

24 April 2025

Mr Tristan Patterson

Assistant Director, Regulatory, Compliance and Performance
Office of the Tasmanian Economic Regulator
GPO Box 770
Hobart, Tasmania, 7001

Dear Tristan

Proposed amendments to the Tasmanian Water and Sewerage Industry Customer Service Code

TasWater is pleased to make a submission to the consultation on the proposed changes to the Tasmanian Water and Sewerage Industry Customer Service Code ("the Code"). The Code plays an important role to provide clarity of customer-related expectations, procedures and protections for the provision of regulated water and sewerage services by TasWater.

TasWater supports the Tasmanian Economic Regulator (TER) making changes to the Code that improve experience and outcomes for customers, particularly those customers that may be experiencing vulnerability. TasWater also supports changes that add clarity and are practicable for TasWater in the context of its operations.

Please refer to Table 1 below outlining our response to categories of the proposed amendments.

Table 1: TasWater's response to the proposed amendments to the code

Amendment	Response
Require TasWater to have a family violence policy, which includes the minimum standard provisions in the proposed changes to the Code.	TasWater supports the proposed requirement to have a family violence policy outlined in section 6.5 <i>Family violence policy</i> of the Code.
Amend the existing financial hardship provisions to provide guidance on circumstances where a customer may be experiencing financial hardship and for TasWater to identify customers experiencing financial hardship.	TasWater supports the proposed changes to section 6.4. <i>Financial hardship policy</i> of the Code.
Provide for the ability for a customer to waive the requirement for TasWater to clean up and disinfect an area affected by a sewage spill.	TasWater supports the proposed changes to section 11.4. <i>Bursts, leaks, blockages and spills</i> of the Code.
Separate the requirement for dealing with enquiries from the requirements that relate to complaints and dispute resolution.	TasWater supports the proposed changes to section 4. <i>Customer enquiries, complaints and disputes</i> of the Code.

Amendment	Response
Provide for additional means of electronic communication when TasWater contacts customers regarding legal action, disconnection and restriction of services.	TasWater supports the proposed changes to section 9.1 <i>Legal action, restriction and disconnection for non-payment</i> of the Code.
Reduce the rate of interest that TasWater pays on refunds of overcharged amounts and that customers pay on underpayments.	TasWater supports the reduction of the penalty interest rate from 6% to 4% under section 7.4. <i>Interest and other fees</i> of the Code.

TasWater proposes an amendment to section 5.7. *Adjustment of bills* section of the Code, specifically *subsection 5.7.4*. The proposed change is to include a reasonable limit to the amount refunded when a customer is overcharged. TasWater proposes the TER include a clause clarifying that the overcharge will be calculated back to the most recent of the following circumstances, being a:

- Change of ownership of a property
- Change of use of property (i.e. Land use code update provided by 'The LIST')
- Maximum limit of 6 years prior to the discovery of the overcharge (consistent with other legal limits such as the contract law statute of limitations)

TasWater is not practically able to refund previous owners of properties, as up to date contact information for previous customers does not exist. When a change of use of property occurs, this can result in a new charge applied that will be accepted by the customer (e.g. change in equivalent tenement or trade waste charge). TasWater proposes the inclusion of these provisions to be a reasonable limit when the unintended overcharge of a customer occurs.

Should you have any questions or require clarification, please contact Davide Palermo, Economic Regulation and Pricing Manager, at davide.palermo@taswater.com.au or 0439 632 209.

Yours sincerely,



Kane Ingham
Chief Financial Officer