NATIONAL WATER COMMISSION
Water is life

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February 5, 2026

[redacted]

Office of Utilities Regulation,
3rd Floor PCJ Resource Centre
36 Trafalgar Road
Kingston 10

[redacted]

Re: Review of the Billing Cycle of the National Water Commission

[redacted]

Reference is made to your email dated October 15, 2025, requesting feedback on the review of the Billing Cycle for National Water Commission (NWC).

The NWC applauds the Office of Utilities Regulation (OUR) continued efforts to ensure the quality of services being given to customers of the utility companies, including the NWC. Likewise, the NWC is committed to ensuring that it provides its customers with the quality of service they expect and deserve. The NWC's responses to the questions raised in the Consultation Document are outlined in appendix 1 attached herein.

As a general observation, the NWC notes the OUR's inferred suggestion that the basis of its received customer complaints is predicated on issues relating to an extended billing cycle. However, based on our internal review and information; it is the NWC's position that billing concerns raised by customers to the OUR and subsequently sent by the OUR to the NWC for resolution predominately relate to contesting applied charges to the relevant account rather than the Days of Service (DOS) of a billing cycle.

February 4, 2026

[redacted]

Office of Utilities Regulation,

Re: Review of the Billing Cycle of the National Water Commission

Further, as the objective of the OUR's review is to identify and implement a reasonable maximum limit on the number of DOS in a billing cycle; the NWC highlights that its maximum DOS limit of thirty-three days is in our view reasonable. The above mentioned maximum DOS limit supports the operational needs of the NWC and ultimately yields to the benefit of the customer. It is imperative that the operations of the NWC be viewed on its own merit and not against the background of our regulated counterparts who have varying operational procedures and financial context.

Sincere thanks to the OUR's Team for the opportunity to review and provide the NWC's views and feedback on the proposed changes. We hope that due consideration will be given to our recommendations and welcome the opportunity to meet with you to discuss this very important matter in further details.

Kind regards,

[redacted]

[redacted]

NWC'S RESPONSES TO CONSULTATION QUESTIONS POSED

Question	NWC's Response/Comments
Billing Cycle Assessment:	
Question 1: Considering the impact on the monthly charges, what are your views on NWC's current practice to prorate the Fixed Monthly Service Charge depending on the number of billing days?	While there are a number of reasons for prorating charges based on the Days of Service (DOS), the proration of the Fixed Service Charge is normally done in instances where customer accounts are affected by billing activities whether due to internal (NWC) or external (Customers) factors. It should be noted that the rationale for this is always to the benefit of the customer, where he/she is charged/ billed **only** for the period of service.
Question 2: What are your views on maintaining a monthly billing cycle standard for NWC?	The NWC is in support of maintaining a Monthly Billing Cycle Standard. It should be noted that the Standard Billing Cycle of Twenty-seven to Thirty-three Days, is established and embedded in its Customer Billing System (Banner CX). Any changes to this standard will be at a cost to the NWC, and as such will not be considered at this time.
Question 3: Do you agree that a maximum number of days should be established for NWC's billing cycle? Please provide details to support your response.	As indicated above, the NWC already has and supports the practice of a maximum number of days for its Billing Cycle. The maximum days is currently Thirty-three days. We are aware that there will be instances when the DOS billed for a customer may exceed the maximum days, in instances of New Supplies, Transfer of Accounts and Disconnection of Supplies. However, a review of the NWC's billing for twelve months revealed that less than one percent of the bills generated exceeded the maximum DOS. It should be noted that where this occurs, there are procedures in place to address these anomalies, for example, the billing system will flags all accounts that are over the established DOS for subsequent review and adjustments.

NWC'S RESPONSES TO CONSULTATION QUESTIONS POSED

Question	NWC's Response/ Comments
Question 4: What are your views on defining/restricting the NWC's billing period to no more than thirty-one (31) days? Please provide details to support your response.	The NWC does not support the idea of restricting or defining the DOS to thirty-one days at this time based on the following reasons/ operational challenges: a. The Billing System is relatively new, having been implemented in January 2022. Modification to this system will be costly, and given the NWC's current financial constraints, this would not be prudent. b. The Meter Reading Process is, for the most part, a manual one. Reducing and capping the Billing Period to thirty-one days when balanced against potential challenges (Acts of God, Access to property, violence, civil unrest and other force majeure events) will result in significant changes in the Meter Reading/ Billing Schedule, by reducing the number of days available to collect meter readings; thus increasing the likelihood of customers receiving Estimated Bills. c. Given the manual nature of the Meter Reading Process, restricting the DOS to thirty-one days would result in increased operational costs, as there will be a need to increase the number of Meter Readers to facilitate timely reading of customer meters.