



3rd November 2016

Ms Nicola Cusworth
Chair
PO Box 8469
Perth BC WA 6849

Dear Ms Cusworth,

RE: Consultation Paper for Water Services Code of Conduct (Customer Service Standards) 2013

The Joint Utilities (JU) group consisting of Water Corporation, Aqwest and Busselton Water would like to thank Economic Regulatory Authority for the opportunity to provide comment on the proposed amendments to the *Water Services Code of Conduct (Customer Service Standards) 2013*.

On a general note the JU group consider the Code has been operating effectively since commencement in November 2013 and does not require major changes.

The JU group has also identified some specific matters of common concern which we wish to comment on as follows:

3.3 Clause 4 (1) Application of Code.

The definition of "customer" under this clause is inconsistent with definitions in the Water Services Act 2012. JU requests the Code be amended to ensure full alignment with the Act. JU group's main concern here is to protect the critically important provision in Clause 126 of the Act which ensures debt liability continues to remain with the property and ultimately the "land owner".

9.5 Service Standard Payments (Issue No. 55)

All water corporations currently undertake a best practice approach to customer service and strive to excel in meeting our obligations. Mechanisms such as licence audits, ombudsmen process, reporting to the Minister and direct engagement with customer advocacy groups are in place to ensure a high level of accountability. JU is not convinced that the introduction of service standard payments, which will translate to an added cost to customers, is warranted or will deliver an improved level of customer service or enhance process efficiency and therefore oppose this proposal.

Clauses 5.4 to 5.15 Payments for Water Service

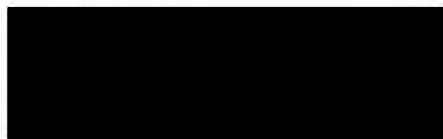
The current Financial Hardship Policy (FHP) regime has worked very well as a license requirement supported by guidelines and JU considers the FHP policies have provided a great level of protection for vulnerable customers including tenants. JU does not support bringing greater prescription and less flexibility to the guidelines by bringing them into the Code with no obvious improvement to customer service levels or efficiency.

Clauses 4.4 to 4.10 Information on Bills

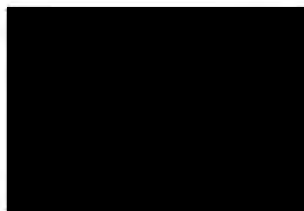
JU is opposed to more prescribed information on bills which we wish to keep as simple as possible and focussed on their intended purpose as a water invoice. Digitalization via multiple media mediums is a superior method for information delivery, rather than over complicating/overcrowding a Water Invoice with code regulation

Thank you again for this valuable opportunity for input and JU looks forward to participating in the remainder of the review process.

Yours faithfully,



Ms Sue Murphy
Chief Executive Officer
Water Corporation



Mr Gary Hallsworth
Acting Chief Executive Officer
Aqwest



Mr Chris Elliott
Chief Executive Officer
Busselton Water