

ENERGY SYSTEMIC ISSUES INVESTIGATED – CLOSED

1 JULY 2013 - 30 JUNE 2014

(In date closed order)

Issue Number	Systemic Issue	Summary	Outcome	Number Affected
1.	SI/2012/119 Energy Retailer	EWOV identified via its case handling, instances where an energy retailer had been issuing duplicate invoices to customers.	The energy retailer confirmed that the issue occurred because the billing cycle frequency was indirectly affected whenever the credit team was making a change to a Time-of-Use account, resulting in multiple bills being issued. The collection process has been amended to ensure that the billing cycle frequency is not impacted and regular system checks are run to ensure there are no impacted customer accounts in the system.	1,760
2.	SI/2013/49 Energy Retailer	EWOV identified via its case handling, instances of an energy retailer incorrectly transferring customers from the Standard Feed-in Tariff (SFIT) to the General Feed-in Tariff (GFIT) without prior knowledge or consent.	The energy retailer confirmed a group of customers who correctly completed SFIT paperwork were incorrectly transferred to GFIT from 1 January 2013. The issue resulted from confusion about the completion of paperwork. The energy retailer confirmed that it is in the process of correcting the issue, which includes returning customers to SFIT, backdating all applicable credits and issuing an	25

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			explanation/apology letter. It confirmed the issue would be corrected by 31 July 2013 and the staff that incorrectly transferred these customers have been notified and trained about the error.	
3.	SI/2013/47 Energy Retailer	EWOV identified via case handling, instances of bulk hot water billing issues at a large apartment complex (approximately 200 apartments), which includes community housing. It appears that there are issues with inconsistent, frequently reissued, cancelled and delayed billing.	The energy retailer confirmed that the apartment complex encountered issues with meter read data due to billing system migration issues. This resulted in issues with estimated usage data not accurately reflecting historical consumption at the property. A fix has been devised that will ensure the data has been aligned correctly, which will result in either actual or more accurate estimated billing in the future.	199
4.	SI/2013/43 Energy Distributor	EWOV identified via its case handling, instances of customers complaining about difficulties with claims being approved following a supply incident on 27 January 2013. It appears that a pole fire may have resulted in a loss of supply for up to	The energy distributor confirmed that a high voltage incident occurred in its distribution area on 27 January 2013 that resulted in a loss of supply to 2,368 customers. The outage lasted approximately 16 hours, although the restoration timeframe	2,368

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		48 hours for a group of customers. Impacted customers advised they were not notified of accurate restoration timeframes and, as a result, were unable to manage loss of supplies appropriately.	differed as properties needed to be inspected by electrical inspectors before power could be restored. The energy distributor confirmed that the incident resulted in 53 loss/damage claims, which were handled on a case-by-case basis.	
5.	SI/2013/56 Energy Retailer	EWOV identified via its case handling, an instance where an energy retailer failed to action a cooling-off request. This resulted in the customer receiving a first bill from the energy retailer and in turn their preferred retailer's transfer request was objected to because of debt owing. The energy retailer alluded to other customers being impacted.	The energy retailer confirmed it was a minor issue between it and another energy retailer that resulted in three customers experiencing delays in changing to their preferred retailer. It has since revised the process with the other energy retailer to ensure that other customers are not impacted and retrospective transfers occur without delay.	3
6.	SI/2013/54 Energy Retailer	EWOV identified via its case handling, instances of customer complaints relating to a sustained outage that occurred during the evening of 8 July 2013 throughout specific suburbs. Customers were concerned regarding the loss and	The energy distributor confirmed that two faults occurred on high voltage power lines resulting in a large-scale outage lasting up to five hours for some suburbs. It acknowledged some miscommunication regarding	Approximately 30,100

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		damage that resulted from the incident and the inaccurate times the distributor provided for supply restoration.	restoration timeframes was given because two faults occurred. It stated that a failure of this nature had not occurred for in excess of 25 years. The energy distributor has since conducted a thermal patrol of the high voltage power line to identify any other potentially troublesome areas. It will also assess damage or loss claims on a case-by-case basis and will notify EWOV should any complications arise from an increased load of claims.	
7.	SI/2013/15 Energy Retailer	EWOV identified via its case handling, instances of an energy retailer billing customers on an incorrect tariff following its billing system upgrade. It appeared to result from a conflict between the network tariff and the retail tariff recorded in its system.	The energy retailer confirmed that it identified and resolved this issue promptly, which prevented it impacting a larger customer base. The issue occurred following a billing system upgrade and a system fix has since been implemented in addition to a dedicated analyst regularly checking for any potential further issues of this nature. All impacted customers were notified of the issue via a letter and refunded any overcharged amount .	Unknown

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			The energy retailer confirmed that it will not seek to recover any undercharged amounts.	
8.	SI/2013/34 Energy Retailer	EWOV identified via its case handling, instances of an energy retailer issuing reminder and disconnection warning notices to customers who were yet to receive the original bill as a result of billing delays.	The energy retailer confirmed that a batch of bills was generated and sent to its printer, although it never actually printed or posted these bills. Subsequently, affected customers received reminder and disconnection notices when the payment was not received. The energy retailer identified impacted customers and issued revised bills that contained all applicable discounts along with a new due date. It also established a dedicated phone line in its contact centre to deal with the influx of calls, along with an automated recording notifying customers of the issue and that action that would be taken. Finally, it established a reconciliation process with its printer to ensure that incidents of this nature do not occur again.	166,681
9.	SI/2013/36	EWOV identified via its case	The energy retailer confirmed that	Unknown

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	Energy Retailer	handling, an instance where a customer received a letter from an energy retailer confirming their payment arrangement was cancelled and if payment in full was not made then debt collection activity would commence.	some of its call centre agents were using the payment arrangement functionality incorrectly in order to place accounts on hold, which is not the correct process to follow. It notified its contact centre of the correct process that should be followed in order to prevent further instances of this nature.	
10.	SI/2013/57 Energy Retailer	EWOV identified via its case handling, an instance where an energy retailer advised that it was unable to successfully provide SFIT customers with their entitled credits due to billing system limitations.	The energy retailer confirmed that due to a billing system issue it was unable to provide SFIT credits for a group of its customers. This was corrected and all impacted customers received billing by the end of September 2013 that included their solar credit entitlements and backbilling that was compliant with the Energy Retail Code. This issue was confined to SFIT customers only.	Approximately 150
11.	SI/2013/30 Energy Retailer	EWOV identified via its case handling, an incident where an energy retailer was encountering system problems applying the	The energy retailer confirmed that there was an issue where it was unable to apply the prompt payment discount to solar accounts	8,419

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		prompt payment discount to solar customer accounts with a credit balance. It appeared that it had to manually apply the prompt payment discount while a system fix was devised.	in credit due to billing system limitations. It confirmed that a system fix was implemented in October 2013 which resulted in the discount being automatically applied. All impacted customers received their discount entitlements (including backdated credits), despite some initial delays.	
12.	SI/2013/66 Energy Retailer	EWOV identified via its case handling, an instance where a solar customer received multiple bills from their energy retailer. One bill included the solar generation, whilst the other bill did not. When the customer contacted the energy retailer it advised that it was the way the billing was structured and that it was unable to issue one bill.	The energy retailer confirmed that it had to issue two bills to solar customers who received concession discounts. One bill included solar credits and the other included the concession discount. The energy retailer advised that this was due to billing system limitations. This issue was resolved in October 2013 with a billing system update and all future billing will be under the one bill.	Unknown
13.	SI/2013/41 Energy Retailer	EWOV identified via its case handling, instances of customers advising they were transferred to an energy retailer without consent following interactions with a	The energy retailer confirmed that it identified five representatives from two telecommunication outlets who participated in alleged fraudulent marketing activity that resulted in	Unknown

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		telecommunications store. EWOV previously investigated this as a systemic issue (SI/2012/87) and the energy retailer advised in October 2012 that it implemented more stringent process controls to prevent misconduct.	the termination of their employment, in addition to the franchisee losing their license. It contacted impacted customers to apologise and return them to their preferred energy retailer. Additionally, the energy retailer retrained the third-party marketing company about its compliance responsibilities. It also provided EWOV with the verification process used in the telecommunication stores that outlines the steps and consumer protections in place.	
14.	SI/2013/68 Energy Distributor	An energy distributor notified EWOV of an issue it experienced with data obtained from a group of Manually Read Interval Meters (MRIM). The mobile meter read devices, used to extract meter data from the MRIMs, collected consumption in watt hours rather than kilowatt hours resulting in under recording of usage.	The energy distributor confirmed that it tested all of its mobile meter read devices to ensure accuracy and decommissioned the faulty units that caused the consumption error. It provided energy retailers with the revised consumption data for impacted customers, in line with the backbilling provision of the Energy Retail Code. Energy retailers will bill impacted customers accordingly	Approximately 3,400

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			with the revised consumption data.	
15.	SI/2013/79 Energy Retailer	EWOV identified via its case handling, an instance where a customer received a letter from an energy retailer confirming that they would be facing a tariff increase because they were being billed according to the incorrect distribution zone in its billing system. The energy retailer advised this error occurred as the customer's property was near a distribution zone boundary.	The energy retailer confirmed that it identified an error where some customer accounts on postcode borders were assigned the incorrect distribution zone in its billing system. The energy retailer advised that it would not recover undercharged amounts and the applicable tariff would apply from the following billing cycle.	17,745
16.	SI/2013/70 Energy Retailer	EWOV identified, via a media report, that an energy retailer acknowledged it was having process issues and was too 'heavy-handed' with some of its credit collection activity. It was alleged that the energy retailer made phone calls that threatened disconnection, additional legal costs, credit default and the inability to access credit in the future.	The energy retailer confirmed that it used two different stages of automated phone messages for payment reminder purposes. The first message was a reminder about the arrears and did not contain consequences for non-payment. The second message was issued at a later time if the arrears remained unpaid and the customer was unable to be reached after multiple phone call attempts. The energy	Unknown

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			retailer identified an issue that was causing the second message to be sent to customers prior to the first. This issue has since been rectified and there has been no recurrence since.	
17.	SI/2013/4 Energy Retailer	EVOW identified via its case handling, instances of an energy retailer issuing disconnection notices for occupier accounts with potentially incorrect timeframes.	The energy retailer confirmed that an issue occurred with an incorrect pay by date on a small batch of occupier notices that were sent to unknown consumers. It confirmed that the issue has been corrected and all notices now reflected the correct timeframes. Whilst this issue resulted in 15 Wrongful Disconnection Payments for the applicable EWOV cases, the energy retailer was not able to identify other impacted customers given personal details had not been provided by the unknown consumers.	15
18.	SI/2012/125	EWOV identified via its case handling, instances of an energy	The energy retailer confirmed that timeframes printed on	Unknown

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	Energy Retailer	retailer issuing disconnection notices for non-payment that did not include the correct disconnection timeframes.	<p>disconnection notices were incorrect, although it did not actually disconnect the customers earlier than allowed. The disconnection notice template was corrected in early 2013 to reflect the correct disconnection timeframes.</p> <p>Given the potential amount of Wrongful Disconnection Payments that could have resulted from this incident, the issue was referred to the Essential Services Commission (ESC) for consideration and action.</p>	
19.	SI/2013/20 Energy Retailer	An energy retailer notified EWOV of an issue with a group of its solar customers. Prior to the closure of the Premium Feed-in Tariff (PFIT), the energy retailer advertised that customers could receive expedited access to PFIT by choosing it as their retailer. The energy retailer arranged installation of its own solar metering without involvement from energy distributors. This created issues at a later stage, when	The energy retailer resolved the complaints on a case-by-case basis depending on the customer's needs and circumstances. Some cases were resolved by offering PFIT top-up credits for the life of the scheme, in addition to backdated PFIT credits. Other cases were resolved by offering out-of-pocket lump sum credits along with backdated PFIT credits.	Unknown

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		customers lost PFIT as the correct process had not been followed.		
20.	SI/2013/98 Energy Retailer	EWOV identified an instance where a customer began receiving bills at incorrect frequencies (i.e. up to fortnightly) following the installation of a Smart Meter at their property. It appeared also that some billing periods overlapped.	<p>The energy retailer confirmed that this was a known issue that occurs when it does not receive notification that a Smart Meter conversion has occurred. It advised it has to manually convert customers to a new billing cycle when it receives this notification, although instances have occurred where it started receiving the Smart Meter billing data prior to the notification which caused billing to be issued at inconsistent frequencies (although no overlap occurred).</p> <p>The energy retailer has now implemented a new manual check process to ensure that bills issued with a low number of days are monitored and checked against the customer's meter type to prevent future incidents occurring.</p>	Unknown
21.	SI/2013/85	EWOV identified multiple instances of Wrongful Disconnection	The energy retailer confirmed that it was not one particular issue that led	Unknown

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	Energy Retailer	Payments being payable due to an energy retailer issuing disconnection notices to incorrect addresses. It appears that in some of these instances that the energy retailer's billing system is sending the notices to other existing customer addresses.	to the incident, but multiple problems that included issues with its billing system, the return to sender process and also the vacant property disconnection process. The energy retailer confirmed that it has implemented system and process changes, including adjusting its disconnection checklist, to ensure that issues with potential incorrect addresses are identified and corrected.	
22.	SI/2013/84 Energy Retailer	EWOV identified an instance where a customer received duplicated billing charges on their recent bill from an energy retailer. When EWOV spoke to the energy retailer about the issue it acknowledged there was a known billing system issue that impacted a group of customers.	The energy retailer confirmed that billing system issues resulted in a group of its customers receiving duplicate billing charges. All impacted customers have been notified and had the refunds and adjustments applied to their accounts. A permanent billing system fix was implemented in March 2014 and accounts were manually monitored up until then.	Approximately 500
23.	SI/2013/101	An energy retailer notified EWOV that it had encountered an issue	The energy retailer confirmed that a system fix was implemented in	Approximately 500

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	Energy Retailer	with group of customers where billing data was generated but could not be printed and sent, resulting in delayed billing.	March 2014 to resume billing and correct this issue. In the interim, it notified impacted customers of the delay and has suspended accounts from the collection process. It has also offered the customers payment plans and will issue billing compliant with the backbilling provisions of the Energy Retail Code.	
24.	SI/2014/1 Energy Retailer	EWOV identified via its case handling, an instance where a customer was experiencing a billing delay and when they called the energy retailer's contact centre they were informed it was as a result of system testing, which meant billing could be delayed for up to two months.	The energy retailer confirmed that it is making some changes in its billing system for customers who are billed for controlled loads. As a result, these customers will encounter billing delays between 30 and 60 days. The energy retailer has notified impacted customers and will offer extended payment terms when the delayed bills are issued.	Approximately 2,200
25.	SI/2013/64 Energy Retailer	EWOV identified via case handling, customer complaints regarding an energy retailer charging additional retail charges. In addition to service to property charges, customers were dissatisfied that there were	The energy retailer confirmed that in late July 2013 it applied these retail charges to approximately 6,500 of its customers, as a once-off charge. Whilst the charge was allowed for its market contract	1,952

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		being billed an 'Increased Carbon & Government Schemes Charge' and 'Regulatory and Network Systems Charge'.	customers, it should not have been billed to its 1,952 standing offer customers (a mix of both electricity and gas customers). Accordingly, the impacted customers had these retail charges refunded on their next billing cycle, with the latest occurring in November 2013. The total of refunds applied to customer accounts amounted to \$54,840.	
26.	SI/2013/78 Energy Retailer	EWOV identified via its case handling, instances of misleading door-to-door marketing where representatives from an energy retailer attempted to transfer customers from a specific energy retailer on the basis that they would not be changing companies. This caused a high level of customer confusion and other billing issues (i.e. direct debit arrangement issues, termination fees and dual fuel complications).	The energy retailer confirmed that it has ceased door-to-door marketing. It resolved the individual complaints EWOV identified, primarily by arranging retrospective transfers to the customer's preferred energy retailer. Whilst it continues with telemarketing, issues of this nature are now infrequent, as door-to-door marketing was the primary complaint driver for this type of issue.	Unknown

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27.	SI/2014/3 Energy Retailer	EWOV identified via its case handling, instances of disconnections occurring as a result of disconnection service orders for non-payment being raised against duplicate accounts under the customer's name. Wrongful Disconnection Payments were applicable in the instances identified.	The energy retailer confirmed that the incidents identified resulted from human error. It confirmed that it has added a step to its checklist for the de-energisation/re-energisation process to ensure this does not occur again. Additionally, it has raised a request for a billing system change that would automatically flag this potential issue if it was to occur again.	Unknown
28.	SI/2013/5 Energy Retailer	EWOV identified via case handling, instances of an energy retailer issuing disconnection notices for non-payment that included incorrect early disconnection timeframes. There were multiple examples that indicated this was not an isolated issue.	<p>The energy retailer confirmed that a billing system issue impacted a small number of customers, although none of the customers were disconnected early. Regardless, Wrongful Disconnection Payments were applicable in these instances and were paid to eligible customers.</p> <p>The energy retailer confirmed that it implemented a billing system fix that meant all disconnection notices included the correct disconnection timeframes. The energy retailer also provided EWOV with copies of the</p>	13

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			amended disconnection notice template.	
29.	SI/2014/18 Energy Distributor	EWOV identified via case handling, an instance where a customer advised of off-supply problems resulting from issues with a transformer in their area. It appears that this fault could be causing supply and reliability issues to other residents in the area.	The energy distributor advised of increased demand in the impacted customers' area resulting in the transformer overloading and blowing a fuse. The heatwave period in early 2014 put extreme demand on the transformer and whenever a fuse blew it had the potential to impact up to 200 customers. The energy distributor confirmed that it found an alternate transformer supply for the customers in question and it prioritised the upgrade of the transformer, which occurred in November 2014.	Approximately 200
30.	SI/2014/17 Energy Retailer	EWOV identified via its case handling, instances of an energy retailer issuing disconnection warning notices requesting payment for an amount that would be insufficient to prevent	The energy retailer confirmed that it has amended the disconnection warning notice to reflect the correct amount of arrears that is required to be paid in order to prevent disconnection. EWOV viewed a copy	Unknown

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		disconnection. The impacted customers paid the amount requested although were subsequently disconnected.	of the new disconnection notice structure to verify this.	
31.	SI/2013/99 Energy Distributor	EWOV identified an instance where an energy distributor acknowledged that there was a defect with some meter exchanges where Time-of-Day pricing had been incorrectly allocated.	The energy distributor confirmed that a group of meters were incorrectly configured following the Smart Meter exchange, which meant it was billing two streams of peak data, rather than the correct peak and off-peak split. It was able to implement a system fix that corrected the issue without any manual contact with the meters involved. It provided revised meter data to retailers so that customers could be rebilled with the correct peak and off-peak split.	1,237
32.	SI/2014/22 Energy Retailer	EWOV identified via case handling, an instance where a customer advised that they had been charged incorrect service to property charges on consecutive billing. The customer advised that the energy retailer acknowledged this was a broader	The energy retailer confirmed that an issue occurred during system migration that meant a group of customers incurred an additional 10% premium service to property charge on their billing, despite them not being signed up to the premium	230

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		issue impacting multiple customers.	service to property product. The energy retailer confirmed that it has identified all impacted customers, refunded the charges, notified them of the issue and had implemented a permanent system fix.	
33.	SI/2013/61 Energy Retailer	EWOV identified via its case handling, an instance where an energy retailer confirmed that a Smart Meter customer was receiving weekly billing. There appeared to be a system fault causing some Smart Meter customers to receive billing at incorrect frequencies.	The energy retailer confirmed that an issue with a distributor providing catch-up meter reads outside the three-month billing periods resulted in its billing system issuing bills for abnormal periods (i.e. weekly) for a group of its customers. The energy retailer advised that this was a once-off occurrence and impacted customers were correctly billed, just not at the correct frequency.	Approximately 200
34.	SI/2014/9 Energy Retailer	EWOV identified via its case handling, various issues arising from a marketing promotion that an energy retailer was offering, where customers received a prepaid \$50 Visa card when entering a market contract.	The energy retailer confirmed the prepaid \$50.00 Visa card applied to both door-to-door and telemarketing contracts and that there had been some confusion for customers regarding the activation process as the balance was not loaded onto the card until the	Unknown

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			<p>transfer was finalised.</p> <p>EWOV provided feedback regarding the complaint types received, including potential misleading door-to-door marketing cases about the amount registered on the card, the activation process and delays in issuing the card to customers. The energy retailer confirmed that it had taken EWOV's feedback into consideration and would review the marketing offer.</p>	
35.	SI/2014/26 Energy Retailer	EWOV identified via case handling, instances of customer complaints where an energy retailer was only willing to accept payment arrangements on the basis of direct debit being established. If direct debit was not implemented then it advised that the arrears would be required to be paid in full.	<p>The energy retailer confirmed that if a customer failed two consecutive payment plans then staff were encouraged to offer a third payment plan via direct debit, although this was not a mandatory requirement. In the example EWOV identified, it was the conduct of an individual representative that lead to the complaint.</p> <p>The energy retailer confirmed that it has coached the individual</p>	Unknown

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			representative and reminded staff that it is not mandatory for the third payment plan to be established via direct debit.	
36.	SI/2014/25 Energy Retailer	EWOV identified via its case handling, an instance where a customer had been offered an additional 10 cents per kWh by an energy retailer when commencing a solar agreement. When billing was received, the customer did not receive this entitlement and the advertising may have generated some confusion.	<p>Whilst the energy retailer's solar terms and conditions clarified the offer available, the website advertisement appeared to have caused some customer confusion. It stated that the government subsidised solar anywhere from zero to eight cents per kWh.</p> <p>This is incorrect as the government subsidises the PFIT and Transitional Feed-in Tariff which range from 25 cents to 60 cents per kWh. The energy retailer changed the wording of the solar offer on its website which provided a much clearer description of the offer available.</p>	Unknown
37.	SI/2013/63 Energy Retailer	EWOV identified via its case handling, an instance where an energy retailer confirmed that it believed the backbilling provisions	EWOV maintains that backbilling provisions under the Energy Retail Code should apply to bulk hot water, given that the energy retailer	Unknown

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		of the Energy Retail Code did not apply to its bulk hot water accounts. This resulted in a customer receiving billing covering an extensive period.	does not have a water license and the billing is for the heating of hot water, not the supply of it. EWOV raised this issue with the ESC and both the ESC and the energy retailer sought legal clarification of this issue. The issue was referred to the ESC for consideration and action, although an outcome has not yet been reached.	
38.	SI/2014/27 Energy Retailer	EWOV identified via its case handling, instances where customers were encountering a billing delay as a result of an energy retailer not being able to accurately apply concession entitlements to billing.	The energy retailer confirmed that there was an issue with the calculation method of the Controlled Load Concession and the Off-Peak Concession for a significant group of its customers. For both groups of impacted customers, a meter exchange had occurred during the billing period and in the majority of cases the concessions applied were less than what the customer should have received. The energy retailer confirmed that it put a hold on all impacted customer accounts once the issue was	1,332

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			identified. It corrected the cause of the issue and issued amended customer billing to reflect the correct concession entitlement.	
39.	SI/2014/35 Energy Distributor	EWOV identified via its case handling, instances where customers had been receiving a dedicated load tariff for many years, only to have lost it and were changed to a peak-only tariff without explanation.	<p>The energy distributor maintained that the issues with tariffs primarily resulted from energy retailers' lack of understanding and customer communication. Although the energy distributor did advise that changes in staff in its new connections area can sometimes result in isolated errors being made.</p> <p>Despite the energy distributor's advice, the EWOV cases identified reflect that it did contribute to the tariff-related issues that customers encountered. The energy distributor confirmed that it will reiterate the correct process with its new connections area to prevent any further potential issues.</p>	Unknown
40.	SI/2014/14	EWOV identified via case handling, an instance where a customer was	The energy distributor confirmed that an issue was caused by a meter	Approximately 1,500

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	Energy Distributor	impacted by delays with an energy distributor providing solar meter data to an energy retailer.	program supplied by the meter manufacturer which impacted meter data being retrieved and processed. This issue only impacted solar customers with manually read interval meters. The energy distributor confirmed that the issue with the meter program has now been corrected and that the metering data has now been provided to the energy retailers, in order to bill in line with the Energy Retail Code.	
41.	SI/2014/5 Energy Retailer	EWOV identified instances of an energy retailer issuing disconnection notices where the disconnection date was earlier than what is allowed under 13.1(c) of the Energy Retail Code. This resulted in Wrongful Disconnection Payments in the cases identified.	The energy retailer confirmed that it is working through this issue with the ESC in order to determine the best course of action for redress. EWOV advised that this should include the notices being amended and any impacted customers assessed for the applicability of a Wrongful Disconnection Payment. The issue was referred to the ESC for consideration and action although an outcome has not yet been reached.	Unknown

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42.	SI/2013/105 Energy Retailer	EWOV identified instances of billing by an energy retailer where the index meter reads on bills did not reconcile against the consumption data provided to EWOV or customers' actual meter reads taken.	The energy retailer confirmed that whilst this was an issue with its existing billing system, it believed it was also contributed to by missing data from an energy distributor. The energy retailer confirmed that the issue with the distributor was resolved in late 2013 and the issue with its billing system was corrected in June 2014.	Unknown

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