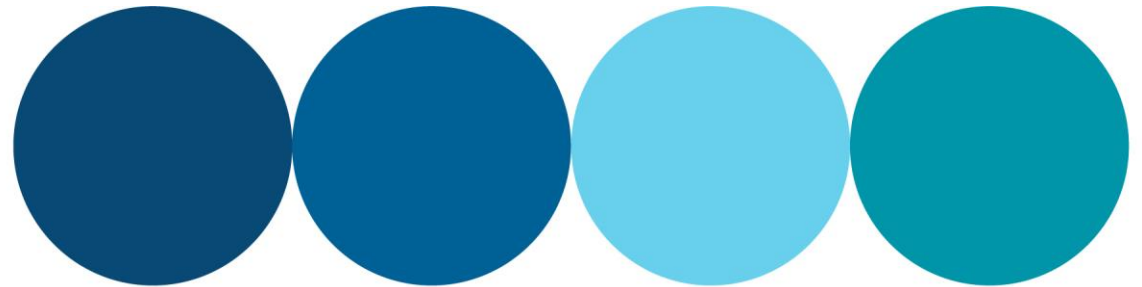


Water Corporation Post Audit Implementation Plan

December 2022





Finding Reference: 01/2022		Rating: B2	
Observations	Recommendations		
<p>Legislative Obligation (31):</p> <p><i>If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with the Registrar along with the prescribed fee (if any) if the charge or contribution has been paid.</i></p> <p>Observation:</p> <p>Audit process revealed one instance of Memorial withdrawal being performed by the customer. The procedure of the customer or settlement agent lodging the memorial withdrawal on behalf of the customer appears to be inconsistent with the obligation 31 under the Water Service Act 128(4), which states “the licensee must lodge a withdrawal of memorial with the Registrar”.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Re-align its business process to the regulatory requirements by lodging the withdrawal instead of requiring the customer to lodge the withdrawal. 	<p>Management Comment</p> <p>Memorials are removed when the debt is paid either at settlement when the property is sold or when the customer clears the debt.</p> <p>The settlement process involves other parties and partnering with settlement agents to lodge the withdrawal documents supports an efficient settlement process.</p> <p>There was one instance of memorial withdrawal being performed by a customer outside the settlement process.</p>	
		<p>Agreed Action</p> <ol style="list-style-type: none"> 1. The Corporation will realign its process to ensure it removes memorials in non-settlement situations. 	
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>	
		<p>Date of Implementation</p> <p>30 April 2023</p>	



Finding Reference: 02/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligation (34):</p> <p><i>A person authorised by the licensee may enter a road and exercise a works power of the licensee without consent, notice or warrant unless the exercise of the power involves opening or breaking up the surface of the road, or would cause a major obstruction of the road or disruption of the traffic, in which case the licensee must give at least 48 hours' notice to the public authority that has control or management of the road.</i></p> <p>Observation:</p> <p>In the 2020 Operational Audit, the Auditor had recommended: To improve compliance with regards to planned events, we recommend that the Corporation implement a system control to prevent the creation of a work order unless the 48 hours' notice has been recorded and stored on the system.</p> <p>In response to the recommendations, the Water Corporation is progressing the Work Management project (Maximo), which is seen as the system solution to this problem. At this stage, the project has not committed to including the break the roads notification process in the scope of the project. In the interim, Operations Performance continues to provide a monthly performance report in relation to this obligation to Regions, and report non-compliances to Risk and Assurance when requested. These controls are still largely reliant on individuals' knowledge and behaviours.</p> <p>In the 2020/21 Annual Report to the ERA, the Corporation reported 55 events which the Corporation failed to provide 48 hours prior notice. For the audit scope period, there were 62 instances in total.</p>	<p>We recommend that the Corporation:</p> <ul style="list-style-type: none"> — Develop a system generated notification embedding a control to ensure the prescribed timeframe is met; and — Implement a system control in Maximo to prevent work from commencing until the notification has been registered on the system and 48 hours have elapsed since the notice was sent. 	<p>Management Comment</p> <p>In 2020/21 we had 55 non-compliances, and in 2021/22 we had 7 non-compliances which has demonstrated a positive trend towards our target of no breaches.</p> <p>Agreed Action</p> <ol style="list-style-type: none"> 1. Continue to monitor compliance and investigate non-compliances 2. Work with IT for next project phases to understand the feasibility of including in scope for future uplifts. <p>Responsible Officer</p> <p>Head of Operations Performance</p> <p>Date of Implementation</p> <ol style="list-style-type: none"> 1. Ongoing 2. 30 September 2025



Finding Reference: 03/2022		Rating: B2
Observations	Recommendations	Management Comment
<p>Legislative Obligation (67):</p> <p><i>If the owner or occupier requests the licensee to test a meter and pays the charge (if any) for testing that type of meter, the licensee must test the meter in accordance with a procedure approved by the CEO for the purpose of this regulation.</i></p> <p>Observation:</p> <p>We consider the licence obligation imposes a requirement on a specific position of the Corporation “for the purpose of this regulation”, which cannot be delegated and further sub-delegated.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> Review the following documents to reflect the requirement of Regulation 26(3), where the CEO must approve the procedure: <ul style="list-style-type: none"> - Asset Monitoring & Systems Investigations AMSI-P-120 Meter Testing and Reporting. - Asset Monitoring & System Investigations AMSI-P-004 Authority to maintain documentation for testing water meters. - Asset Monitoring & System Investigations AMSI-W-128 Customer Dispute Meter Test. 	<p>Management Comment</p> <p>We do not agree that the CEO cannot delegate this responsibility as covered by several previous audits.</p> <p>The document is a very detailed technical procedure that it is unlikely that the CEO would be across the detail of the testing requirements at this level. He has delegated to the Head of Engineering who has further delegated to the section manager of the section that undertakes the testing in accordance with this procedure.</p> <p>We can amend the approval to include the Head of Engineering to ensure that the CEO’s delegation is not further delegated.</p> <p>Agreed Action</p> <p>Amend the procedure approval to include the Head of Engineering.</p> <p>Responsible Officer</p> <p>Head of Engineering</p> <p>Date of Implementation</p> <p>June 2023</p>



Finding Reference: 04/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligation (98A):</p> <p><i>Despite subclauses 11(4) and (5), a bill for usage based on a meter reading must be issued at least once in every 12-month period.</i></p> <p>Observation:</p> <p>The 2022 Operational Audit procedures revealed a total of 718 breaches from 1 July 2020 to 30 June 2022. Reasons for non-compliance vary; however, the predominant reason is the Corporation was unable to access the property or contact the owner to obtain a meter reading. In these instances, the Corporation issues a bill bi-monthly based on an estimate of water use and takes follow-up action with the customer.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> To develop a strategy to ensure a meter reading is obtained at least once in every 12 months. 	<p>Management Comment</p> <p>There will always be instances where it is physically impossible or unsafe for our people to obtain a meter read.</p> <p>The Corporation has requested amendments to the Water Services Code of Conduct (Customer Service Standards) 2018 to reflect this by setting a % KPI.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> The Corporation will review its processes with a view to improving compliance performance.
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>30 June 2023</p>



Finding Reference: 05/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligation (100A):</p> <p><i>A bill issued for 2 or more water services must specify the charge payable for each water service.</i></p> <p>Observation:</p> <p>Our inquiry identified instances where two or more water services have been provided, but the charge payable for each service has not been specified.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Develop an IT solution and update the billing template to separate the charges when 2 or more water services are provided to a property. 	Management Comment
		The Corporation will undertake the following.
		Agreed Action
		<ol style="list-style-type: none"> 1. Investigate the possibility of an IT solution that will better specify the charge for each water service on the bill.
		Responsible Officer
Head of Customer Billing Operations		
Date of Implementation		
31 December 2023		



Finding Reference 06/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (101):</p> <p><i>Each bill for usage for a metered water service must contain the specified information.</i></p> <p>Observations:</p> <p>Our inquiries indicate farmland properties with multiple meters did not have the service charges for each water service (Desalinated and Saline) specified. The meters were grouped into one overall charge.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Develop an IT solution and update the billing template to include the previous billing period information and the corresponding billing period in the previous year. 	<p>Management Comment</p> <p>This issue was proactively identified prior to the audit and work is underway to rectify this.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> 1. The Corporation will develop a solution and update the billing template to include this information.
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>31 May 2023</p>



Finding Reference: 07/2022		Rating: B3
Observations	Recommendations	
<p>Legislative Obligations (104A):</p> <p><i>Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the prescribed information.</i></p> <p>Observations:</p> <p>Through our examination of bills, discussions with key stakeholders, and observations of related processes, procedures and operations, we identified the bills refer to the month, not 'day' that the tariff will reset. The Corporation advised that it is not possible to determine 12 months in advance the exact day that the Corporation will conduct the final meter reading of the year, which is when the tariff will reset.</p> <p>Additionally, the Corporation confirmed there is several properties where the bill does not show how much more water the customer can be supplied with before supply starts to be in the next volumetric range, and the tariff for the next volumetric range.</p> <p>The Corporation advised this non-compliance will be addressed in the next review of the Code in 2023.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. The Corporation should implement measures to ensure the bill reflect: the day on which the customer's next consumption year starts; how much more water the customer can be supplied with before supply starts to be in the next volumetric range; and the tariff for the next volumetric range. 	<p>Management Comment</p> <p>This has been referred to the ERA for a proposed change to the Water Services Code of Conduct (Customer Service Standards) 2018.</p>
		<p>Agreed Action</p> <p>No action – refer above.</p>
		<p>Responsible Officer</p> <p>N/A</p>
		<p>Date of Implementation</p> <p>N/A</p>



Finding Reference: 08/2022		Rating: B2
Observations	Recommendations	Management Comment
<p>Legislative Obligations (109):</p> <p><i>The licensee must not charge interest or late payment fees on an undercharged amount.</i></p> <p>Observations:</p> <p>We randomly sampled 15 undercharged accounts and found that three (3) accounts had accrued interest or late payment fees on those undercharged amounts.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Develop data analytics procedure to detect interest or late payment charged in undercharged amounts. 2. Develop a system solution that restrict charging interest on undercharged amounts. 	<p>Management Comment</p> <p>Undercharged amounts are never backdated and no interest is applied which the Corporation believe is the intent of the Code.</p> <p>The three accounts referred to were charged interest after the bill for the adjusted charge became overdue.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> 1. Raise as a part of the Water Code Review
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>31 December 2023</p>



Finding Reference: 09/2022		Rating: C2
Observations	Recommendations	Management Comment
<p>Legislative Obligations (111A):</p> <p><i>The licensee must, within 15 business days of becoming aware of an overcharge, credit the overcharged amount to the customer's account or send the customer a notice informing the customer of the overcharging and recommending options for how the overcharged amount may be refunded or credited to the customer's account.</i></p> <p>Observations:</p> <p>We randomly sampled forty (40) overcharged accounts during the audit scope period and found that five (5) out of forty (40) accounts sampled had not complied with the timeframe of 15 business days to notify the customer about the outcome of the analysis of overcharged bill. It appears the breaches occurred because the Corporation was waiting for the results of the inspection, which needed to be carried out in regional areas leading to the 15-business day timeframe not met.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Inform affected customers immediately of the overcharge. 2. Investigate to identify other potentially affected customers and calculate and reimburse the amount of the overcharge. 3. Test the relevant Grange billing rule periodically to ensure compliance with regulatory requirements. 4. Use data analytics to detect exceptions to the regulatory requirements. 	<p>Management Comment</p> <p>This has been referred to the ERA for a proposed change to the Water Services Code of Conduct (Customer Service Standards) 2018 to reflect this by setting a % KPI.</p> <p>Agreed Action</p> <ol style="list-style-type: none"> 1. Clarify intent with ERA with regards to date the 15-business day timeframe commences. <p>Responsible Officer Head of Customer Billing Operations</p> <p>Date of Implementation 31 December 2023</p>



Finding Reference: 10/2022		Rating: B2
Observations	Recommendations	Management Comment
<p>Legislative Obligations (117):</p> <p><i>The licensee must inform the customer of the outcome of a review of the customer's bill as soon as practicable or otherwise less than 15 business days from the day the customer's request for review was received.</i></p> <p>Observations:</p> <p>We have sampled 17 contacts regarding overcharged, 23 contacts regarding undercharged and four (4) contacts relating to billing complaints, totalling 44 contacts. We have found 11 instances non-compliant. For 11 out of the 44 instances tested, non-compliances related to access issues or inspections of remote properties.</p> <p>We have confirmed with the Team Leader Policy & Compliance that bill reviews are monitored through reporting and are followed up to ensure they meet the KPI as much as possible. There are some instances where it is not possible to achieve the 15-day KPI. Where the Corporation is unable to meet the KPI, the customer is provided with an interim response on or before the 15th day.</p>	<p>We recommend that the Corporation:</p> <ul style="list-style-type: none"> — Provide further training to relevant staff on the requirements to inform the customer within 15 business days. — Formulate a compliance strategy, and action plan to ensure customer is informed of the outcome of a review of the customer's bill within 15 business days. 	<p>There will always be instances where it is not possible to meet the 15-day KPI due to the nature of running a state-wide operation.</p> <p>Current compliance rate of 97.46%.</p> <p>The Corporation has requested amendments to the Water Services Code of Conduct (Customer Service Standards) 2018 to reflect this by setting a % KPI.</p>
		<p>Agreed Action</p> <p>1. Clarify intent with ERA with regards to date the 15-business day timeframe commences.</p>
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>31 December 2023</p>



Finding Reference: 11/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (117A):</p> <p><i>The licensee must notify each of its customers of any change to the amount or rate of a water service charge in accordance with the requirements in clause 21(2).</i></p> <p>Observations:</p> <p>We randomly sampled a total of 20 bills based on Quantity Charge, Fixed Charge, and Quantity Charge plus Fixed Charge during the audit scope period. We found that 16 out of 20 sampled bills had not complied with notifying the customer about change to rate of water service charge.</p> <p>Through sample testing, we identified a pattern that for the bills containing fixed charges the Corporation had not notified the change of charge on the next bill, and neither had it been included in the notification in the next bill.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> To review the billing template to ensure that customers are notified of any change to the amount or rate of water service. 	<p>Management Comment</p> <p>This relates to the annual price increase process when new prices are applied to bills after 1 July.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> Clarify intent with ERA
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>31 December 2023</p>



Finding Reference: 12/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (118):</p> <p><i>The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued.</i></p> <p>Observations:</p> <p>We randomly sampled 22 bills during the audit scope period to test compliance with Clause 23 of the Water Services Code of Conduct (Customer Service Standards) 2018. We found that three (3) out of 20 samples had not complied with the time set for the payment of a bill after 14 days from when the bill is issued.</p>	<p>We recommend that the Corporation:</p> <p>1. To review the root cause of the instances identified; and implement appropriate system control to ensure the time set for the payment of a bill must be after 14 days from when the bill is issued.</p>	Management Comment
		<p>The Corporation is aware of the root causes of the 2 instances identified:</p> <ul style="list-style-type: none"> • Customer negotiated a payment arrangement • System anomaly <p>Systems changes have been implemented to address the system anomaly.</p>
		Agreed Action
		<p>No action – refer above.</p>
		Responsible Officer
		<p>N/A</p>
Date of Implementation		
<p>N/A</p>		



Finding Reference: 13/2022		Rating: A2
Observations	Recommendations	Management Comment
<p>Legislative Obligations (133A):</p> <p><i>The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances</i></p> <p>Observations:</p> <p>We randomly sampled 105 accounts and found that three accounts had accrued interest or late payment fees for customers assessed under financial hardship or made any complaint related to non-payment of the bill until it was solved.</p> <p>The Corporation had confirmed that it used to have a manual system to follow up and to ensure no interest was charged. A rule in the Grange billing system was implemented last year to take care of this issue. However, the testing identified this issue occurred after the billing rule in Grange was introduced.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Periodically test the Grange rule; and perform data analytics to detect instances of interests being charged on accounts under financial hardship. 	<p>This issue was proactively identified prior to the audit and a system solution implemented on 1 July 2021.</p> <p>The three accounts referred to had interest charged prior to the system solution's implementation when this process was not automated.</p>
		<p>Agreed Action</p> <p>No action - refer above.</p>
		<p>Responsible Officer</p> <p>N/A</p>
		<p>Date of Implementation</p> <p>N/A</p>



Finding Reference: 14/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (134):</p> <p><i>The licensee must not commence or continue proceedings to recover a debt from a customer if the customer is complying with a payment plan or other arrangement, is being assessed for payment difficulties or is being assessed for financial hardship.</i></p> <p>Observations:</p> <p>The Corporation has developed the procedure on Recovery of Property Debt Legal Action. Clause 1.2.1 Issue Claim states: to review the circumstances surrounding the charges to ensure the Corporation has the ability to prove the claim and to check if the customer has been identified as 'Financial Hardship' and consider alternative action including referral to a financial counsellor. We reviewed 29 accounts and found two (2) instances where the Corporation continued proceedings to recover a debt from a customer when the customer was experiencing financial hardship.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> To implement appropriate preventative controls to ensure that debt recovery actions are not initiated against customers who are experiencing financial hardship or have been assessed for payment difficulties. 	<p>Management Comment</p> <p>This issue was proactively identified prior to the audit with reporting enhancements implemented in November 2021 to rectify this.</p> <p>The two instances referred to were prior to the reporting enhancement.</p>
		<p>Agreed Action</p> <p>No action – refer above.</p>
		<p>Responsible Officer</p> <p>N/A</p>
		<p>Date of Implementation</p> <p>N/A</p>



Finding Reference: 15/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (137C):</p> <p><i>The restriction notice must include the specified information.</i></p> <p>Observations:</p> <p>We have reviewed the contents at: https://www.watercorporation.com.au/contact ; and concluded that it does not provide information about procedure for dealing with complaints about water services pursuant to Clause 46.</p> <p>The procedures for dealing with complaints about water services can be found at: https://www.watercorporation.com.au/About-us/Our-commitments/Customer-and-service-commitments/Customer-complaint-resolution .</p> <ul style="list-style-type: none"> By not providing the correct reference link on the restriction notice for procedure for dealing with complaints about water services, the Corporation has not achieved compliance with Clause 36(3)(c). 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> Ensure the notice includes specific reference to information about the existence and operation of the complaint procedure. 	<p>Management Comment</p> <p>The Corporation will implement the following.</p>
		Agreed Action
		<ol style="list-style-type: none"> Update the restriction notice to include specific reference to information about the existence and operation of the complaint procedure.
		Responsible Officer
		Head of Customer Billing Operations
		Date of Implementation
		31 May 2023



Finding Reference: 16/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligation (138B):</p> <p><i>The licensee must not start a water supply restriction on or during the specified times.</i></p> <p>Observation:</p> <p>We reviewed 245 accounts and detected one (1) instance that did not comply with Clause 38, which requires the Corporation not to restrict the water supply after 3 pm on any day.</p>	<p>We recommend that the Corporation:</p> <ul style="list-style-type: none"> — Provide further training to relevant staff on the requirement of water supply restriction parameters. — Continue to regularly monitor and report on the restriction requirement. 	<p>Management Comment</p> <p>Once the breach was identified and investigated follow-up training was undertaken to ensure the relevant personnel were clear on requirements.</p> <p>There is an opportunity to review our current training approach for adequacy and timing.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> 1. Review the current training to ensure it is adequate and delivered in a timely manner. 2. Continue to monitor compliance and investigate non-compliances.
		<p>Responsible Officer</p> <p>Head of Operations Performance</p>
		<p>Date of Implementation</p> <ol style="list-style-type: none"> 1. 31 March 2023 2. Ongoing



Finding Reference: 17/2022		Rating: B2	
Observations	Recommendations		
<p>Legislative Obligation (140):</p> <p><i>The Water Corporation must restore a water supply to land in the metropolitan region within the specified timeframe unless the licensee and customer expressly agree otherwise.</i></p> <p>Observation:</p> <p>We reviewed 211 accounts and detected two (2) instances that did not comply with the restoration of water supply to land in the metropolitan region.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 2. Provide further training to relevant staff on the restoration timeframe requirement. 3. Continue to regularly monitor and report on the restoration timeframe requirement. 	<p>Management Comment</p> <p>Our restoration focus has been on the delivery of the performance requirement specified in Obligation 143, “a 90% compliance rate with clauses 41(2) and 41(3) in any 12 month period ending on 30 June”. As such we look at adverse trends not immediately at each individual non-conformance as recommended here.</p> <p>That said there is an opportunity to review our current training approach for adequacy and timing, and use the data to identify emerging areas of concern to target re-training.</p>	
		<p>Agreed Action</p> <ol style="list-style-type: none"> 3. Review the current training to ensure it is adequate and delivered in a timely manner. 4. Continue to monitor compliance and investigate non-compliances. 	
		<p>Responsible Officer</p> <p>Head of Operations Performance</p>	
		<p>Date of Implementation</p> <p>31 March 2023</p>	



Finding Reference: 18/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligation (141):</p> <p><i>The Water Corporation must restore a water supply to land outside the metropolitan region within the specified timeframe, unless the licensee and customer expressly agree otherwise.</i></p> <p>Observation:</p> <p>We reviewed 84 accounts and detected two (2) breaches that do not comply with the restoration of water supply to land outside the metropolitan region.</p>	<p>We recommend that the Corporation:</p> <ul style="list-style-type: none"> — Provide further training to relevant staff on the water supply restoration timeframe requirement. — Continue to regularly monitor and report on the restoration timeframe requirement 	<p>Management Comment</p> <p>Our restoration focus has been on the delivery of the performance requirement specified in Obligation 143, “a 90% compliance rate with clauses 41(2) and 41(3) in any 12 month period ending on 30 June”. As such we look at adverse trends not immediately at each individual non-conformance as recommended here.</p> <p>That said there is an opportunity to review our current training approach for adequacy and timing, and use the data to identify emerging areas of concern to target re-training.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> 1. Review the current training to ensure it is adequate and delivered in a timely manner. 2. Continue to monitor compliance and investigate non-compliances.
		<p>Responsible Officer</p> <p>Head of Operations Performance</p>
		<p>Date of Implementation</p> <p>31 March 2023</p>



Finding Reference: 19/2022		Rating: CN/R
Observations	Recommendations	
<p>Legislative Obligation (144A):</p> <p><i>The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption.</i></p> <p>Observation:</p> <p>The Corporation was using Maximo System for recording the outage plan. Most of the outage plan were recorded and few were not recorded (The Corporation's testing of planned interruptions in 2019 found that 23% of the interruptions were never recorded in the outage management system which raises doubt whether the required notice was given or not). The Maximo system allows the plan to be recorded for less than 48 hours. The system does not contain the detail of customer which would be essential in identifying the notice period provided to the customer. Further, the Corporation does not have the ability to track accurately when, and if, the notifications are delivered. Accordingly, there is no effective control to demonstrate compliance with the obligation.</p>	<p>We recommend that the Corporation:</p> <p>— Upgrade its plan outage system along with appropriate control mechanism to track the delivery of the notifications.</p>	Management Comment
		We will continue to look to uplift the Maximo system and look for a system solution that records customer notification confirmation.
		Agreed Action
		<ol style="list-style-type: none"> 1. Continue to monitor compliance and investigate non-compliances 2. Work with IT for next project phases to understand the feasibility of including in scope for future uplifts.
		Responsible Officer
Head of Operations Performance	Date of Implementation	
	<ol style="list-style-type: none"> 1. Ongoing 2. 30 September 2025 	



Finding Reference: 20/2022		Rating: CN/R
Observations	Recommendations	
<p>Legislative Obligation (144B):</p> <p><i>The notice of any planned service interruption must be given within the prescribed timeframes</i></p> <p>Observation:</p> <p>The Corporation was using Maximo System for recording the outage plan. Most of the outage plan were recorded and few were not recorded (The Corporation's testing of planned interruptions in 2019 found that 23% of the interruptions were never recorded in the outage management system which raises doubt whether the required notice was given or not). The Maximo system allows the plan to be recorded for less than 48 hours. The system does not contain the details of customer which would be important to identify if the notice has been within the prescribed period to customer. Further, the Corporation does not have the ability to track accurately when, and if, the notifications are delivered. Accordingly, there is no effective control to demonstrate compliance with the obligation.</p>	<p>We recommend that the Corporation:</p> <p>—Upgrade its plan outage system along with appropriate control mechanism to track the delivery of the notifications.</p>	<p>Management Comment</p> <p>We will continue to look to uplift the Maximo system and look for a system solution that records customer notification confirmation.</p> <p>Agreed Action</p> <ol style="list-style-type: none"> 1. Continue to monitor compliance and investigate non-compliances 2. Work with IT for next project phases to understand the feasibility of including in scope for future uplifts. <p>Responsible Officer</p> <p>Head of Operations Performance</p> <p>Date of Implementation</p> <ol style="list-style-type: none"> 1. Ongoing 2. 30 September 2025



Finding Reference: 21/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (149A):</p> <p><i>When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman.</i></p> <p>Observations:</p> <p>Through our procedures, we observed that the Corporation did not inform all customers that they have a right to apply to the ombudsman and provide a Freecall telephone number for the ombudsman.</p> <p>We observed that the Corporation has identified 350 breaches out of 1,262 complaints in the Annual Compliance Report 2020/21 to the ERA.</p> <p>Our review of 1,875 complaints for the whole scope period (1 July 2020 to 30 June 2022) identified 420 instances that did not comply with Clause 47.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> To provide further training to relevant staff to inform the customer the right to apply to the Water Services Ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman, and continue to regularly monitor and report on the restoration benchmark. 	<p>Management Comment</p> <p>The Corporation will undertake the following.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> Provide further training to relevant staff.
		<p>Responsible Officer</p> <p>Head of Customer Service</p>
		<p>Date of Implementation</p> <p>30 April 2023</p>



Finding Reference: 22/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (153):</p> <p><i>The licensee must make the prescribed information publicly available.</i></p> <p>Observations:</p> <p>Section 49(1) states, inter alia that, A licensee need to make information about the following information to be publicly available—(h) that if the customer is offered a payment plan or other arrangement giving the customer more time to pay the bill or to pay arrears, the licensee’s power as mentioned in paragraph (g) can only be exercised if</p> <ul style="list-style-type: none"> (i) the customer has not accepted the offer within the period of 7 days after the day on which it was made; or (ii) having entered such a plan or other arrangement, the customer does not comply with it. <p>The condition in 49(1)(h) is only enlivened when the customer fails to pay the required debt to the corporation and the customer is provided more time to pay the bills or to pay arrears. If the customer does not accept the offer of arrangement within 7 days or does not comply with the arrangement executed, the Corporation can exercise the power as mentioned in paragraph 49(1)(g).</p> <p>The Corporation’s approach is to negotiate an outcome that is mutually acceptable which factors in the customer’s specific circumstances when engaging with the customers who are having payment difficulty. This interaction with the customer is agreed and finalised in the initial conversation/communication. The Corporation does not offer a payment plan without the customer’s agreement and then advise them that they must accept the offer within 7 days.</p> <p>Accordingly, the Corporation website does not have information, which states it may restrict supply if the customer does not accept an offer of a payment plan within 7 days.</p> <p>Whilst the Corporation’s approach is customer-centric, we consider the Code in this regard to be prescriptive and requires the requisite information to be provided publicly.</p>	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> Includes the information as mentioned in Clause 49(1)(h) on its website. 	<p>Management Comment</p> <p>The Corporation will undertake the following.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> Include all relevant information on the website.
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>30 June 2023</p>



Finding Reference: 23/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (154):</p> <p><i>The licensee must ensure that the specified information about bills may be obtained from its website.</i></p> <p>Observations:</p> <p>Clause 49 (2) states, inter alia, that: A licensee must ensure that the following information about bills may be obtained from its website — (b) that in the case of a metered water service, a customer may request a meter reading and bill to determine the outstanding charge for a period that is not the same as the usual billing cycle; (c) that in the case where a customer disputes an estimate on which a bill is based, the customer may request a meter reading (if the water service is metered and the meter is operable) and in any event a revised bill and that if the customer so requests, information about the fees that apply; (d) that a customer may request, in accordance with the regulations mentioned in section 79(3)(b), the testing of a meter and that if the customer so requests, information about the fees that apply and when the fees may be reimbursed in accordance with the regulations mentioned in section 79(3)(c). Our review of the Corporation's public website identified: — It does not provide that a customer can request a meter test and information regarding testing charges and reimbursement; and — Estimated reads information does not state the customer may request a meter reading. The absence of prescribed information contravenes the requirements of Clause 49(2).</p>	<p>We recommend that the Corporation: Ensure internal stakeholders, such as Information Technology and relevant business units, collaborate when updating the Corporation's website to reflect the required regulatory information. The Corporation's website should be updated to include the following:</p> <ul style="list-style-type: none"> - Information on how a customer can request a meter test and information regarding testing charges and reimbursement; and - Estimated reads information should state the customer may request a meter reading. 	Management Comment
		<p>The Corporation will implement the following.</p>
		Agreed Action
		<ol style="list-style-type: none"> 1. Ensure the relevant business units collaborate when updating the Corporation's website. 2. Update the website to inform how a customer can request a meter test and information regarding testing charges and reimbursement. 3. Update the estimated reads section to include that the customer may request a meter reading.
		Responsible Officer
<p>Head of Brand & Customer Strategy</p>		
Date of Implementation		
<p>31 March 2023</p>		



Finding Reference: 24/2022		Rating: B2
Observations	Recommendations	
<p>Legislative Obligations (191):</p> <p><i>The licensee must have a family violence policy that sets out the matters specified in clause 5(1).</i></p> <p>Observations:</p> <p>We make the following observation of the Corporation's Family Violence Policy:</p> <ul style="list-style-type: none"> — [5(1) (b)]: The Corporation's Family Violence Policy is silent on the information to be provided to customers affected by family violence about external services through which they can receive support, and when that information is to be provided; — [5(1) (c)]: The Corporation's Family Violence Policy is silent on the process by which the account of customer affected by family violence can be identified by employees without the need for customer to repeat details of the issues. (Even the website has no specific process to address this matter). — [5(1) (d)]: The Corporation's Family Violence Policy is silent about the process by which information provided by customer regarding family violence are protected. — [5(1) (e)]: The circumstances are not defined in the Corporation's Family Violence Policy as to how payment difficulties are addressed including the circumstances which can result in financial hardship are silent in the policy of financial hardship. No process in place to address debt management and recovery in relation to account affected by family violence. — [5(1) (g)]: No information about the process for requesting written evidence if written evidence were required. 	<p>We recommend that the Corporation:</p> <ol style="list-style-type: none"> 1. Review its Family Violence Policy to include the following information: <ul style="list-style-type: none"> - Information to customers on external services through which the customers can receive support; - Process to identify accounts of customers affected by family violence without requiring customers to repeat the details of the issue; - Process by which information provided by customers regarding family violence are protected; and - Process by which payment difficulties are addressed in circumstances of financial hardship. 	<p>Management Comment</p> <p>The Corporation will review the Family Violence Policy to include the following.</p>
		<p>Agreed Action</p> <ol style="list-style-type: none"> 1. Information on external services through which the customers can receive support. 2. The process to identify accounts of customers affected by family violence without requiring customers to repeat the details of the issue. 3. The process how information provided by customers regarding family violence is protected. 4. Information on how payment difficulties are addressed in circumstances of financial hardship.
		<p>Responsible Officer</p> <p>Head of Customer Billing Operations</p>
		<p>Date of Implementation</p> <p>30 June 2023</p>



Finding Reference: 25/2022		Rating: B2
Observations	Recommendations	Management Comment
<p>Legislative Obligations (197):</p> <p><i>When a customer affected by family violence first contacts a licensee about a particular matter relating to the family violence, the licensee must inform the customer of the existence and operation of the licensee’s complaints procedure under clause 46 of the Water Services Code of Conduct (Customer Service Standards) 2018.</i></p> <p>Observations:</p> <p>This obligation was added the Water Compliance Reporting Manual on the 4 March 2021. As per Section 5 (2) of the Code, the policy must be in place by the 9 June 2021. PCY395 Family Violence Policy /113971715 was published to the Corporation’s CorDocs on 30 March 2021.</p> <p>Our enquiry indicated that that the Financial Support team do not provide information on the Corporation’s customer complaints process in their first interaction when a customer discloses domestic violence. This is due to the sensitivity of calls received that are related to family violence, in which the conversation does not always lend itself to notifying the customer about the complaints handling procedure.</p> <p>We consider the impact on customers, if any, would be minor.</p>	<p>We recommend that the Corporation:</p> <ul style="list-style-type: none"> - Implement an integrated approach to the complaint training process focussing on matter relating to the family violence in particular informing the customer of the existence and operation of the Corporation’s complaints procedure. 	<p>The process to inform customers impacted by family violence of the Corporation’s complaints procedure is scheduled for review.</p> <p>The Corporation will undertake the following.</p>
		<p>Agreed Action</p> <p>1. Review the complaints procedure and conduct necessary training to focus on family violence, in particular informing the customer of the existence and operation of the Corporation’s complaints procedure.</p>
		<p>Responsible Officer</p> <p>Head of Customer Service</p>
		<p>Date of Implementation</p> <p>30 June 2023</p>