



Enquiries:
Telephone:

4 November 2016

Ms Nicky 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

Thank you for the opportunity to provide comment on the proposed amendments to the *Water Services Code of Conduct (Customer Service Standards) 2013*. We have provided our response to each of the 56 proposed amendments within the body of your Consultation Paper.

As previously advised, the Joint Utilities (JU) group, which consists of Water Corporation, Aqwest and Busselton Water, has provided comment on specific matters of common concern which are also included in our response attached.

The Code has been operating effectively since November 2013 and, while there will always be opportunities to improve it and adjust to changing or emerging customer needs, we believe it does not require significant change at this time.

Thank you again for the opportunity to provide input and we look forward to participating in the remainder of the review process.

Yours sincerely



Sue Murphy
Chief Executive Officer
Water Corporation

1 Executive Summary

The Water Act requires the ERA to undertake a review of the operation and effectiveness of the Water Code (**Attachment 1**) at least once every five years. The Water Code commenced on 18 November 2013.

The ERA began the first review of the Water Code in July 2016. This Consultation Paper presents the ERA's preliminary findings. In drafting the Consultation Paper, the ERA sought the advice of the Water Code Consultative Committee (**WCCC**).

The WCCC is a statutory committee established by the ERA under the Water Act. The role of the WCCC is to advise the ERA on matters relating to the Water Code. Its members include representatives from consumer organisations, industry and government.

This Consultation Paper includes a number of proposals to add new provisions, and amend or delete existing provisions of the Water Code.

It also includes a number of questions on which comment is sought.

Following the closure of the public consultation period, the ERA will seek the advice of the WCCC on any submissions received.

The ERA will consider both the WCCC's advice and the submissions received before issuing its Draft Decision.

The ERA's Draft Decision will be subject to public consultation. Once the public consultation period has ended, the ERA will seek the WCCC's advice on both the Draft Decision and any submissions received.

Consideration will be given to both the WCCC's advice and the submissions received before the ERA makes its Final Decision.

The ERA seeks feedback on the following issues:

Issue 1

Proposal To amend clause 1 by replacing "2013" with "2017".

WC Response: Agreed.

Issue 2

Proposal To amend clause 2 for the Code to come into operation on 1 July 2017.

Comment sought A. Should any of the proposed amendments in this Consultation Paper take effect after 1 July 2017?

WC Response: dependent on the amendments made, there may be significant process and system requirements (e.g. changes to bill formats) which may prevent compliance by 1 July 2017. Provided Licensees were given an amnesty for significant process or systems changes for a period, as negotiated and agreed with the ERA, an effective date of 1 July 2017 would be acceptable for other amendments.

- B. If so, which amendments should commence later and when should those amendments commence?

WC Response: See comment 2A

Issue 3

Comment sought

- A. Currently, the Water Code applies to all customers. Should the application of the Water Code be limited to certain customers only?

WC Response: The code should apply to all customers who receive a “standard service” as defined in the Licensees’ Water Services License. Therefore, customers who receive a “Service by Agreement”, or other contractual arrangement, or Purple Pipe Schemes or Non-Potable supply should be exempted from certain requirements of the Code, but perhaps not all provisions of the Code.

- B. If so, to which customers should the Water Code apply?

WC Response: See comment 3A

Issue 4

Comment sought

- A. Currently, the Water Code applies to all licensees. Should the Water Code differentiate between certain licensees?

WC Response: There are already existing requirements within the Code which do not apply to all Licensees. For example Clauses 24(2)(3)(4)(5) relate only to the Water Corporation, while Clause 24(6) relates to all Licensees other than the Water Corporation. This is working effectively from the Water Corporation’s perspective. Any exemptions must be recorded within the Code.

- B1 If so, on what basis should the Water Code differentiate between licensees? For example, on the basis of the location of the licensee’s customers or the number of connections supplied by the licensee?

WC Response: See comments 4A.

- B2 If so, should these licensees simply be exempt from some of the provisions of the Water Code, or should one or more service standards be amended?

WC Response: See comments 4A.

Issue 5

Comment sought

- Should the Water Code apply to the provision of irrigation or drainage services?

WC Response: The Code should not apply to irrigation and drainage services. Irrigation services are highly variable so it is inappropriate to apply the Code to them. WC have supply agreements for irrigation bulk water and in some cases a Customer Charter. WC is a minority drainage provider, local governments are the main providers but are exempt from drainage licensing and not subject to the Code. It is

inequitable for minor providers to be subject to the Code while major providers are exempt. Additionally:

- drainage is designed to prevent flooding (it is not regulated through the planning system).
- drainage infrastructure is communal and is fundamentally different to the minimum service levels outlined in the Code.

Issue 6

Comment sought

- A. Should clause 5 be amended to only apply to business customers? In this case, licensees and business customers could continue to contract out of all of the provisions of the Water Code. Licensees and residential customers would not be able to contract out of provisions of the Water Code.

WC Response: Clause 5 should remain available to all customers and not be limited to business customers only. There are situations (e.g. some rural lots) where residential customers will receive a non-standard service and thereby be served by a “Service by Agreement”.

- B. Should clause 5 be amended to only apply to certain provisions of the Water Code? In this case, licensees and both business and residential customers could only contract out of specific provisions of the Water Code.

WC Response: Contracting out of certain provisions of the Code is a better customer outcome than wholesale exemption from the Code. See comments 3A and 4A.

- C. Should clause 5 be amended so that licensees and business customers can contract out of all provisions of the Water Code, whilst licensees and residential customers can only contract out of specific provisions of the Water Code?

WC Response: Clause 5 could be amended such that only Licensees and customers supplied under contractual agreements can contract out of the Code.

Issue 7

Comment sought

Should licensees who send usage bills for drinking water be required to issue a fixed charges bill at least once every six months (or more often if the billing cycle is changed, see issue 8)?

WC Response: WC currently send a combined service charges and water usage bill two monthly. WC currently gives customers the option of being billed annually for services charges in advance.

Issue 8

Comment sought

Should the maximum interval between bills for usage be reduced to three, or alternatively four, months?

WC Response: WC currently send a combined service charges and water usage bill two monthly. It should be acknowledged however, that the cost of system and process changes to move to combined two monthly billing were high.

Issue 9

Comment sought Should licensees be required to read a customer's water meter at least once every 12 months?

WC Response: WC's current position is to aggressively pursue a physical reading after two consecutive estimations. Smart metering technologies will make this Clause redundant.

Issue 10**Proposal**

To require a licensee to include the following additional information on each bill:

- information about assistance for customers experiencing payment difficulties or financial hardship;
- for bills issued to residential customers, information on the availability of interpreter services;
- the total amount of any payments made by the customer since the previous bill was issued;
- a telephone number for complaints;
- the Freecall telephone number for the Energy & Water Ombudsman WA; and
- a 24 hour telephone number for faults and emergencies.

WC Response: Printing and stationary costs are significant for the WC and as such bill formats are carefully managed. Of the requirements listed above, only ***the total amount of any payments made by the customer since the previous bill was issued*** is currently not included on our bills.

This requirement is introducing more detailed information normally delivered by an account statement as opposed to an invoice (bill). WC's position is that this will add unnecessary complexity to the bill, particularly if the bill includes adjustments, concessions, and multiple payments. The bill (invoice) should be limited to balance brought forward, current charges (and adjustments if applicable) and total amount owing.

WC position is that account statements are available as a self-service option on the MyWater customer portal (as per the example below) or by hard copy on request.

mywater

Welcome [redacted] | Contact Us | Sign out
You are signed up for paperless billing

Home | My bills and payments | My water use | My details | My property information | Help

Bill and payment history ?

Bill and payments for: [redacted] Account number: [redacted]

Refine details for your account

Date Range: Enter date range
OR Between: 28/4/2016 - 28/10/2016
Show me: Bills Payments
Please note: We can only return bill details from the date you first registered for My Water. Payments may take up to three business days to appear in My Water. **SEARCH**

10 records were found < previous 1 next >

Date	Transaction type	Bill ID	Bill type	Due date	Bill amount	Payment
25/10/2016	Payment received				\$0.00	\$129.30CR
14/09/2016	Bills issued to me	0138	Water Use and Service Charge Account	30/09/2016	\$232.47	\$0.00
11/08/2016	Payment received				\$0.00	\$100.00CR
18/07/2016	Payment received				\$0.00	\$205.00CR
14/07/2016	Bills issued to me	0137	Water Use and Service Charge Account	01/08/2016	\$239.12	\$0.00
23/06/2016	Payment received				\$0.00	\$100.00CR
08/06/2016	Payment received				\$0.00	\$100.00CR
11/05/2016	Bills issued to me	0136	Water Use and Service Charge Account	27/05/2016	\$263.68	\$0.00
06/05/2016	Payment received				\$0.00	\$100.00CR
28/04/2016	Payment received				\$0.00	\$100.00CR

10 records were found < previous 1 next >

[Extend due date](#) [Make a payment](#) [Ways to pay your account](#) [Need help with payments?](#)

Issue 11**Comment sought**

Should each bill have to specify the charges payable for each of the water services provided by the licensee?

WC Response: Consistent with WC's current bill format.

Issue 12**Proposal**

To require a licensee to include a statement on the bill that interest charges or late payment fees may apply (if the licensee charges interest or late payment fees for outstanding amounts).

WC Response: Consistent with WC's current bill format.

Issue 13**Comment sought**

Should a licensee be required to include the meter reading on a customer's bill (where available)?

WC Response: Consistent with WC's current bill format.

Issue 14**Comment sought**

A. Should each bill from a licensee that has different tariffs based on consumption have to include the applicable tariff(s) for the water services provided?

WC Response: Consistent with WC's current bill format.

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- B. Should each bill from a licensee that has different tariffs based on consumption specify when a customer will move to a higher tariff, or revert back to the lowest tariff (that is, the anniversary date of the customer's billing year)?

WC Response: This would provide valuable information for the customer. This is not currently included in WC's current bill format and would require system changes..

Issue 15

Proposal

To clarify that a bill must include information, where available, about the customer's water usage compared with the customer's usage for the previous account period, and for the same period last year.

WC Response: Consistent with WC's current bill format.

Issue 16

Comment sought

Should clauses 12(3)(b), (c) and (d) be retained as is; amended to require less detailed information to be included on the bill; or deleted?

WC Response: Clause 12(3)(b)(c)(d) be deleted.

Proposal

- A. To clarify that clause 12(3)(a) to (d) only applies to bills for usage for a metered water service.

WC Response: See comment 16 above.

- B. To clarify that clause 12(3)(c) only applies to bills based on an estimate.

WC Response: See comment 16 above.

- C. To delete clause 12(3)(f) if the ERA decides that all bills should include the licensee's telephone number for complaints and the Energy & Water Ombudsman WA's Freecall telephone number.

WC Response: Clause 12(3)(f) be deleted as this information is currently included in WC's bill format.

Issue 17

Comment sought

Should the 12 month limitation on recovering an undercharge only apply where the undercharge is a result of an error by the licensee?

WC Response: In the event that the undercharge is as a result of fraud or illegal use by the customer, the Licensee should be able to recover the undercharge subject to the statute of limitations.

Issue 18

Proposal

To require a licensee to credit an overcharged amount to a customer's account if the licensee has not received instructions from the customer.

WC Response: Consistent with current process.

Issue 19**Proposal**

To require a licensee to offer Centrepay as a bill payment method only to residential customers

WC Response: Consistent with current process.

Issue 20**Comment sought**

Should the requirement to offer direct debit as a payment method be removed from the Water Code?

WC Response: Direct Debit should be retained as a payment option.

Issue 21**Comment sought**

Should licensees be required to obtain the express consent of the holder of the account to be debited before receiving a bill payment by direct debit?

WC Response: Current practice in digital business is to accept the direct debit account on presentation without expressed consent from the account holder. Examples such as mobile phones, Pay for TV and Internet Service Providers are good examples of customer acceptance of DD.

Issue 22**Comment sought**

- A. Should additional requirements be included in the Water Code regarding the process a licensee must follow when assessing whether or not a customer is experiencing payment difficulties?

WC Response: WC has well established processes for dealing with customers with payment difficulties and the principles of payment arrangements are regulated. We encourage customers to contact us then assess if the customer is in payment difficulties or in financial hardship and offer an appropriate payment plan. Regulations allow the discretion to give an interest free payment plan or a payment plan with an interest charge.

- B. If so, what additional protection should be provided to water customers?

WC Response: See comment 22A.

Issue 23**Comment sought**

Should licensees be allowed to charge fees or interest on payment plans offered to customers experiencing payment difficulties?

WC Response: See comment 22A.

Issue 24**Proposal**

To amend clause 25(2) by requiring a licensee to offer a customer experiencing payment difficulties a payment plan or other arrangement.

WC Response: To mandate that payment plans must be offered may drive an increase in payment plans from customers who “won’t pay” as opposed to those who “can’t pay”.

Issue 25

Comment sought

Should licensees be required to review their financial hardship policies if directed to do so by the ERA?

WC Response: Given the requirements of clauses 26(1)(2) that a Licensee must have an ERA approved Financial Hardship Policy and that the ERA provide the guideline template for that policy, it seems logical that the ERA may request a review of the policy.

Issue 26

Proposal

To require a licensee to consult with relevant consumer organisations when developing their initial financial hardship policy.

WC Response: Consistent with WC’s current process.

Issue 27

Proposal

To require a licensee to submit an amended financial hardship policy to the ERA for its approval.

WC Response: Consistent with clause 26(2).

Issue 28

Comment sought

A. Should the content requirements for financial hardship policies remain in the Water FHP Guidelines, or be moved to the Water Code?

WC Response: Content requirements for FHP should remain in the Guidelines and not be moved into the Code.

B. Should a sub-set of the content requirements for financial hardship policies be moved from the Water FHP Guidelines to the Water Code?

WC Response: All content requirements for FHP should remain in the Guidelines and not be moved into the Code.

C. Should financial hardship policies include any information in addition to what is currently required under the Water FHP Guidelines?

WC Response: The FHP is operating effectively and at this stage no required amendments have been identified.

Issue 29

Proposal

To move the requirement for licensees to comply with the Water FHP Guidelines from the water licensee template to the Water Code.

WC Response: Question the need for them to be in both the License and the Code, so perhaps this is an administrative edit rather than a change to requirements.

Issue 30**Comment sought**

- A. Should additional requirements be included in the Water Code regarding the process a licensee must follow when assessing whether or not a customer is experiencing payment difficulties?

WC Response: See comment 28A. Process should be left in the FHP not moved into the Code.

- B. Should additional requirements be included in the Water Code regarding the assistance a licensee must offer customers in financial hardship? For example, should licensees have to offer a customer a choice between a payment plan and other arrangement; should licensees be required to take certain matters into account when setting a payment plan; and should licensees be required to provide certain information to customers about their payment plan?

WC Response: WC has well established processes for dealing with customers experiencing payment difficulties and the principles for payment arrangements are regulated. Customers have many payment options including regular instalments by Direct Debit.

Issue 31**Proposal**

To require a licensee to offer a customer experiencing financial hardship a payment plan or other arrangement.

WC Response: the “offer” of a payment plan may be one of many options suitable for a customer experiencing financial hardship. Customers’ needs will be determined through quality conversations. Licensees need to be given the flexibility to deal with customers on a case by case basis and apply the best fit solutions for the customer’s circumstances.

Issue 32**Proposal**

To require a licensee to review a payment plan upon a customer’s request. If the review demonstrates that the customer is unable to meet its obligations under the existing payment plan, the licensee must revise the payment plan.

WC Response: Existing credit management processes review the status of payment plans. This process, or through contact by the customer, will generate a review of the plan if it is proving difficult for the customer. Payment Plans must also consider accruing and future charges so there must be caution in reviewing a plan down to a level where the debt will continue to grow. Customers are advised when a payment plan is in arrears by 14 days and asked to rectify the default or contact the WC.

Issue 33**Proposal**

To include the words ‘as to whether or not’ in clause 29(c) so it is consistent with the wording of clause 29(b).

WC Response: Agreed.

Issue 34**Proposal**

- A. To require a licensee to give a customer a reminder notice prior to taking action for non-payment of a bill.

WC Response: Consistent with WC current process.

- B. To require a reminder notice to include the following information:
- the licensee's telephone number for account, payment and general enquiries; and
 - advice that a licensee may assist if the customer is experiencing payment difficulties or financial hardship.

WC Response: Consistent with WC current process.

Issue 35**Proposal**

- A. To require a licensee to give a customer written notice of its intention to reduce the customer's water supply.

WC Response: Consistent with WC current process.

Additionally Clause 31 to be amended to include A licensee must not, under section 95(1)(b), reduce the rate of flow of a supply of drinking water to a customer without having first used its best endeavor's to inform the customer in person, by written notice or letter, by telephone or electronic means, of its intention to do so if the amount owing is not paid.

- B. To require a licensee to give a restriction notice to a customer at least 7 days before the licensee intends to reduce the customer's water supply.

WC Response: Consistent with WC current process.

- C. To require a restriction notice to include the following information:
- the matter giving rise to the impending reduction;
 - the earliest date the licensee may reduce the customer's water supply;
 - the existence and operation of the licensee's complaint handling process;
 - the existence and operation of the water ombudsman, including the Freecall telephone number for the water ombudsman; and
 - the applicable restoration procedures, including any costs for restoring the customer's supply.

WC Response: Will require some enhancement to WC current process and system changes. Much of this information is provided to customers in the credit management processes leading up to a restriction notice.

Issue 36**Proposal**

- To amend the wording of clause 32(c) so it is consistent with the wording of clause 32(b).

WC Response: Agreed.

Issue 37**Proposal**

To clarify that a customer's rate of flow of drinking water may not be reduced at any time on weekends, public holidays and the day before a public holiday.

Comment sought

- A. Should the prohibition on reducing the rate of flow of drinking water be extended to anytime on a Friday?

WC Response: Workflow management for unmanned country towns is already an operational challenge and this would be a further restriction to available hours.

- B. Should the prohibition on reducing the rate of flow of drinking water be extended to after 3pm Monday to Thursday?

WC Response: See comment 37A

Issue 38**Comment sought**

- A. Should the term 'complaints' in clause 32(e) only relate to complaints made to the licensee, or also include complaints made to an external dispute resolution body?

WC Response: Clause 32(e) should apply to all complaints including those made to the Energy and Water Ombudsman WA.

- B. If clause 32(e) is amended to specifically refer to complaints made to an external dispute resolution body, should restriction only be allowed if the external dispute resolution body has notified the licensee of the complaint?

WC Response: Agreed.

Issue 39**Comment sought**

- A. Should a licensee only be precluded from reducing a customer's rate of flow of drinking water if the customer has notified the licensee that the customer requires water to operate a life support machine?

WC Response: Consistent with WC current process, monthly notification is received from WA Home Therapies for all persons on hemodialysis. Reliance on the customer to provide this information could be problematic.

- B. Should a licensee be obliged to register customers who require a life support machine?

WC Response: see comment 39A

- C. If so, should the Water Code also provide for a deregistration process?

WC Response: see comment 39A

- D. Should the Water Code include a definition of a life support machine?

WC Response: the generic term of “life support machine” is adequate.

- E. If so, what should that definition be?

WC Response: see comment 39D

- F. Should the Water Code include protections for persons, other than the customer, who reside at the customer’s address and require a life support machine?

WC Response: Restriction would be at property level so all customers residing at that property would be protected.

- G. Should a licensee be required to provide customers who require a life support machine with written notice of planned interruptions to supply at the supply addresses?

WC Response: Needs to be consistent with the notification process for all planned interruptions. Refer to proposal 55.

- H. If so, how much notice should be provided?

WC Response: see comment 39G and refer to proposal 55.

- I. Should a licensee be required to contact customers who require a life support machine as soon as possible in the event of an unplanned interruption?

WC Response: Consistent with WC current process.

Issue 40

Comment sought

Should a licensee be precluded from reducing a customer’s rate of flow of drinking water on a day there is a total fire ban in the local government area in which the customer is located?

WC Response: Supported in principle.

Issue 41

Comment sought

Should licensees be prevented from reducing the rate of flow of drinking water if a customer has applied for a concession or grant and the licensee has not yet made its decision?

WC Response: Supported in principle.

Issue 42

Proposal

To replace the reference in clause 35(2) to AS ISO 10002-2006 with AS/NZS 10002-2014.

WC Response: Agreed.

Issue 43**Proposal**

- A. To delete the requirement that a licensee's complaints procedure must state that a customer may, but does not have to, use the licensee's complaints procedure before or instead of the Energy and Water Ombudsman WA's procedures.

WC Response: Consistent with WC current process.

- B. To delete the requirement that a licensee's complaints procedure must set out the benefits to the customer if the customer chooses to use the licensee's complaints procedure before or instead of the Energy and Water Ombudsman WA's procedures.

WC Response: Supported in principle.

Issue 44**Comment sought**

- A. Should a licensee be required to advise the customer of their right to raise their complaint with the Energy and Water Ombudsman WA if the customer is not satisfied with the outcome of the licensee's process?

WC Response: Consistent with WC current process.

- B. If so, should a licensee be required to provide the customer with the Energy and Water Ombudsman WA's Freecall telephone number?

WC Response: Consistent with WC current process.

Issue 45**Comment sought**

- A. Should a licensee be required to have in place an escalation process which allows a customer to request that their complaint be considered by a senior employee?

WC Response: Consistent with WC current process.

- B. If so, should a licensee be required to advise customers, when responding to a complaint, of their right to have their complaint considered by a senior employee?

WC Response: Consistent with WC current process.

Issue 46**Comment sought**

- A. Should the Water Code specify when a complaint is considered to have been resolved?

WC Response: Defining when an enquiry or complaint is resolved is problematic as a customer may, and has the option to, make further contact or escalate the complaint at any point. A complaint made be considered resolved from the Licensees' perspective as the customer appeared satisfied with the actions taken only to have it reopened at a later date.

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- B. If so, should it only relate to certain complaints (for example, complaints relating to non-payment)?

WC Response: See comment 46A.

Issue 47

Comment sought

Should a licensee be prevented from recovering an amount of money that is in dispute until such time that the dispute has been resolved?

WC Response: There may be situations where recovery of the debt is the only action available for final resolution of the dispute.

Issue 48

Proposal

- A. To clarify that personal account information includes a customer's billing and usage data.

WC Response: Consistent with WC current process.

- B. To clarify that information provided under clause 36(2) must be provided free of charge.

WC Response: Some charges are provided for in Regulations and applied if there is a considerable effort in meeting the information request (e.g. charges and payments over 7 years for taxation purposes). Charges may also apply for Freedom of Information requests. Customers are advised of the charge before proceeding.

Comment sought

Should licensees be allowed to charge for the provision of billing and usage data if the data relates to a period over two years prior to the date of the request?

WC Response: See comment 48B.

Issue 49

Proposal

To clarify that a customer who has been offered a payment plan should only have their water supply reduced if the customer has failed to accept the plan within a prescribed timeframe.

WC Response: Payment Plans are available and negotiated with customers on request. Through their establishment there is an implied acceptance by both the Licensee and the customer. If the customer defaults from the plan further recovery action may be undertaken. Customers should be obligated to contact the Licensee if they are experiencing difficulty with the plan.

Comment sought

How many days should customers be given to inform the licensee whether or not they accept a payment plan?

WC Response: See comment 49.

Issue 50

Comment sought

Should licensees be required to make electronic copies of the Water Code available on their website?

WC Response: The Code should be available through the ERA or State Law Publisher with relevant links from the Licensees' website. Document control issues may occur if available direct from the Licensees' website.

Issue 51

Comment sought

Should licensees be required to have a policy that deals with minimizing the impact of bursts, leaks, blockages and spills?

WC Response: Not supported, response times to faults, minimising impact to customers, property, and the environment, providing information to affected customers and prompt restoration and recovery are already subject to Health, Allocation and Environmental regulation. Embedding a requirement for a Policy within the Code is unnecessary and will not drive any process change or improvement. WC have published "what you can expect as a Water Corporation customer" on our public website.

Issue 52

Proposal

A. To require a licensee to provide at least 48 hours' prior notice of a planned interruption.

WC Response: Current process is to provide a minimum 24 hours' notice. WC aspires to exceed this when operational conditions allow.

B. To allow licensees to provide notice of a planned interruption by post, television or radio, in a newspaper circulating in the affected area, or via electronic means.

WC Response: Notifications should be allowed by any means, include notification of outages on the WC's public website.

Issue 53

Comment sought

Should a new clause be included in the Water Code which requires a licensee to establish a 24 hour telephone number for faults and emergencies?

WC Response: WC currently operates a 24/7 Statewide Operations Centre which includes a 24 hour response for faults and emergencies.

Issue 54

Comment sought

Should licensees be required to advise their customers of tariff changes as soon as practicable, but no later than on the customer's next bill?

WC Response: Consistent with WC's current process of advising customers of tariff changes through the billing process, the Watermark newsletter and the public website.

Issue 55**Comment sought**

- A. Should service standard payments be introduced into the Water Code?

WC Response: Not supported, service levels to our customers are driven by our Customer Service Strategy and our vision of “we’re right for our customers”. We excel in meeting our obligations and in many areas deliver service levels in excess of our regulatory requirements. We do not believe that service standard payments will deliver an improved level of customer service or enhance process efficiency and will generate additional operational costs.

- B. If so, which service standard payments should be included in the Water Code?

WC Response: See comment 55A.

- C. Should licensees be given until 1 July 2018 to implement those service standard payments?

WC Response: See comment 55A.

- D. Should licensees only be required to make payment upon application by an eligible customer?

WC Response: See comment 55A.

- E. Should licensees be required to advise their customers at least once a year of the service standard payments available?

WC Response: See comment 55A.

Issue 56**Comment sought**

- A. Should the Water Code include restrictions on when a licensee can charge interest and/or late payment fees?

WC Response: Interest and other charges are regulated and therefore should be excluded from the Code.

- B. If so, what should those restrictions be?

WC Response: See comment 56A