



Water is life

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Fax: (876) 929-1480 | <input type="checkbox"/> 4 Marescaux Road
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977-5000
Fax: (876) 927-1870 | <input type="checkbox"/> 231B Old Hope Road
Kingston 6
Tel: (876) 977-2496
(876) 977-9330
Fax: (876) 977-2708 | <input type="checkbox"/> 2A Manhattan Road
Kingston 5
Tel: (876) 929-3540-5
Fax: (876) 968-8247 |

November 29, 2022

Miss Thalia McPherson
Office of Utilities Regulation
36 Trafalgar Road
Kingston 10

Dear Miss McPherson:

Re: **OUR's Draft Corporate Business Plan and Budget 2023/2024 – 2026/2027**

Reference is made to the Office of Utilities Regulation's (OUR) email of Friday November 18, 2022, where the National Water Commission (NWC) was invited to submit comments on the OUR's Draft Corporate Business Plan and Budget 2023/2024 – 2026/2027.

The comments from the NWC are detailed below:

Project Title: NWC 2022 Rate Review
Project Description: In 2019 December the OUR issued the NWC Interim Determination Notice. This was the expectation that NWC would submit an application in time for new rates to be approved 24-month later. However, the NWC has indicated that it plans to submit its application in 2022 December.

NWC's Comments: There are outstanding deliverables which will result in a delay in the submission of the 2022 tariff proposal. The revised date for submission is June/September 2023.

Project Title: NWC's Billing Cycle Review
Project Description: The OUR is aware through complaints received, that there are instances in which utility customers receive monthly bills with billing cycles of varying duration. As a result, the NWC bills customers for a different number of days, which may be less than or greater than 31 days. Additionally, the NWC stops billing an account when it disconnects a supply. As such, the fixed Service Charge that is determined by the OUR may be varied on the NEC bill based on the number of days applicable to the billing period. The NWC advises that it prorates the Service Charge based on the number of days in the billing cycle since it does not collect a Security Deposit. This project is intended to review the NWC's Billing Cycle in which the following issues will be considered:

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1. Defining/establishing the number of days in a month for NWC's billing.
2. Assessing the reasonableness of the NWC prorating the OUR approved fixed Service Charge, based on the number of billing days.
3. Assessing the reasonableness of allowing the NWC to charge a Security Deposit.
4. Assessing the reasonableness of the NWC's practice to stop billing an account upon disconnection.

NWC's Comments: The NWC is recommending that the following be included in the Review of the Billing Cycle:

- (1) An assessment of the capabilities of the Billing System to facilitate Fixed Billing Periods.
- (2) Assess the rationale for varying billing dates.

The NWC thanks the OUR for giving us the opportunity to comment on the Business Plan and hope consideration be given to the recommendations.

Yours sincerely,
NATIONAL WATER COMMISSION



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Latoya Jackson-Morgan (Mrs.)
Vice President – Enterprise Development & Performance Monitoring (Acting)