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Private and confidential

Att: Paul Reid
A/Executive Director, Licensing Monitoring and Customer Protection
Economic Regulation Authority
PO Box 8469
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31 October 2016

Our reference: RTIO-AM-0174130

Dear Paul

Rio Tinto Iron Ore submission to Consultation Paper of the 2016-2017 Review of the *Water Services Code of Conduct (Customer Service Standards) 2013*

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

Rio Tinto (through Hamersley Iron Pty Ltd and Robe River) is a licensed Water Service provider under the *Water Services Act 2012*, providing potable water and wastewater 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

Application of the Water Code

1. *Issue Number 2, 3.2 Clause 2 – Commencement*

Rio Tinto would support a staged commencement of an amended Water Code, should the Water Code come into operation on 1 July 2017. This is due to some of the proposed amendments being more complex than others and therefore will require additional time to implement them.

Billing for water services

2. *Issue Number 16, 4.10 Clause 12(3) Information on bills: customer rights*

Rio Tinto would prefer that all bills contained the same information

Payment for water Services

3. *Issue Number 20, 5.2 Clause 21 – Payment methods: direct debt*

Rio Tinto does not support the removal of direct debt as a payment method being removed from the Water Code. Currently a large proportion of Rio Tinto's customers are utilising direct debt.

4. *Issue Number 23, 5.5 Clause 25 – Assistance for customers experiencing payment difficulties: charging fees and interest*

Rio Tinto does not support licensees being allowed to charge fees or interest on payment plans offered to customers experiencing payment difficulties. Rio Tinto considers that charging fees or interest on payment plans to a customer experiencing payment difficulties could exacerbate the problem and therefore should not be allowed.

5. *Issue Number 30, 5.12 Clause 27 – Assistance for customers experiencing financial hardship*

Rio Tinto strongly supports additional requirements to be included in the Water Code that a licensee must follow when assessing whether or not a customer is experiencing payment difficulties. Rio Tinto considers that additional requirements could standardise customer treatment across all licensees.

Reducing the rate of flow of water

6. *Issue Number 34, 6.1 Clause 31 – Preliminary action – reminder notices*

Rio Tinto would support the requirement for reminder notices to be provided to customer prior to action being taken for non-payment of a bill. A reminder notice would prove customers with further protection and also possibly reduce volumes of outstanding bills as customers would be further informed.

Complaints about water services

7. *Issue Number 43, 7.2 Clause 35(4)a) – Referring complaints to the Ombudsman*

Rio Tinto would support the deletion of the requirement for a licensee to state that a customer may, but does not have to, use the licensee's complaints procedure before or instead of the Energy and Water Ombudsman WA's (**Ombudsman**) procedures. As the deletion of this requirement would make the process of contacting the licensee prior to contacting the Ombudsman clearer for customers. This amendment would be further supported by Issue 44 as below.

8. *Issue Number 44, 7.3 Advising customers of the existence of the water ombudsman*

Rio Tinto would supports the inclusion of a licensee being required to advise customers of their right to raise their complaints with the Ombudsman if the customer is not satisfied and also the licensee being required to provide customers with the Ombudsman's freecall telephone number.

9. *Issue Number 45, 7.4 Complaints to be considered by a senior employee*

Rio Tinto would not support the inclusion of an escalation process which allows customer to request that their complaint be considered by a senior employee. As currently all customer complaints made to Rio Tinto are managed via a standardised process therefore the outcome of a complaint would be the same no matter what level the employee addressing the complaint would be.

Information and communication services

10. *Issue Number 50, 8.3 Clause 37 – Information to be publically available: Water Code*

Rio Tinto would not support the requirement for electronic copies of the Water Code being available on licensee's websites as this information is freely available on governmental websites. Placing this information on licensee's website is duplication.

Other

11. Issue Number 54, 9.4 Variation of tariffs

Rio Tinto would support licensees being required to advise their customers of tariff changes as soon as practicable, but no later than on the customer's next bill. This is in line with open and transparent communication between the licensee and the customer.

12. Issue Number 55, 9.5 Service Standard Payments

Rio Tinto would prefer that licensees were given until the 1st July 2018 to implement the service standard payments should, service standard payments be included into the revised Water 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) 2013*.

For further information on this submission, please contact [REDACTED]
[REDACTED]

Yours sincerely

Momcilo Andric
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Core Services