

City Of Greater Sudbury

Water/Wastewater Complaint and Adjustment Process

Part of the Water and Wastewater Policy and Procedures Manual

Water/Wastewater Complaint and Adjustment Process

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**CITY OF GREATER SUDBURY
POLICIES AND PROCEDURES**

DEPARTMENT:

Growth and Infrastructure
Corporate Services

SECTION:

Water/Wastewater

TITLE:

Water/Wastewater Complaint
and Adjustment Process

APPROVED BY:

General Manager, Growth and Infrastructure

DATE:

May 16, 2019

1.0 PURPOSE

The purpose of this process is to document the delegation of authority and protocols from the General Manager, Growth and Infrastructure to his/her staff as it relates to the Water/wastewater Rates and Charges By-law.

1.1 Definitions

Customer Relationship Management System {CRM}: software utilized to manage customer complaints and provides employees the ability to action and view the status of complaints.

Adjustment: An alteration to an original invoice for any reason. See section 2.0 for Adjustments provided through the WWW By-law.

Back billing: A billing made to collect charges incurred in a previous billing period and may be an adjustment as a result of an error or based on additional information that has come to light.

Complaint: A communication whether verbal or written {electronic or paper} from a customer that a situation is unsatisfactory or unacceptable.

High water bill: An invoice that indicates 100% higher than the same period in the prior year or if not available the average of the consumption over the previous month water charges that may be caused by a variety of reasons such as, but not limited to: plumbing issues, theft of service, change in usage, running water to clear, etc.

Low water bill: An invoice that indicates 85% lower than the same period in the prior year or if not available the average of the consumption over the previous month water charges that may be caused by a variety of reasons such as, but not limited to: stopped meter, incorrect meter readings, etc.

WWW By-law: Refers to the Water and Wastewater Policy and Water Wastewater Rates and Charges in General and for Special Projects By-law, which is updated/replaced on an annual basis.

2.0 POLICY

This process applies to all Employees of CGS and to Greater Sudbury Hydro Plus Inc. who are responsible for providing services as they relate to water/wastewater.

This process is established to document the protocol and information requirements to be able to manage complaints and propose adjustments as required. Per the WWW By-law the General Manager of Growth & Infrastructure {GM} can authorize the following:

Section 17 Adjustments:

To adjust billing and establish protocols to process a request for an adjustment under the stated by-law.

Section 19 Discretionary Adjustment:

To make adjustments to the water/wastewater charges when it would be unduly burdensome or otherwise unreasonable in the circumstances, and establish protocols for required supporting material to determine if the adjustment is warranted.

Section 20 Water Consumption Adjustment – Result of Damaged Meter, etc.

To make adjustments to the billing for errors in water consumption billing due to damage to a meter.

Section 24 Water Rates and Charges Adjustments:

To authorize an adjustment if error in city records due to any of the following:

- size of meter,
- water or wastewater service,
- number of dials, or
- multiplier.

Any adjustment granted is intended to provide financial relief to the customer based on the specific situation in a fair and consistent manner. This remedy would normally occur once per owner per meter.

3.0 RESPONSIBILITIES

In accordance with the WWW By-law responding to complaints is a responsibility of Water/Wastewater Services (WWW). Finance and Greater Sudbury Hydro Plus Inc to support WWW in resolving complaints, arranging repayments (where required) and processing adjustments. All staff will make every effort to respond to Complaints in a timely, efficient and effective manner.

3.1 The Supervisor of Accounts Receivable is responsible to:

- 3.1.1 Assign tasks in CRM to applicable staff.
- 3.1.2 Coordinate the collection of information from WWW staff and GSHP as required.
- 3.1.3 Submit a proposed draft response with supporting documentation to the Manager of Accounting and the applicable Director responsible for the relevant area and or designate.

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- 3.1.4 Resolve or obtain information as required by the Manager of Accounting, the applicable Director responsible for the relevant area, GM or Treasurer for prompt resolution of the complaint.
- 3.1.5 Submit a proposed draft response with supporting documentation to the GM.
- 3.1.6 Submit letter of resolution to the customer for the GM once approval has been obtained in accordance with the section 4.5.2 (Response approval and notification).
- 3.2 The Manager of Accounting is responsible to:
 - 3.2.1 Review draft responses and provide comments or approval in a timely manner.
 - 3.2.2 Advise the Treasurer of the Complaint and proposed resolution.
- 3.3 The Director of Water/Wastewater Services {Director of WWW} and/or Director of Linear Infrastructure Services {Director of LIS} is responsible to:
 - 3.3.1 Direct work to be performed/investigated by their staff to verify the accuracy of the complaint in a timely manner.
 - 3.3.2 Review draft responses and provide comments or approval in a timely manner.
 - 3.3.3 Advise the GM of the Complaint and proposed resolution.
- 3.4 The Manager of Compliance and Operational Support and/or Manager of Distribution & Collection and/or the Water Meter Compliance Officer is responsible to:
 - 3.4.1 Accept complaints and assign tasks in CRM to respective staff.
 - 3.4.2 Provide verbal response to complainant if able to resolve in one call and document complaint and resolution in CRM.
 - 3.4.3 Provide responses in CRM and in the Northstar system if applicable and supporting documentation relating to complaints in a timely manner to the Supervisor of Accounts Receivable as requested.
 - 3.4.4 Perform, or direct work to be performed/investigated by their staff to verify the accuracy of the meter or substantiate claims that relate to water/wastewater infrastructure.
 - 3.4.5 Summarize the work performed and result of the investigation which will be communicated to their respective Director (see section 3.3).
- 3.5 The GM is responsible to:
 - 3.5.1 Direct work to be performed/investigated by their staff to verify the accuracy of the complaint in a timely manner.
 - 3.5.2 Respond to customer with proposed resolution or comments in a timely manner.
 - 3.5.3 Approve adjustments in accordance with the following sections of the WWW By-law: 17, 19, 20 and 24).

3.5.4 Consult with the Treasurer before approving settlement agreements.

3.6 The Treasurer is responsible to:

3.6.1 Provide guidance to the GM in accordance with section 2(1) Delegation of the WWW By-law.

3.6.2 Approve repayment arrangements in accordance with the following sections of the WWW By-law: 18(2), 24(3).

4.0 PROCESS

There are various methods through which customers may make a complaint. This process will streamline those complaints to ensure that:

- The necessary information is obtained to complete an investigation;
- An investigation is conducted and documented;
- The customer receives regular updates, based on standard timelines;
- A resolution is provided to the customer in a clear and concise manner.

All Complaints will be managed and documented in CRM.

4.1 Complaints that can be resolved in one communication

When the Complaint can be resolved in one communication the response to the Complaint can be communicated via telephone or email by the Employee receiving the Complaint. The response will be entered into CRM and added to the account in Northstar where possible.

If the customer is not satisfied with the response and further action is required follow section 4.2.

4.2 Complaints that require investigation

Complaints that cannot be resolved in one communication need to be streamlined to ensure that the relevant staff participates in the investigation and response to the Complaint.

If the Complaint relates to a billing issue, customers should be directed to GSHP as the City of Greater Sudbury has contracted out billing services to GSHP. GSHP is expected to respond to Complaints regarding billing. The chart below indicates Complaints that can be redirected to CGS. In all other cases GSHP is expected to provide resolution to the Complaint.

Area	Reason
Meter Shop	Suspected Stopped Meter
	Damaged meters
Supervisor of AR	Customer wants their Complaint escalated as they are not satisfied with GSHP's response. GSHP is to advise customer call 3-1-1 and have their complaint logged in CRM.

4.2.1 Creating Cases

The employee receiving the complaint should endeavor to obtain the following

information from the customer:

- Name of customer;
- Property address;
- Description of issue;
- Date issue occurred (or period if length of time).

For customers requesting an adjustment as per Unduly burdensome/hardship section of the by-law, additional information should be requested as noted in section 4.4.5 - Discretionary Adjustments - Unduly burdensome/hardship.

If the employee has access to the CRM, they are to enter the information from the customer and open a Case in CRM. If the Employee does not have access to CRM the Employee will obtain the necessary information and contact 3-1-1 to create the Case in CRM. Cases created in CRM, relating to WWW are to be assigned the Case Type: Water Billing Issues. The code will assign the task to the Supervisor of AR who will redirect as required.

4.2.2 Investigation

CRM, or as assigned by the Supervisor of AR, Director or GM, will send an email notification to the employees assigned to investigate and provide information required to draft a response to the Complaint. The Employee will attach the documentation in CRM and where possible, add it to the Northstar account. The staff required to participate in the investigation is dependent on the nature of the Complaint as set out in Appendix A - Categories.

4.2.3 Response

The Supervisor of AR will review all of the responses and prepare a memo to the GM with a recommendation(s) and include a draft response letter for signature. The GM may request additional information or changes to the letter. The letter is returned to the Supervisor of AR who will provide the City's response to the customer, add the response letter in CRM and to the account in Northstar. Employees involved in the case are responsible to check CRM for resolution.

4.2.4 Timeline

If the investigation and/or response extend beyond a billing cycle, the GM may direct GSHP, through the Supervisor of AR to suspend collection on unpaid accounts until resolved.

4.3 Categories

Appendix A denotes general categories, staff required for investigation and applicable by-law reference. The list is not exhaustive; therefore if the Complaint doesn't fit into a particular Type it will be categorized as Miscellaneous.

The Supervisor of AR will contact the employee best suited to have the information relating to the Complaint. These will be addressed on a case by case basis.

4.4 Financial Resolution

Complaints may provide for financial resolution in one of the following fashions:

- Adjustment to billing
- Retroactive adjustment
- Repayment arrangement
- Settlement agreement
- Unduly burdensome/hardship

Once the investigation has been completed a response letter detailing any financial resolution will be issued to the customer in accordance with section 4.5 (communication to customer).

4.4.1 Adjustment to billing

The Supervisor of AR will recommend adjustment to a specific bill (or multiple as the case may be) based on the information at hand in accordance with the WWW by-law and this process.

4.4.2 Retroactive adjustment

A retroactive billing adjustment will be calculated in accordance with the WWW by-law (i.e. up to two years retroactive). The calculation will be performed by the Supervisor of AR or GSHP depending on the complexity.

4.4.3 Repayment arrangements

In most cases repayment arrangements for water/wastewater services billed by GSHP must be arranged with GSHP. In some circumstances, where an error has occurred by the City, resulting in under billing, the Treasurer may negotiate a repayment arrangement and direct GSHP to process the arrangement in Northstar.

4.4.4 Settlement agreement

The GM, in consultation with the Treasurer, may negotiate a settlement agreement with a customer. This is usually a result of a large adjustment that may be contentious and would need full and final resolution.

4.4.5 Discretionary Adjustments - Unduly burdensome/hardship

Customers that request application of Section 19: Discretionary Adjustment of the by-law are required to provide the following information by sending an e-mail to accounts.receivable@greatersudbury.ca. The e-mail should include the reason for the high bill, the steps taken to rectify the issue and proof that the issue has now been resolved (receipt from plumber, purchase of parts, 2 meter readings, 2 weeks apart)

Customer type	information required	Earnings	Maximum relief ³
Individual	- Notice of assessment from most recent year and - Number of family members in the home	\$LICO ¹ or less	100%
		Greater than \$LICO ¹	50%

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Customer type	Information required	Earnings	Maximum relief ³
Not for profit/ charitable organization / institutional	<ul style="list-style-type: none"> - Financial statements (audited or reviewed) from most recent filing period - Registered Charity Information Return Summary (T1242E) OR - Corporate Notice of Assessment (not for profit) 	\$50,000 ² or less	100%
		Greater than \$50,000	50%
For profit/ business / commercial	<ul style="list-style-type: none"> - Copy of financial statements (audited or reviewed) and - notice of assessment from most recent filing period 	Not applicable	50%

¹ Per the Statistics Canada – Table 11-10-0241-01, population 100,000-499,999, most recent year available

<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110024101>.

For individuals, if there are two adults in the home, then the notice of assessment must be provided for both.

² Per CRA, small supplier limit for HST purposes.

³ Maximum relief represents the maximum credit that could be issued relating to a specific period or bill. The maximum relief would be calculated based on consumption for a specified period less consumption for same time period in the previous year. Difference in consumption multiplied by the rate in table would be maximum relief amount.

To note that the earnings thresholds above do not guarantee financial relief, the earnings thresholds are used to calculate the maximum relief that may be considered.

Finance will review the information submitted to assess:

- a) Ability to pay/liquidity: cash/investments available and cash flow capabilities
- b) Financial sustainability:
 - i. for individuals: earnings
 - ii. for Not for Profit/Charity/Institutional: amount of reserves, net assets
 - iii. for Profit/Business/Commercial: profitability, retained earnings.

In addition, the City will also consider:

- a) Whether the bill is a High Water Bill,
- b) The cause of the High Water Bill and the customer's participation in resolving the issue (i.e. repair damaged pipe) in accordance with By-law 2010-214 *Respecting the supply of water, the management and maintenance of the waterworks systems of the City*; and
- c) The history of similar requests (where applicable).

4.5 Response to customer

When following process 4.2 - Complaints that require investigation, the customer is to receive a written notification of the City's response to the Complaint. Template response letters are utilized to ensure consistent messaging. If there is no template that properly reflects the nature of the Complaint the following items at minimum should be included in the response letter:

- Nature of Complaint
- Summary of investigation performed
- Reference to applicable section of WWW by-law
- That it is a final decision
- CGS conclusion.

4.5.1 Timelines

Customers should receive resolution to their Complaint in a timely manner. When the City is unable to obtain supporting information in a timely manner, it is the responsibility of the staff who was assigned the Case ID to provide an update to the customer, with an updated resolution date, to ensure good customer service. The staff is to indicate in CRM that communication with the customer has occurred.

The City expects a standard response time to be applied by all and the following standards are recommended:

Description	Timeline – Simple issue	Timeline – Complex issue
Acknowledge receipt of complaint	2 business days	2 business days
Provide update of status if resolution not obtained	20 business days	30 business days
Response letter	20 business days	30 business days

Note: A complex issue is identified as requiring more than one department to participate in the investigation or requires additional communication or information from the customer to complete the investigation.

4.5.2 Response approval and notification

As the responsibility for complaint resolution rests with the GM, the Supervisor of AR will obtain the signature of the GM. Once this is obtained the Supervisor of AR will send the letter via mail or email to the customer and mark the CRM Case ID as complete. The resolution letter is to be attached in CRM to the case and to the water account in Northstar. If there is an adjustment to be made to the account, the Supervisor of AR will put a call on the water account advising GSHP to apply the adjustment to the account.

Appendix A - Categories

Type	Description	Staff involvement	By-law section
Billing Questions	Any billing question {regular items}	GSHP	Section 3: Water Consumption Charge – Meter Installed
Construction Flat	Charge applied when water and/or wastewater connection is approved by City until meter is installed	Engineering {permit} Water/wastewater {approval}	Section 4(1): Water Consumption Charge – Before Meter Installed – Construction Period
Damaged meter	Meter is found to be damaged Back billing due to meter found to be damaged	Meter Shop Supervisor of AR GSHP	Section 19: Discretionary Adjustment (i.e. Unduly burdensome)
Dirty Water	High bill due to running water to clear for extended period of time (i.e. more than 1 day)	Supervisor of Accounts Receivable, Manager of Distribution & Collection, Operations Engineer – Distribution & Collection	Section 3: Water Consumption Charge – Meter Installed
Error in billing – incorrect number of dials	Meter installed incorrectly entered in billing system	Meter Shop GSHP Supervisor of AR	Section 20 (1): Water Consumption Adjustment – Result of Damaged Meter
Error in billing – meter reading incorrect	Reading taken is incorrect	GSHP Meter Shop (as required) Meter Reading Contractor (as required)	Section 24: Water Rates and Charges Adjustments
Error in billing – multiplier for compound meter incorrect	The compound meter info provided was incorrect or not properly entered in the billing system	Meter Shop GSHP Supervisor of AR	Section 3: Water Consumption Charge – Meter Installed
Error in billing – under (over) billing	Account under (over) billed because of any other error not already listed	GSHP Meter Shop Supervisor of AR	Section 17: Principles of Adjustment
Frozen service	1) Run water (minimum for winter 2) Run water (not 1 above) 3) Frozen service	1) GSHP/ Meter Reading Contractor, w/ww select date, lower service, Supervisor AR	Section 3: Water Consumption

Type	Description	Staff involvement	By-law section
		2) W/WW, 3-1-1, Supervisor AR 3) 3-1-1 (then separate process followed)	
High Water Bill	Customer should have been listed on GSHP variance report and GSHP should have performed steps to advise customer or resolve issue.	Supervisor of AR GSHP Meter Shop (as required) Meter Reading Contractor (as required)	Section 5(1): Water Fixed Rates
Meter Size/Line size	Monthly fixed charge is based on line size and/or meter size	Meter Shop	Stop Charge
Stopped meter	Identified through billing - Meter found to be stopped {0 consumption}	GSHP Meter Shop	No adjustment unless notified by CGS to run the water for an extended period of time
Temporary water service (Bibs)	Related to construction projects	Engineering, Construction Services, consultant, Meter Shop	Section 24: Water Rates and Charges Adjustments
Temporary water service (Bibs)	Due to frozen service	Water/Wastewater, Meter Shop, Supervisor of AR	Section 24: Water Rates and Charges Adjustments
Water shut off	This can be a shut off for water arrears or called in by owner	GSHP Accounts Receivable Water/wastewater (as required) Meter Reading Contractor {arrears}	Section 24: Water Rates and Charges Adjustments
Miscellaneous		Supervisor of AR GSHP Water/waste water Meter Shop (as required) Meter Reading Contractor (as required) Linear Services (as required)	