Operational Policy CTD/002656



1.0 Policy Statement

Lower Murray Water (LMW) provides urban water services to 12 townships via 9 treatment plants to over 35,000 households and businesses along the Murray River from Koondrook to Merbein.

All urban water supplied is measured by meters meeting Australian standards. How much water customers use is referred to as 'consumption' or 'water by measure'.

For residential pricing, LMW use a 3-tiered water tariff system. This means the more water you use, the more you pay. For example, if a customer uses more than 50 kilolitres (kL) of water for their garden, they pay more for the extra water. They may also pay more for using extra water during the hotter months of the year.

This policy outlines LMW's policy for managing customer's high consumption and any bill relief that may be applied by LMW.

2.0 Purpose

To define Lower Murray Water's (LMW) policy for processing enquiries relating to high urban water consumption and approval of adjustments to their Water by Measure.

3.0 Scope

Applies to all urban residential customer water consumption enquiries including undetected leaks and unexplained high usage and provides a mechanism for approving consumption compensation.

Where there has been a long-term leak that could have been corrected earlier this policy will not apply.

4.0 References

- Water Act 1989
- EWOV's High Water Bills Information for Residential Customers Fact Sheet
- VicWater Guideline for Unexplained High Usage and Undetected Leak Enquiries 2020 (HULA)

5.0 Definitions

Term/Abbreviation	Description	
A one-off unexplained high consumption event	Where, after working through EWOV's High Water Bills Information for Residential Customers Fact Sheet and ruling out all of the reasons highlighted, a customer genuinely cannot account for a limited period of high usage over a single quarter. Unexplained usage is often attributed to either water theft or a one-off event that the account holder has not been made aware of.	
Customer	A person who is the owner, tenant and/or occupier of a property which is:	
	 connected to a system owned by LMW an occupier of a property that is connected to LMW's system and is liable for the usage charges not connected but having available for connection a system owned by LMW and having paid applicable fees and charges to LMW or 	

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	declared to be a serviced property by LMW in accordance with the Water Act 1989. Persons who have entered into a separate written agreement with LMW for water supply services are also customers.	
Customer complaint	A written or verbal expression of dissatisfaction about an action, proposed action or failure to act by LMW, its employees or contractors.	
EWOV – Energy & Water Ombudsman Victoria	An independent industry based Ombudsman.	
Financial hardship	May arise as a result of or be identified as:	
	 a sudden change in circumstances (unemployment, ill health, separation, a death in the family, a loss resulting from an accident) low income a large, unexpected expense of an essential item a customer with a drug, alcohol or gambling addiction a customer eligible for a Government funded concession (eg, Health Care Card, Social Security Benefit, etc.); A customer who has previously applied for a Utility Relief Grant; and/or A customer whose payment history shows that they have 	
	had difficulty meeting LMW's payment terms in the past.	
Handheld meter reading device (HHU)	An electronic device used by meter readers to capture meter readings in the field.	
High consumption	A larger than normal amount of water usage measured in kilolitres (as opposed to an increased dollar amount) that is not a leak but still constitutes a significant increase when compared to the customer's normal usage for the same time over previous years. It may be explainable by the customer after referring to EWOV's High Water Bills Information for Residential Customers Fact Sheet.	
HULA	VicWater Guideline for Unexplained High Usage and Undetected Leak Enquiries 2020	
Leak	A leak which is visible under normal inspection conditions and procedures.	
LMW	Lower Murray Water	
Non-residential customers	Properties connected to LMW's water system and paying a non-residential tariff	
Property owners' infrastructure	Includes the customer's pipes, backflow prevention devices and other equipment of the customer connected to the system.	
Read type	The category of the meter reading in rating data base. Adjustment Comment Estimation Final Read Reading	

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Residential customers	 Own and occupy a residential serviced property connected to LMW's water systems. Own a residential serviced property connected to LMW's water systems, but do not occupy it – (eg a landlord or an owner of an unoccupied property) Occupy a residential serviced property which is connected to LMW's water system and are liable to pay water usage – (eg a tenant) 	
RMS	Records Management System	
Rural customers	Own and/or occupy a property connected to LMW's rural irrigation systems.	
Service	A water supply service including a non-potable supply service, a recycled water supply service or a wastewater service.	
Service tariff	A tariff charge associated with the supply of a LMW service e.g. water, wastewater and trade waste.	
Undetected Leak	A leak which is not visible under normal inspection conditions which requires special assistance to locate.	
	An Undetected Leak is usually a burst pipe either underground, under concrete or underneath a building where no visible sign of water loss could have been reasonably detected (eg dampness or excessive growth in the vicinity or on the surface above the ground) by the customer prior to LMW issuing an account.	
Urban Water	Potable water supplied by LMW	
URGS – Utility Relief Grant Scheme	A financial concession for a utility account available through the Department of Health and Human Services Victoria for customers experiencing hardship. Generally only granted once every two years.	
Validation request	A request generated by a handheld meter reading device as a result of a meter reading exceeding set consumption parameters.	
Water by Agreement (Private Main)	A property serviced by a private water main extension and/or where the customer is required to enter into a Supply by Agreement with LMW for the supply of water. This is defined as a private water supply service which provides water to one or more customers' properties, where LMW water main does not front or pass through the customer's property. The maintenance and responsibility of the private line remains with the property owner.	
Water by measure	The charge associated with the measured volume of water as registered by a water meter.	
Water Corporation	Is Lower Murray Urban & Rural Water Corporation. This policy only applies to the urban operations of the water corporation.	
System	LMW's physical infrastructure for providing a water supply service, a recycled water service or a wastewater service.	

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6.0 Policy/Guidelines

6.1 Eligibility Criteria

Eligible customers are urban residential customers who are in financial difficulty and require support, or where the high consumption may cause additional risk of entering financial difficulty. Only one water bill rebate will be offered per customer, per property per five year period for eligible water loss events.

6.2 Exclusions

- Customers who have been granted URGS for a maximum of \$650.00 within the past two years.
- Non-residential Customers.
- Not for profit organisations Schools, hospitals, nursing homes, churches, charitable, outdoor sporting and recreational groups.
- Rural customers.
- Customers with a detectable leak are excluded from any reduction on their account as
 it is the customer's responsibility to regularly inspect their property, maintain their
 internal plumbing and take immediate action when a leak is detected. LMW will take
 into consideration any special needs of a customer that may impede their ability to
 detect leaks.
- Customers with undetectable leakage from galvanised iron pipes are excluded as galvanised pipes and fittings are likely to be corroded and should have been replaced prior to the leakage occurring.
- Water by agreement customers are excluded as the agreements are so varied across the industry and may not be fronted by a main.
- The above exclusions may be waivered or altered with the approval of the Senior Manager Customer Operations in extreme cases.

6.3 Obligations of Customers

- 6.3.1 All reasonable effort must be taken by the owner to ensure that the property's water infrastructure is maintained in good working order. This includes repairing leaks in a timely manner to conserve water and reduce potential costs.
- 6.3.2 Tenants have an obligation to report a suspected leak to the owner/managing agent.
- 6.3.3 The repair of leaks on a property's water infrastructure must be undertaken by a plumber that is licensed or registered with the Victorian Building Authority (VBA). Customers must provide a plumbing report to help substantiate the claim and to ensure that the works undertaken meet current plumbing standards.
- 6.3.4 Where eligible, customers are encouraged to investigate an URGS application and repayment program in conjunction with LMW's Customer Support Policy (CTD/003413). Note: the customer may receive a greater leak allowance through URGS compared to the LMW offer. (see LMW's Customer Water Consumption Enquiry Procedure Urban CTD/000877)
- 6.3.5 Customers are required to make an application in writing within 90 days from the due date of the billing period which substantiates the high-water usage.
- 6.3.6 Customers are required to co-operate with LMW and provide information as requested to resolve the claim.
- 6.3.7 In accordance with section 273A of the Water Act 1989, the occupier of a property is liable for the costs of all water supplied to the property.

6.4 Obligations of Lower Murray Water

- 6.4.1 LMW is to communicate sustainable water conservation initiatives to assist customers in managing their water use.
- 6.4.2 Assist with high consumption enquiries by educating customers as to the following processes:
 - detecting leaks, (i.e. 2 hour tests, overnight tests)

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- investigate URGS or concessions they may be eligible for
- communicate payment arrangement options within the customer's capacity to pay, including application of the LMW Customer Support Policy (CTD/003413).
- 6.4.3 LMW will assess any application by the customer for a leak allowance within 10 business days based on the evidence provided (i.e. Report from registered plumber and/or evidence provided to substantiate the claim).
- 6.4.4 Provided the customer has met all their obligations, calculate an adjustment as per the minimum guideline for calculating undetected leaks and high usage allowance as per the HULA.
- 6.4.5 Communicate the adjustment to the customer. Include information on eligibility on future high consumption requests as per LMW policy (one every five years per property, per customer). All customers should be notified about their obligations.
- 6.4.6 If a property leak has not been repaired following consultation with LMW, LMW may issue a notice to repair the leak pursuant to Section 150 Notice to Repair and Section 151 Notice of Contravention of the Water Act 1989. No adjustment will be considered until the leak is repaired.
- 6.4.7 Process adjustment in accordance with the recommended minimum guidelines set out below.
- 6.4.8 LMW should notify the customer of the high usage either prior to or at the time of issuing the account to ensure that the customer is aware of the issue as soon as practicable.
- 6.4.9 LMW should actively advise customers of any rebates or grants available to further promote water conservation and maintenance of customer water assets. LMW should assist customer education by running education campaigns on how to read meters, customer responsibilities, regular meter readings, and how to check for leaks.

6.5 Approval of adjustments

Following an investigation and assessment of the customer request, a decision on financial reduction can be reached. This decision needs to be authorised by an appropriate officer delegated under LMW's Instrument of Delegation.

6.6 Calculation Guidelines

 All adjustments will be calculated and applied based on HULA and LMW's Undetected Leak Procedure (CTD/000878)

7.0 Supporting Documentation

Doc ID	Title
CTD/000878	Undetected Leak Procedure (Urban)
CTD/000877	Customer Water Consumption Enquiry Procedure (Urban)
CTD/003413	Customer Support Policy
CTD/001360	Customer Charter Urban

8.0 Roles & Responsibilities

Position	Responsibility
Team Leader Urban Customers	Customer enquiry and management
Team Leader Revenue	Rebate processing

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Customer and Stakeholder Liaison	Investigation and calculations
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9.0 Document History & Review

It is the responsibility of the Custodian of this policy to ensure it is reviewed as per the review due date listed in the table below and the controlled document metadata within the Records Management System (RMS).

Version	Date Approved	Review Due Date	Review Notes
А	March 2014	March 2016	Document reformatted, minor corrections and titles changed to reflect 2017 Org Chart. Item added to 6.0 exclusions (URGS customers).
В	June 2017	June 2019	Titles changed to reflect 2020 Org Chart
С	July 2020	July 2021	Changed to new policy format, titles changed to reflect org chart custodians changed as per Governance Framework and changed to reflect the Effective Language Guide. Information removed that does not relate to a policy
D	January 2024	January 2027	

For users of this policy, please alert the Custodian to the need for review if any amendments are required to this policy before the review due date. Only Custodians or their delegates may make amendments, and these must be authorised by the Approver before distribution to LMW.

See the controlled document "Notes" in the RMS for amendments made during reviews.

Custodian	Approver
Senior Manager Customer Operations	General Manager People & Customers
Subject Matter Experts	Endorsed By
Urban Customer Team Revenue Team Metering Team	N/A

10.0 Location of Document

- Records Management System
- Intranet
- Internet