




# ANNEX C - Proposed amendments to the *Water Industry Standard – Urban Customer Service*

This table summarises the proposed changes made between the *Customer Service Code - Urban Water Businesses* and the draft *Water Industry Standard - Urban Customer Service*.

Minor proposed changes to terminology are not identified in this table (for example 'code' to 'industry standard' and 'water law' to *Water Act 1989* (Vic) and the *Water Industry Act 1994* (Vic) or '*Water Act 1989* (Vic)').

In order to better reflect a customer's journey, we have included new elements and proposed some minor movements to clauses and sub-clauses. This will be indicated in the table below as 'Moved to'.

**The following icons indicate the status of each clause and sub-clause. If you wish to provide feedback on a specific clause, please refer to the proposed clause number.**

	<b>Change</b>	We have proposed amendments to the content, or created a new clause
	<b>No change</b>	We have not proposed any amendments to content.
	<b>No substantive change</b>	We have proposed to update a clause to ensure it is in plain English, or updated terminology to reflect amendments to other clauses, but there is no substantive change to the obligations.

## Proposed contents of Draft Water Industry Standard – Urban Customer Service

**Part A – Introduction**

**Part B – Service and Supply** (clauses 1 to 7)

**Part C – Customer Assistance and Support** (clauses 8 to 14)

**Part D – Actions for non-payment** (clauses 15 to 16)






**Part E – Quality and Reliability of Services and Supply** (clauses 17 to 21)








**Part F – Customer Charters** (clauses 22 to 24)








**Part G – Definitions**








**Schedule 1 – Service Standards**






**Schedule 2 - Approved GSL Schemes**







Current Clause	Proposed clause	Status	Proposed amendment
Part A	Part A		Part A Introduction  <b>Change:</b> we are proposing to update the commencement paragraph
1	1		Clause 1 – Connection and Service Provision (Part B – Service and Supply)  <b>No change</b>
1.1	1.1		Sub-clause 1.1 - Obligation to provide service (Part B – Service and Supply)  <b>No change</b>
1.2	1.2		Sub-clause 1.2 - Obligation to connect (Part B – Service and Supply)  <b>No change</b>
1.3	1.3		Sub-clause 1.3 - Limits on recycled water services (Part B – Service and Supply)

			<b>No change</b>
2	2		Clause 2 – Charges (Part B – Service and Supply) <b>No change</b>
2.1	2.1		Sub-clause 2.1 – Variation (Part B – Service and Supply) <b>Change:</b> Deleted the first sentence as it is replicated in 1.1 and proposing a requirement for water businesses to notify customers of a variation in charges, five business days before they take effect.
2.2	2.2		Sub-clause 2.2 - Schedule of charges (Part B – Service and Supply) <b>No change</b>
3	14		Moved to Clause 14 - Complaints and Disputes (Part C - Customer Assistance and Support) <b>No change</b>
3.1	14.1		Moved to Sub-clause 14.1 - Complaints and disputes policy (Part C - Customer Assistance and Support) <b>No change</b>
3.2	14.2		Moved to Sub-clause 14.2 - Resolution of disputes (Part C - Customer Assistance and Support) <b>Change:</b> Change of wording from “endeavour” to “use reasonable endeavours” to resolve in good faith any dispute directly with its customers and other affected by its operations.
4	6		Moved to Clause 6 - Billing (Part B – Service and Supply) <b>No change</b>







4.1	6.1		Moved to Sub-clause 6.1 - Billing cycle (Part B – Service and Supply)  <b>No substantive change</b>
4.2	5		Moved to Clause 5 - Meter readings (Part B – Service and Supply)  <b>No substantive change.</b>
-	5.1		This is a new Sub-clause 5.1 - Customer self-reads (Part B – Service and Supply)  <b>Change:</b> we are proposing to outline the requirements for customer-self reads.
4.3	5.2		Moved to Sub-clause 5.2 - Special meter readings (Part B – Service and Supply)  <b>Change:</b> we are proposing that a water business must not charge a fee for special meter readings; customer self-reads or if a customer has a digital meter.
-	5.3		This is a new Sub-clause 5.3 – Data and digital water metering (Part B – Service and Supply)  <b>Change:</b> we are proposing to specify that a water business with digital metering in its network has a policy clearly explaining how data collected from digital water meters is managed and used.
4.4	6.2		Moved to Sub-clause 6.1 - Issue of bills (Part B – Service and Supply)  <b>Change:</b> we are proposing to remove the requirement for a customer to request a bill be sent to their agent or representative, in writing.
4.5	6.3		Moved to Sub-clause 6.3 - Content of bills (Part B – Service and Supply)

			<p><b>Change:</b> we are proposing to clearly specify a water business display the customer's water usage on a bill and ensure bills have a link to where a customer charter can be found.</p>
4.6	6.4		<p>Moved to Sub-clause 6.4 - Explanation of charges (Part B – Service and Supply)</p> <p><b>No substantive change</b></p>
-	6.5		<p>This is a new Sub-clause 6.5 – E- bills (Part B – Service and Supply)</p> <p><b>Change:</b> we are proposing to introduce minimum requirements for an E-bill</p>
4.7	6.6		<p>Moved to Sub-clause 6.6 - Presentation of customer water usage (Part B – Service and Supply)</p> <p><b>No substantive change</b></p>
4.8	6.7		<p>Moved to Sub-clause 6.7 - Adjustment of bills (Part B – Service and Supply)</p> <p><b>Change:</b> we are proposing to reduce the undercharged period to 3 months and also ensure water businesses do not charge interest on undercharged amounts.</p>
5	7		<p>Moved to Clause 7 – Payments (Part B – Service and Supply)</p> <p><b>No change</b></p>
5.1	7.1		<p>Moved to Sub-clause 7.1 - Payment methods (Part B – Service and Supply)</p> <p><b>No change</b></p>
5.2	7.2		<p>Moved to Sub-clause 7.2 - Flexible payment plans (Part B – Service and Supply)</p>







			<p><b>Change:</b> we are proposing to clearly detail the requirements of a flexible payment plan.</p>
-	8		<p>This is a new Clause 8 - Proactive engagement (Part C - Customer Assistance and Support)</p> <p><b>Change:</b> we are proposing to introduce an obligation on water businesses to proactively contact customers experiencing payment difficulties and offer them information and assistance.</p>
-	9		<p>This is a new Clause 9 - Customer's chosen representative or support person (Part C - Customer Assistance and Support)</p> <p><b>Change:</b> we are proposing to specify that a water business must have policies and procedures in place to identify and communicate with a customer's chosen support person or representative.</p>
5.3	10.1		<p>Moved to Sub-clause 10.1 - Payment assistance (Part C - Customer Assistance and Support)</p> <p><b>Change:</b> we are proposing to expand the support that should be made available to customers experiencing payment difficulties.</p>
5.4	10.2		<p>Moved to Sub-clause 10.2 - Customer Support Policy – residential customers (Part C - Customer Assistance and Support)</p> <p><b>Change:</b> we are proposing to replace the word 'hardship' with 'customer support' and add the support measure of suspending the sale of debt for customers receiving support under the policy.</p>
-	10.3		<p>This is a new Sub-clause 10.3 - Customer Support Policy – small business customers (Part C - Customer Assistance and Support)</p>

			<p><b>Change:</b> we are proposing to introduce a requirement for water businesses to have a customer support policy for small business customers.</p>
6	15		<p>Moved to Clause 15 - Actions for non-payment (Part D – Actions for non-payment)</p> <p><b>No change</b></p>
-	15.1		<p>This is a new Sub-clause 15.1 - Appropriate communication (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to introduce a principle for water businesses to ensure collection notices are delivered in language and style that is sensitive and appropriate, with a focus on the support available and encouraging customers contact the water business.</p>
6.1	15.2		<p>Moved to Sub-clause 15.2 - Reminder notices (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to clearly specify the minimum requirements of a reminder notice.</p>
6.2	15.3		<p>Moved to Sub-clause 15.3 - Final notices (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to replace the word ‘warning’ with ‘final’ and clearly specify the minimum requirements of a final notice.</p>
6.3	-		<p>This has removed as no longer relevant</p> <p><b>Change:</b> content has been incorporated into Sub-clauses 15.2 and 15.3 (Part D – Actions for non-payment).</p>
-	15.4		<p>This is a new Sub-clause 15.4 - Communication requirements (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to update and incorporate the hardship related GSL (reasonable endeavours)</p>








checklist into the Water Industry Standard – Urban Customer Service.

6.4	15.5		Moved to Sub-clause 15.5 - Interest on unrecovered amounts (Part D – Actions for non-payment)  <b>Change:</b> we are proposing to clearly state that a water business must not charge interest on unrecovered amounts if the customer is on a payment plan or receiving assistance under the water business’s customer support policy.
6.5	15.6		Moved to Sub-clause 15.6 - Maximum rate of interest that may be charged (Part D – Actions for non-payment)  <b>No substantive change</b>
6.6	15.7		Moved to Sub-clause 15.7 - Charges over property (Part D – Actions for non-payment)  <b>Change:</b> we are proposing to remove the dates that are no longer applicable.
6.7	15.8		Moved to Sub-clause 15.8 - Other charges (Part D – Actions for non-payment)  <b>No substantive change</b>
6.8	15.9		Moved to Sub-clause 15.9 - Dishonoured payment (Part D – Actions for non-payment)  <b>Change:</b> we are proposing to clarify that a water business must not recover costs associated with a dishonoured payment from a customer who is the holder or an eligible concession card or receiving assistance under the water business’s customer support policy.
7	16		Moved to Clause 16 - Actions for non-payment (Part D – Actions for non-payment)  <b>No change</b>


















-	16.1		<p>This is a new Sub-clause 16.1 - Restriction to be a measure of last resort (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to introduce a principle that restrictions should be a measure of last resort.</p>
7.1	16.5		<p>Moved to Sub-clause 16.5 - Restriction and legal action (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to update the conditions that must be met by a water business before it restricts a customer's water supply or takes legal action.</p>
7.2	16.2		<p>Moved to Sub-clause 16.2 - Limits on restriction and legal action (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to increase the threshold amount before a restriction or legal action can be taken to \$300 and to clearly state that a customer receiving any form of assistance under the <i>Water Industry Standard – Urban Customer Service</i> is exempt from restriction and legal action.</p>
7.3	16.3		<p>Moved to Sub-clause 16.3 - Additional limits on restriction (Part D – Actions for non-payment)</p> <p><b>No substantive change</b></p>
-	16.4		<p>This is a new Sub clause 16.4 - Life support and other special circumstances (Part D – Actions for non-payment)</p> <p><b>Change:</b> we are proposing to clearly specify that a water business must not restrict a customer's water supply if they are on any form of life support.</p>
7.4	16.6		<p>Moved to Sub-clause 16.6 - Removal of restrictions (Part D – Actions for non-payment)</p> <p><b>No change</b></p>







8	17		Moved to Clause 17 - Quality of Services (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>
8.1	17.1		Moved to Sub-clause 17.1 - Product quality (Part E – Quality and Reliability of Services and Supply)  <b>No substantive change</b>
8.2	17.2		Moved to Sub-clause 17.2 - Water supply (pressure or flow rate (Part E – Quality and Reliability of Services and Supply)  <b>No substantive change</b>
8.3	17.3		Moved to Sub-clause 17.3 - Water Supply Testing (Part E – Quality and Reliability of Services and Supply)  <b>No substantive change</b>
8.4	17.4		Moved to Sub-clause 17.4 - Water Supply Rectification (Part E – Quality and Reliability of Services and Supply)  <b>No substantive change</b>
9	18		Moved to Clause 18 - Reliability of services (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>
9.1	18.1		Moved to Sub-clause 18.1 - Obligation to provide reliable services (Part E – Quality and Reliability of Services and Supply)  <b>Change:</b> we are proposing to replace the word 'systems' with 'policies'.
9.2	18.2 & 18.3		Moved to sub-clauses 18.2 and 18.3 - Service Standards and Unplanned Interruptions (Part E – Quality and Reliability of Services and Supply)

			<b>Change:</b> we are proposing to update the service standards
9.3	18.5		Moved to Sub-clause 18.5 - Bursts, leaks, blockages and spills (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>
9.4	18.4		Moved to Sub-clause 18.4 - Planned interruptions (Part E – Quality and Reliability of Services and Supply)  <b>Change:</b> we are proposing to add a specific reference to notifying affected customers by their preferred method of communication and if possible, by SMS.
9.5	12		Moved to Clause 12 - Special needs (Part C – Customer Assistance and Support)  <b>No substantive change</b>
10	19		Moved to Clause 19 – Reconnection (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>
11	21		Moved to Clause 21 - Works and Maintenance (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>
11.1	-		This has been deleted as it is no longer relevant
11.2	21.2		Moved to Sub-clause 21.2 - Worker identification (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>

11.3	21.3	⊘	Moved to Sub-clause 21.3 - Keys held by water business (Part E – Quality and Reliability of Services and Supply)  <b>No change</b>
12	13	⊘	Moved to Clause 13 – Information (Part C – Customer Assistance and Support)  <b>No change</b>
12.1	13.1	C	Moved to Sub-clause 13.1 – Enquiries (Part C – Customer Assistance and Support)  <b>No substantive change.</b>
12.2	13.2	⊘	Moved to Sub-clause 13.2 - Fees for information or advice (Part C – Customer Assistance and Support)  <b>No change</b>
12.3	3	⊘	Moved to Clause 3 - Permitted use (Part B – Service and Supply)  <b>No change</b>
12.4	Part A	⊘	Moved to Part A – Introduction  <b>No change</b>
12.5	4	⊘	Moved to Clause 4 - Sustainable use of water (Part B – Service and Supply)  <b>No change</b>
12.6	13.3	⊘	Moved to Sub clause 13.3 - Water reuse (Part C – Customer Assistance and Support)  <b>No change</b>
12.7	13.4	⊘	Moved to Sub clause 13.4 - Billing history (Part C – Customer Assistance and Support)

			<b>No change</b>
12.8	13.5		Moved to Sub clause 13.5 - Regulatory Information (Part C – Customer Assistance and Support)  <b>No change</b>
12.9	13.6		Moved to Sub- clause 13.6 - Communication Assistance (Part C – Customer Assistance and Support)  <b>Change</b> – we are proposing to clearly specify that a water business needs to meet the communication needs of its customers.
-	13.7		This is a new Sub-clause 13.7 - Written communication (Part C – Customer Assistance and Support)  <b>Change:</b> we are proposing to include minimum requirements that written communication is in plain language, legible and presented clearly and appropriately having regard to its nature.
12.10	13.8		Moved to Sub clause 13.8 - Customer Obligations (Part C – Customer Assistance and Support)  <b>No change</b>
12.11	13.9		Moved to Sub clause 13.9 – Privacy (Part C – Customer Assistance and Support)  <b>No change</b>
13	20		Moved to Clause 20 - Guaranteed Service Levels (Part E – Quality and Reliability of Supply and Services)  <b>Change:</b> we are proposing to clearly define the Guaranteed Service Level (GSL) scheme and ensure the communication requirement GSL is incorporated into the <i>Water Industry Standard – Urban Customer Service</i>

14	11		Moved to - Clause 11 - Family Violence (Part C – Customer Assistance and Support)  <b>No change</b>
15	-		This has been deleted as it is no longer relevant
16	22		Moved to Clause 22 - Requirement for Charter (Part F – Customer Charters)  <b>No change</b>
16.1	22.1		Moved to Sub-clause 22.1 - Purpose of Charter (Part F – Customer Charters)  <b>No substantive change</b>
16.2	22.2		Moved to Sub-clause 22.2 - Multiple charters (Part F – Customer Charters)  <b>No change</b>
16.3	22.3		Moved to Sub-clause 22.3 – Consultation (Part F – Customer Charters)  <b>No substantive change</b>
16.4	22.4		Moved to Sub-clause 22.4 - Submission for assessment (Part F – Customer Charters)  <b>No change</b>
16.5	22.5		Moved to Sub-clause 22.5 - Required amendment (Part F – Customer Charters)  <b>No change</b>
17	23		Moved to Clause 23 - Content of Charter (Part F – Customer Charters)  <b>No change</b>

18	24		Moved to Clause 24 - Publication of Charter (Part F – Customer Charters)  <b>Change:</b> we are proposing to change the title to better reflect the content of the entire clause
18.1	24.1		Moved to Sub-clause 24.1 - Availability of charter (Part F – Customer Charters)  <b>Change:</b> we are proposing to change the title to better reflect the intent of this sub-clause.
18.2	24.2		Moved to Sub-clause 24.2 - Summary of Charter (Part F – Customer Charters)  <b>No change</b>
18.3	24.3		Moved to Sub-clause 24.3 - Provision of charter or summary (Part F – Customer Charters)  <b>Change:</b> we are proposing to include a requirement that the charter or summary charter is in a form that is easy to understand for all customers.
18.4	24.4		Moved to Sub-clause 24.4 - Notification of variation (Part F – Customer Charters)  <b>No change.</b>
Part D	Part G		Moved to Part G – Definitions  <b>Change:</b>  We have removed the following definitions as they are no longer applicable – ‘approved service standard’; ‘ESC Act’; ‘GSL rebate’ and ‘water law’.  We have updated the following definitions – ‘business day’; ‘complaint’; ‘enquiry facility’; ‘interruption’; ‘planned interruption’; ‘unplanned interruption’ and ‘water business’.

We have added the following definitions – ‘digital format’; ‘E-bill’; ‘industry standard’; ‘restriction’; ‘sanitary drain’; ‘self – read’; ‘small business customer’; ‘Statement of Obligations’; ‘usage only payment plan’; and ‘Utility Relief Grant’.