



protecting busselton's water

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BUSSELTON WATER

Our ref : CU13 (D13/4824)
Your ref :
Enquiries : Julie Rawlings

27th September, 2013

David Leath
A/Assistant Director Customer Protection
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear David,

Re: Financial Hardship Policy Guidelines for Water Services – Request for Comment

Thank you for the opportunity to comment on the Guidelines proposed by the ERA. Busselton Water's comments are noted below:

Clause 5.1 Alternative Payment Arrangements

The third paragraph states "In particular, a licensee should **ensure** that any payment arrangement does not over or under commit the customer".

It is unreasonable for a licensee to be able to 'ensure' that a payment arrangement will not over or under commit the customer. While consideration of payment arrangements would be made in consultation with the customer and supported by account history etc., a licensee can only undertake their best endeavours in this regard. It is recommended that this sentence be reworded.

Clause 5.7.5 A word is missing in this sentence. "How the licensee <promotes> its hardship policy to its customers and other relevant agencies".

I would also like to make the comment that the footnotes, checklist and template contained within the guidelines were most helpful.

Yours faithfully,

Julie Rawlings
Manager, Customer Services