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wacoss

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a difference*

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31st January 2011

Dear Lanie,

Re: Amendments to the Customer Service Charter Guidelines

WACOSS welcomes the opportunity to comment on amendments to the Customer Service Charter Guidelines (the Guidelines) released by the Economic Regulation Authority (ERA) on 10 January 2011.

Through its member organisations WACOSS is able to gain unique access to the issues confronting varying categories of disadvantaged consumers. WACOSS regularly gathers information from consumer representative agencies in order to guide essential services policy.

WACOSS notes that the ERA has recently removed the requirement for electricity and gas retailers and distributors to produce and review a customer service charter. As such, the document now applies only to water licensees. WACOSS has evaluated the amendments released on 10 January 2011 in consideration of this fact.

Whilst changes have been made throughout the Guidelines, WACOSS asserts that these are in the interest of ensuring the document remains relevant to water licensees (as there is no longer a need for the guidelines to address energy retailers or distributors). As these amendments mostly occur in relation to peripheral details, they do not appear to alter the actual requirements of the Guidelines in any way that would be detrimental to water consumers.

In addition, the amended version of the Customer Service Charter Guidelines is concise in its language and provides further clarity of its directives through multiple references to clause 7 and schedule 3 of the water operating licence. This ensures to the greatest extent possible that water licensees are encouraged to produce and disseminate accurate and effective Customer Service Charters.

In the interest of ensuring accuracy in reference to the Guidelines document, the only additional amendment recommended by WACOSS is that the document title be altered from 'Customer Service Charter Guidelines' to 'Water Customer Service Charter Guidelines'. This change of title would allow consumers and consumer advocates searching for documents of

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consumer protection and regulation to more easily identify the Guidelines as relating exclusively to customer service charters for water licensees.

WACOSS Recommendation:

That the title of the Customer Service Charter Guidelines be altered to 'Water Customer Service Charter Guidelines'.

WACOSS would like to thank the ERA for the opportunity to comment on amendments to the Customer Service Charter Guidelines.

Please do not hesitate to contact Rory Ritchie, Policy Officer, for further information or clarification.

Yours sincerely

Sue Ash
WACOSS CEO