

Water codes review

Submission received through Engage Victoria

Date submitted: 26 July 2022

Submission written by: North East 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). 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 our draft code?

Thank you for the opportunity to respond to the draft code. Overall the Service Code Review supports a range of measures that align with our current or planned approach to supporting customers.

We seek additional clarification though on p. 39 for the proposed changes to the Guaranteed Service Level measures in the table. The proposed changes to GSL does not have a proposed target to go along with the measure to be able to provide any meaningful feedback. The current targets do not work with the proposed measures and targets have not been revised in 'Schedule 1 – Service Standards' of the draft 'Water Industry Standard – Urban Customer Service' document. Suggest more consultation is required with water businesses in amending these targets to the proposed measures.

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

The proposed definition for small business seems to be reasonable, noting the varying water usage by differing small businesses makes usage a non-viable definition.

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

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The aim to align this with the energy sector seems to be a reasonable approach, noting the requirement for a transition period that allows time for water businesses to transition to this changed time frame.

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

As a water business that is transitioning towards no restriction notices for residential customers we are supportive of the ESC move towards a reasonable endeavours approach and the checklist provided.

However, we wish to confirm that the statement on p. 26 which outlines that 'a reminder notice be sent to the customer no later than two business days...' we believe should read 'no earlier'.

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

We already aim to provide varied communication options with customers, however, the approach outlined seems to be reasonable.