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## Customer Water and Sewerage Services Code Review

Thank you for the opportunity to comment on the Water and Sewerage Service Code for Small Customers in South East Queensland (the Code).

National Seniors is the largest organisation representing Australians aged 50 and over, with around 200 000 members nationally. We provide a well-informed and representative voice on behalf of older Australians and contribute to public education, debate and community consultation on issues of direct relevance to them.

Many of National Seniors' Queensland members report they are struggling with the growing cost of essentials including water and sewerage.

Our research has revealed that over the five years to March 2013 non-discretionary (essential) items, such as water gas, insurance, medical services and rates, all rose by more than double the inflation rate. Water and sewerage alone have risen by 63.1 per cent or 4.7 times CPI. These cost of living pressures reinforce the necessity of a strong Code to ensure consumer protections for all Queenslanders.

### National Seniors recommends the following amendments:

1. Extend the Code to tenants and other consumers who directly or indirectly pay for all or part of water and/or sewerage charges including tenants within retirement villages.
2. Extend the Code to include regions with large populations serviced by a monopoly water provider, for example Townsville.

The consumer protection measures within the Code including complaints and dispute resolution processes, access to the Energy and Water Ombudsman (EWOQ) and access to payment plans should be available to all household consumers regardless of their tenancy and physical location.

The current exclusion of consumers who do not have a direct billing relationship with a SEQ service provider is inappropriate and does not reflect the reality of modern living arrangements, leaving many consumers outside the protection of the Code.

3. Extend the Code to obligate SEQ service providers to accept Centrepay (a free direct bill-paying service available to customers receiving Centrelink payments) and to offer more frequent billing periods for customers on concession cards.

The majority of Queensland council-operated water providers including Townsville and Toowoomba accept Centrepay. It is also commonly accepted within other state jurisdictions. The Western Australian Water Corporation has introduced two-monthly billing to make payments more manageable for their customers. The Water Corporation also indicates that the additional cost of more frequent billing will be offset by water efficiency benefits and improved leak detection.

These amendments will ensure that vulnerable consumers can more easily manage their water and sewerage bills and subsequently reduce the risk of late or nonpayment.

4. Extend the Code's Limitations on Supply Restrictions to include:
  - Outstanding disputes registered with the SEQ service provider and/or EWOQ;
  - Bill in arrears of less than \$100; and
  - that supply cannot be restricted on a public holiday, weekend or a Friday.

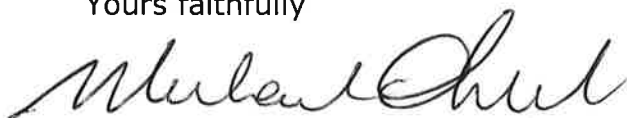
As water is an essential service, disconnection and supply restrictions should be a last resort. Minor infringements should not result in supply restrictions.

5. The Code should be expanded to obligate SEQ service providers to disclose on its web site:
  - its hardship policy - hardcopies of the SEQ providers hardship policy should also be available to consumers on request; and
  - the number of complaints received, the general nature of the complaint, the number of complaints subsequently referred to the EWOQ and the time taken to resolve the complaint.

Increased disclosure obligations would ensure SEQ service providers are publicly accountable and are transparent with their approach to addressing consumer complaints. Increased disclosure will enable consumers to become more informed of their rights when experiencing difficulties in paying their bills.

To ensure the Code continues to meet its objectives, National Seniors requests that these amendments to the Code are implemented.

Yours faithfully



**Michael O'Neill**  
Chief Executive