

From: Siobhan Meerman [REDACTED]
Sent: Tuesday, 17 October 2017 2:34 PM
To: publicsubmissions
Subject: Submission for Draft Decision - 2016-17 Review of the Water Services Code of Conduct (Customer Service Standards) 2013

Good afternoon,

The Financial Counsellors of Midlas reviewed the Draft Decision for the review of Water Services Code of Conduct and wished to make the following submission:

Payment plans for concession customers

P. 176: We firmly agree that licensees must take into account the customer's capacity to pay and consumption history when setting the conditions of a payment plan or other arrangement. The alternative of not doing so puts the customer at risk of a 'doomed to fail' arrangement and worsening their situation.

We support maintaining the rebate when a payment plan is in place as often those most in need of the rebate will have the least money and the most instability in their finances. This also means that repairing arrears is likely to take much longer than, for eg, 50 days. In support of this, we urge that the Code also require licensees to not penalise these customers, within reason, for broken arrangements.

Inconsistencies with the Local Government Act 1995

p. 50: With regard to the delivery of notice to the address of the owner, we agree that the Local Government Act should prevail.

With regard to the ability to *not* offer a payment arrangement while an amount is outstanding from the previous year, we strongly object. This seems to run counter to p.176 above. People's financial health does not maintain itself neatly to either side of the financial year, particularly for those receiving concessions. We respect the need to protect licensees from serial non-payment but foresee this proposal to disproportionately and negatively affect concessional customers.

Maximum billing cycle for bills for usage charges: clause 10(2)

p. 65: We support the reduction of the billing cycle for usage charges from 6 to 4 months. We recommend the consideration by licensees to consider low to no-cost ways to increase usage billing cycles such as digital bills, estimated usage between 4 month periods, etc. We share the concern of the ERA that problematic leaks are often detected only when a bill is issued but respect the costs facing licensees. We propose a compromise whereby longer billing cycles are offset by leak allowances based on historical usage for affected customers.

Charging fees or interest on a payment plan

p. 147: We are concerned that a 'default position' of fees/ interest will put vulnerable customers in a worse position. We are also concerned that not all such customers are detected, as they will pay for water at the cost of their mortgage or food etc. We urge that the Code consider such language as 'customers identified as being in financial hardship must have fees and/or interest waived'.

No reduction if a customer has applied for a concession

p. 257: Language is unclear. Is it for concessions within the licensee’s power to grant only or does it include the waiting period when customers have applied for concession cards as issued by the Australian Government? If the latter, what are the guidelines of length of time to wait/burden of proof?

No reduction on day of a total fire ban

p. 269: We raise the issue that clients who have already been restricted prior to a total fire ban face the same issue of those being actively restricted on that day. We therefore raise the question of whether those previously restricted are to be unrestricted on those days?

Looking to prevent reduction for those applying for concessions or other financial relief with no decision made yet.

Bursts, leaks, blockages and spills

p. 286: What is the purpose of a ‘policy to inform customers of their rights’ if those customers don’t actually have any rights because the licensee is not obliged to comply with their own policy? We suggest revising the wording to include an obligation of the licensee to ‘make every reasonable effort’ to comply with their own policies.

All others matters:

Anything not specifically addressed above was generally supported. Thank you to all involved for your time and hard work.

Kind regards,



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I acknowledge I am working in Whadjuk country and pay respect to Elders and all Noongar people, past and present.

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