



Trim Reference: 15/121614

20 March 2015

**The Project Officer**

Office of the Tasmanian Economic Regulator

GPO Box 770

Hobart TAS 7001

To whom it may concern

**Draft amendments to the Tasmanian Water and Sewerage Industry Customer Service Code**

Thank you for the opportunity to comment on the proposed amendments to the Tasmanian Water and Sewerage Industry Customer Service Code.

In relation to proposal 1 and the inclusion of fast track amendment provisions in the Code, we note the Regulator's rationale for proposing such a change. We appreciate the view that consultation can be both timely and costly and sometimes inefficient, particularly where the process is effectively duplicated (eg changes arising from a price determination investigation).

We are, however, concerned about the potential for at least some changes made under this proposed provision to have a significant impact on TasWater and/or our customers. In this regard we encourage the Regulator to consider what supporting arrangements are also introduced to safeguard against such an outcome. At a minimum we would expect that there would be a requirement for the Regulator to make information about any fast track amendments to the Code publically available at the earliest opportunity, ie prior to the changes actually being made.

With respect to proposal 2, we have considered the proposed amendment in the context of our current standard practice which, as the Regulator would be aware, is continuous daily billing. We are of the view that the suggested wording needs to be amended to ensure it does not have the unintended consequence of requiring a change in our billing practice. In this regard, we propose the following wording for clause 5.3.2:

*An Account for the Services we provide to you in a Billing Period at any time during or up to 30 days after the end of that Billing Period.*

We do not have any concerns or comments regarding proposals 3 to 5 (inclusive).

If you have any queries in relation to this matter or wish to discuss the content of this submission please contact Alison Turner, Department Manager Regulation and Pricing by phone on 6237 8392 or via email to [alison.turner@taswater.com.au](mailto:alison.turner@taswater.com.au).

Yours Sincerely



**Eleanor Bray**

General Manager, Retail and Customer Services