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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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13 October 2017

Our reference: RTIO-AM-0187165

Dear Paul

Rio Tinto Iron Ore submission to Draft Decision of the 2016-17 Review of the *Water Services Code of Conduct (Customer Service Standards) 2013*

Thank you for the opportunity to provide a submission on the above Draft Decision.

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 (Code)* and this submission outlines our position on issues of key importance.

Key Issues

Part 1 of the Code - Preliminary

1. *Clause 4(3) - Provision of services without charge*

Rio Tinto strongly supports the removal of billing, payment, the restriction of supply following non-payment of a bill and the provision of billing and payment information obligations from licensees who do not charge for water services as they are not applicable in this instance.

Part 3 of the Code – Billing for water services

2. *Clause 10(2) – Maximum billing cycled for bills usage charges*

Rio Tinto would prefer that the maximum billing cycle for usage bills remains as six months and not be reduced to four months. This is due to Rio Tinto supplying water services in areas that are affected by extreme weather events. Due to this, there is a risk that the manual meters cannot be read and therefore a billing cycled could be extended beyond the proposed four month cycle.

3. *Including the price of water on bills*

Rio Tinto does not support the inclusion of information on when a customer will move to a higher tariff or revert back to the lowest tariff on bills as this will be of marginal benefit to the customer, and would result in additional information on bills, possibly making them overly complex.

Part 4 of the Code – Payment for water services

4. *Clause 21(1)(a) – Direct debit*

Currently a large proportion of Rio Tinto's customers are utilising direct debit and Rio Tinto would continue to provide these services on a voluntary basis.

5. *Deferred charges*

Rio Tinto supports additional requirements to be included in the Code that a licensee must follow when setting the conditions of a customer's payment plan or other arrangement, as this could standardise customer treatment across all licensees. Rio Tinto also encourages the development of further guidelines to standardise the conditions of customer's payment plans and arrangements. This additional requirement would be further supported by the amendment proposed in Clause 27, as below.

6. *Clause 27 – Assistance for customers experiencing financial hardship*

Rio Tinto supports additional requirements to be included in the Code that a licensee must take into account when setting the conditions of a payment plan or other arrangement for customers who are experiencing payment difficulties. Rio Tinto considers that the additional requirements for licensees could standardise customer treatment across all licensees. Rio Tinto also encourages the development of further guidelines to standardise the conditions of customer's payment plans and arrangements.

Part 5 of the Code – Restricting the flow of water

7. *Reminder Notices*

Rio Tinto would support the inclusion of the requirement for a licensee to send a customer a reminder notice before they restrict a customer's water supply. Rio Tinto considers that this would allow for clear and transparent communication between customers and Licensee's.

8. *Restriction Notices*

Rio Tinto would support the inclusion of the requirement for a licensee to send a customer a restriction notice seven days before they restrict a customer's water supply. Rio Tinto considers that this would allow for clear and transparent communication between customers and Licensee's.

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 Karyn McDougall, Compliance Advisor on .

Yours sincerely

Theo Muller
General Manager, Acting
Core Services