meter inside place of business.

**What is your view on whether our proposed amendments to the reminder and final notices are appropriate?**

Changes in relation to the reminder and final notices are supported by Coliban Water with one exception. The requirement to send a reminder notice no later than two business days after the due date of the bill will result in a significant number of incorrect reminder notices being sent. The reason for this is that it takes 2 to 3 business days for payments made by BPay to be transferred and reconciled within our billing system. Given this external constraint to our operations, Coliban Water would recommend that the requirement be amended to reminder notices being sent no later than 5 business days after the due date of the bill.

**We seek stakeholder feedback on the proposed checklist and whether it meets the varied communication needs of customers.**

The updating of the reasonable endeavours offers water businesses flexibility in terms of meeting the communication needs of our customers. A balance has been struck between flexibility as well as clear expectations in regards to what is required ahead of supply being restricted, or taking legal action. We are satisfied that the proposed checklist will meet the varied communication needs of customers.