

Iron ore  
152-158 St Georges Terrace  
Perth 6000  
Western Australia  
T + 61 (8) 9327 2000

**Private and confidential**

Att: Alex Kroon  
A/Assistant Director, Utility Services Regulation  
Economic Regulation Authority  
Level 4, 469 Wellington Street  
PERTH WA 6000

31 May 2023

Our reference: RTIO-0999428

Dear Alex

**Rio Tinto Iron Ore submission to Consultation Paper of the 2023 Review of the Water Services Code of Conduct (Customer Service Standards) 2018**

Thank you for the opportunity to provide a submission on the above Consultation Paper.

Rio Tinto (through Hamersley Iron Pty Ltd and Robe River Mining Co Pty Ltd) is a licensed Water Services provider under the *Water Services Act 2012*, providing potable water and sewerage services to Dampier, Tom Price, Paraburdoo, and Pannawonica.

In this capacity, Rio Tinto is directly affected by proposed changes to the *Water Services Code of Conduct (Customer Service Standards) 2013 (Water Code)* and this submission outlines our position on issues of key importance.

**Key Issues**

Part 1 of the Code - Preliminary

1. *Issue 1: Clause 3 – Definition of “complaint”*

Rio Tinto strongly supports the inclusion of a definition of the term “complaint”. As Rio Tinto provide both water services and electricity to various towns and would prefer the definition to be the same as the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022 (Electricity Code)* for consistency for both licensees and customers.

Part 3 of the Code – Billing for water services

2. *Issue 3: Clause 11(6) – meter reads*

Rio Tinto would support an amendment to the Water Code to include circumstances when clause 11(6) does not apply to allow for customers not cooperating with the licensee to provide access to the meter. Rio Tinto does consider that this would need to be supported with evidence, to show that the licensee has tried to contact the customer.

Should the Water Code remain unchanged, Rio Tinto would support the inclusion of reporting on difficult to access meters.

3. *Issue 6: Clause 19(2) – Crediting or refunding overcharged amounts within 15 days*

Rio Tinto would support exclusions to the requirement to credit or refund overcharged amounts within 15 business days if the licensee encounters difficulties i.e. Awaiting information from a customer or third party.

4. *Issue 8: – Charging for paper bills and choosing between paper or electronic bills*

Rio Tinto supports the proposed amendment to allow a customer to choose between receiving a paper bill or electronic bill, without a restriction placed on the amount of times this can be changed.

Rio Tinto would prefer to be allowed to charge for paper billing as costs are incurred for paper billing and to also encourage customers to utilise paperless billing.

Part 4 of the Code – Payment for water services

1. *Issue 7: Clause 20(5) – review of bills within 15 days*

Rio Tinto would support an amendment to include a longer timeframe for regional areas as it can be difficult to mobilise staff to remote areas.

2. *Issue 9a: Clause 28 – Making payment plans or other arrangements available for all customers*

Rio Tinto would support the Water Code requiring licensees to offer a payment plan or other arrangement to all residential customers. Rio Tinto supports making the Water Code more consistent with the Electricity Code.

3. *Issue 9b – Limit on number of payment extensions required to be offered*

Rio Tinto supports making the Water Code more consistent with the Electricity Code, this will be easier the customer and licensees. Further to this the licensee would be able to offer additional payment extensions as required.

4. *Issue 10b – Clause 29(9) – Consultation with a relevant consumer organisation when formulating or reviewing a financial hardship policy*

Rio Tinto would be supportive the removal for the requirement to consult with relevant consumer organisation when formulating or reviewing a financial hardship policy. It is Rio Tinto's preference that licensees should only have to consult with relevant consumer organisation with making material amendments to existing financial hardship policies as per the Electricity Code.

Part 7 of the Code – Complaints about water services

1. *Issue 12 – Clause 48 – Time taken to resolve a complaint*

Rio Tinto is concerned by the proposed inclusion of the requirement for a licensee to meet a set % compliance rating to resolve a complaint before the end of 15 business days. This is due Rio Tinto's small customer numbers and therefore small complaint volumes. Rio Tinto is concerned how this number would be calculated. i.e. If Rio Tinto gets 2 complaints and only 1 of those complaints is resolved within the appropriate time period, would Rio Tinto's % compliance rate be 50%.

2. *Issue 13 – Clause 47 – Right to apply to Ombudsman for review of complaint*

Rio Tinto prefers providing details of the Ombudsman at all times should the customer require them. This allows the customers to be informed and understand their options fully should Rio Tinto be unable to address their complaint to their satisfaction.

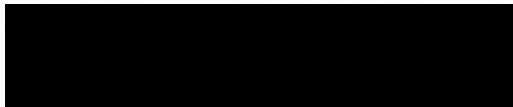
3. *Issue 25 – Clause 51 – Preserved supply register*

Rio Tinto would support the inclusion of the requirement for a licensee to contact customers with special requirements or needs as soon as possible in the event of an unplanned interruption. Rio Tinto would prefer the Water Code to be prescriptive and align with the Electricity Code.

I hope that you will give the above comments your full consideration in developing amendments to the *Water Services Code of Conduct (Customer Service Standards) 2018*.

For further information on this submission, please contact Karyn McDougall, Compliance Advisor on 04 7560 6298 or [karyn.mcdougall@riotinto.com](mailto:karyn.mcdougall@riotinto.com).

Yours sincerely



**Momcilo Andric**  
**General Manager**  
**Utilities**