

QUARTERLY EWOV

SOLAR AND SMART METER REPORT

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CASE REGISTRATION SNAPSHOT - SMART METER CASES

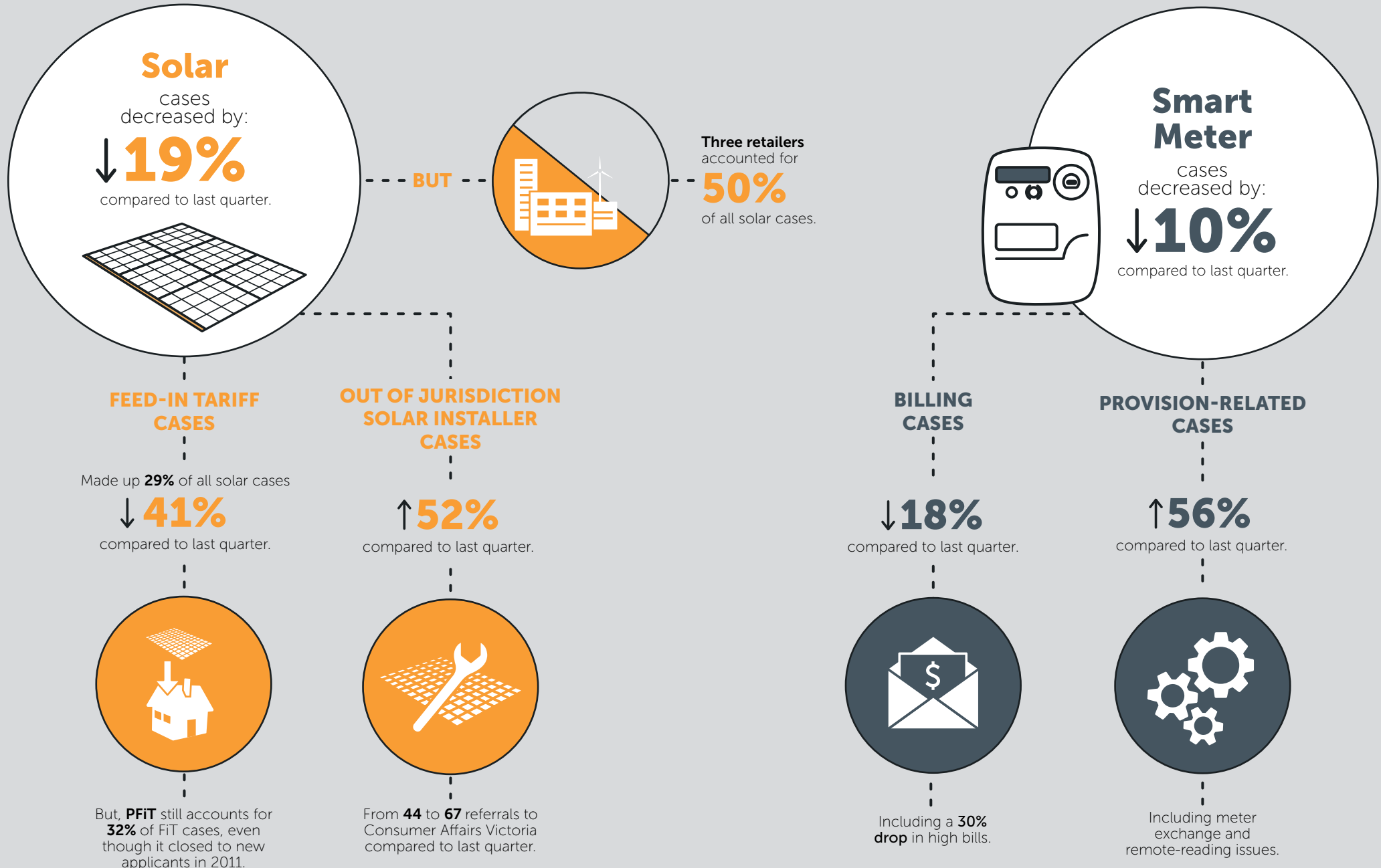
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CASE REGISTRATION SNAPSHOT - SOLAR CASES

Note:

This report provides stakeholders with an analysis of the Energy and Water Ombudsman (Victoria) (EWOV)'s solar and Advanced Meter (Smart Meter) case data, including case issues, case studies, outcomes, and systemic issues.

Case Snapshot - October 2015 to December 2015



SOLAR AND SMART METER CASES

Figure 1 illustrates the number of solar and Smart Meter cases EWOV received for the period of 1 October 2014 to 31 December 2015.

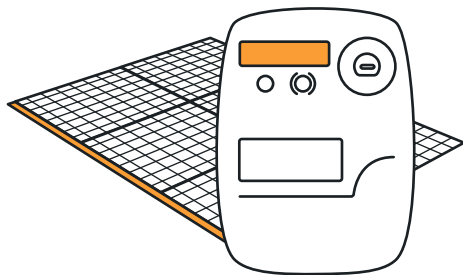
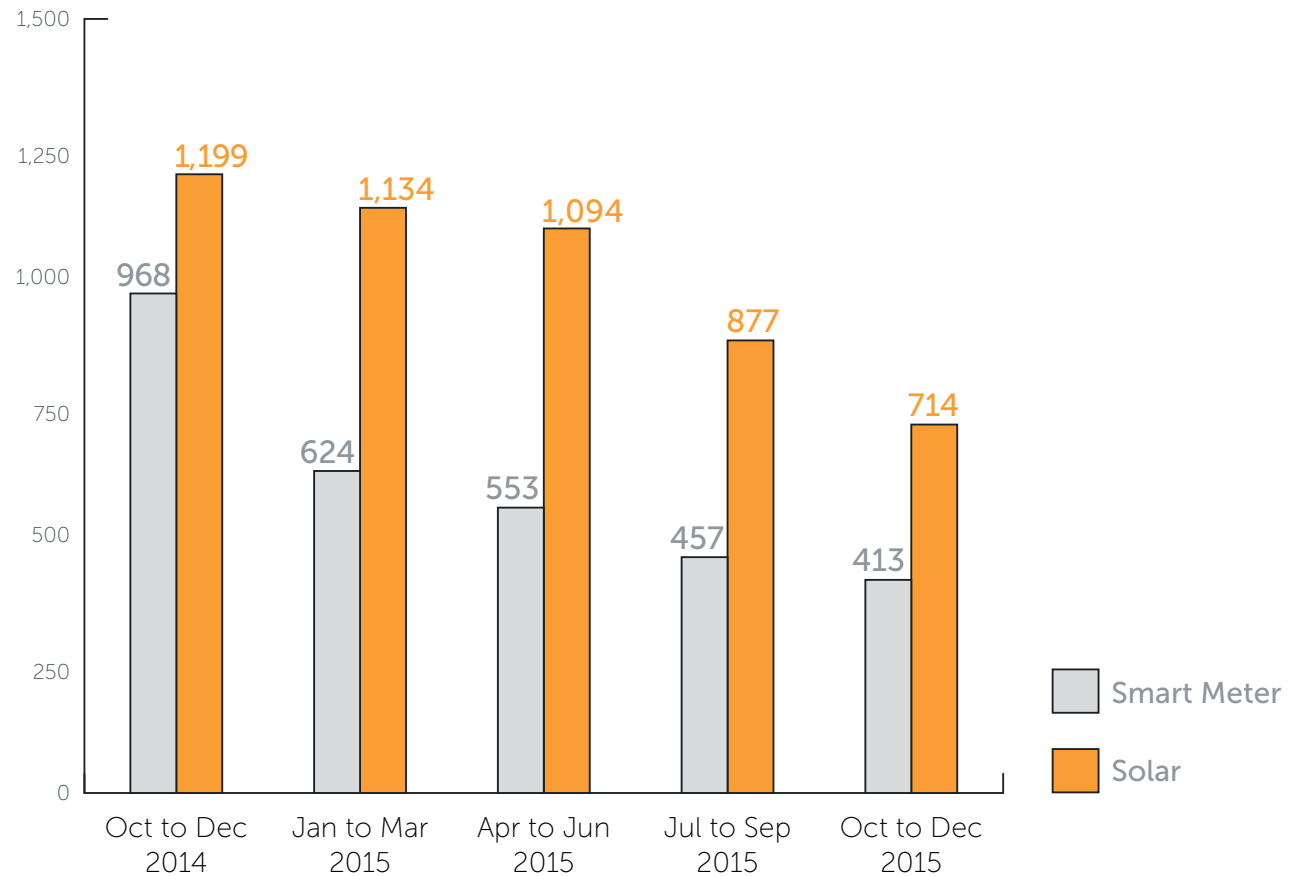


FIGURE 1.

Solar and Smart Meter cases, October–December 2014 quarter to October–December 2015 quarter

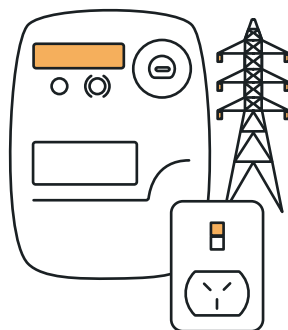


SMART METER UPDATE

EWOV Smart Meter Cases Decrease 10%

- During the reporting period, EWOV recorded a 10% decrease in Smart Meter cases compared to the previous quarter (1 July 2015 to 30 September 2015), with a total of 413 cases registered.
- Compared with the same period in 2014, Smart Meter cases are down 57% from 968 cases. The 57% reduction in Smart Meter cases between 1 October 2014 and 31 December 2015 is significantly greater than the 28% fall in overall EWOV cases over the same period. As noted in previous editions of this report, EWOV expected to see a decline in the number of Smart Meter-related cases as the rollout is effectively complete¹ and Smart Meters are becoming the accepted 'norm' in Victoria.

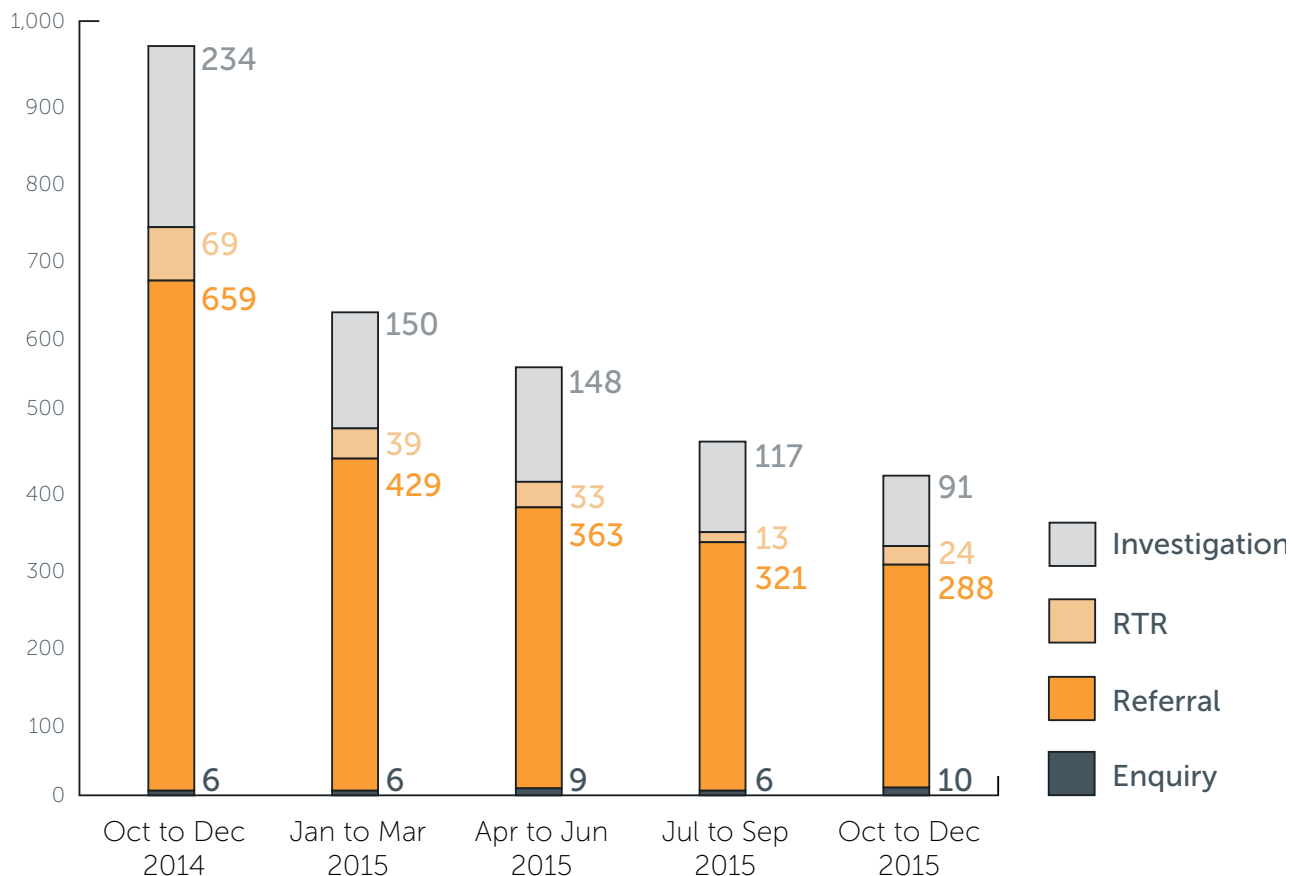
Figure 2 shows the Smart Meter cases received between 1 October 2014 to 31 December 2015.



1 Victorian Government Smart Meter website: <http://www.smartmeters.vic.gov.au/about-smart-meters/end-of-rollout>.

FIGURE 2.

Smart Meter cases by case level, October–December 2014 quarter to October–December 2015 quarter



Descriptions of case levels: Enquiry, Referral, Real Time Resolution (RTR) and Investigation are available in the Glossary on page 15.

Smart Meter Issues and Case Trends

Table 1 shows the top 10 Smart Meter issues registered between 1 October 2015 and 31 December 2015 compared to the prior quarter and the same period in 2014. Billing-related Smart Meter cases decreased from 69% of total cases last quarter to 62% of total cases this quarter. This decrease was largely driven by a 30% decrease in high bills, 38% reduction in loss of off-peak tariffs and a 37% decrease in backbilling cases across Smart Meter cases. Interestingly, the proportion of Provision cases increased from 10% (45 cases) of Smart Meter cases last quarter to 17% (70 cases) of all cases this quarter. The biggest increases in Provision cases were for meter exchanges, concerns about the safety of Smart Meters, and supply upgrade issues.

Encouragingly, all case issues continue to be down significantly compared to the same period in 2014, with the exception of Provision > Existing Connection > Other. Analysis of these cases showed that customers commonly complained about:

- Issues with remote reading capabilities.
- Their new Smart Meter not being listed in the Market Settlement and Transfer Solution (MSATS) correctly.
- Being unable to read their Smart Meter.
- Defects and damage to property during Smart Meter installations.
- Not receiving a Smart Meter with the same specifications or capabilities as their previous meter.

TABLE 1.

The top 10 Smart Meter issues, October–December 2014 quarter, July–September 2015 quarter, October–December 2015 quarter

ISSUE	NUMBER OF ISSUES PER QUARTER			% CHANGE	
	OCT–DEC 2014	JUL–SEPT 2015	OCT–DEC 2015	Year-on-Year	Quarter-on-Quarter
	Billing > High > General	229	125	88	DOWN 45%
Billing > Estimation > High	78	24	26	DOWN 67%	UP 8%
Credit > Disconnection / Restriction > Arrears > Imminent	79	28	25	DOWN 68%	DOWN 11%
Billing > Tariff > Loss of Off Peak Rates	76	32	20	DOWN 74%	DOWN 38%
Credit > Disconnection / Restriction > Arrears > Actual	22	23	20	DOWN 9%	DOWN 13%
Billing > Backbill > Other	50	30	19	DOWN 62%	DOWN 37%
Provision > Existing Connection > Other	6	3	16	UP 167%	UP 433%
Billing > Meter > Reading	16	11	12	DOWN 25%	UP 9%
Provision > Existing Connection > Meter Exchange	34	7	11	DOWN 68%	UP 57%
Billing > Estimation > Meter Access	25	6	10	DOWN 60%	UP 67%

Smart Meter Rebates

As reported in the last two reports, a new issue was added to EWOV's issue categories in response to the Victorian Government-mandated Smart Meter rebates²: Provision > Existing Connection > Smart Meter Rebate. In the current reporting period, EWOV received three cases about it. Since EWOV started capturing this issue, we have registered a total of 26 cases about Smart Meter rebates. As the rebate period ended on 31 December 2015, EWOV will no longer report on this issue in future editions of this report.

Of the 413 Smart Meter cases:

- 344 cases were recorded against electricity retailers (83%) – down six percentage points compared to last quarter.
- An additional 63 cases (15%) were registered against distributors³, up five percentage points from the previous quarter.
- The majority of cases (70%) were handled as Referrals⁴, the same result as last quarter.
- 22% required an Investigation⁵, down four percentage points compared to the previous quarter.

- Retailer 12 was the electricity retailer with the highest number of Smart Meter cases for the seventh consecutive quarter, with 19% of all cases received (78 cases). However, this was down from 88 cases last quarter.
- As seen last quarter, most of Retailer 12's cases were in Distributor 4's distribution area (35 cases, down 29% from 49 cases last quarter) and its top two issues were Billing > High > General (23 cases) and backbills which recorded 11 cases.
- Retailer 9 again received the second highest number of retail cases and registered 19% of total Smart Meter cases (77 cases, down from 86 cases last quarter) – most of these (51 cases) were in the Distributor 3 area. Retailer 9's top two issues were high bills (21 cases) and estimated bills (10 cases).
- Distributor 3 continued to be the distributor with the most cases, accounting for 6% of all cases received (26 cases), up one percentage point on last quarter. Customers mainly complained about issues with their existing connection, including meter exchange, safety and remote-reading capabilities.

For more Smart Meter case data, Table 3 on [page 17](#) shows the cases received by company and distribution area.

² Victorian Government Smart Meter website: <http://www.smartmeters.vic.gov.au/about-smart-meters/end-of-rollout>.

³ Note: Five Smart Meter cases were not allocated against an EWOV Scheme Participant.

⁴ 59% were handled as Assisted Referrals and 11% as Unassisted Referrals. Descriptions of Assisted Referrals and Unassisted Referrals are contained in the glossary on [page 15](#).

⁵ A further 6% were handled via the Real Time Resolution process. Descriptions are available in the glossary on [page 15](#).



Case Study

Case reference: 2015/31811 | Outcome: Conciliation

Mr C's Smart Meter exchange causes a high estimated bill

The Issue

Mr C had his meter exchanged for a Smart Meter on 20 July 2015. His billing with Retailer 12 had been correct and based on actual reads prior to the installation of the Smart Meter. However, on 18 August 2015, Mr C received a high bill from Retailer 12 for about \$1,000.00 which included an estimated meter read for the old meter that was removed. Mr C was also concerned that the high bill did not include all of the discounts offered to him. He contacted Retailer 12 about the high bill and was advised that it would investigate the high bill and re-contact him. After Mr C was not re-contacted, he made additional efforts to resolve the issue directly and was advised each time that it would investigate and re-contact him. However, Mr C was not re-contacted. After several months trying to resolve the issue, Mr C contacted EWOV on 10 November 2015 and an Assisted Referral was raised. However, the Assisted Referral did not resolve the customer's concerns so the case escalated to a Real Time Resolution with an agreement that Mr C would be contacted by 1 December 2015 with information about the final read from the old meter and details about account re-billing. However, this did not occur so Mr C re-contacted EWOV on 2 December 2015 and the complaint was moved to an Investigation.

The Investigation

EWOV's investigation included checking Mr C's metering information in the national electricity database, conducting an account reconciliation of Mr C's account and the property's meter read history. We also reviewed the contact notes on the account and confirmed the actual meter read taken by Distributor 1 when Mr C's old meter was replaced with a new Smart Meter. Distributor 1 provided Retailer 12 with the actual meter read from the old meter so that Retailer 12 could adjust Mr C's billing accordingly. Additionally, we requested Retailer 12 to provide a copy of Mr C's contract to verify the discounts that he was entitled to. We also reviewed the bills issued to ensure that the discounts had been applied correctly.

The Outcome

Retailer 12 confirmed that it had re-billed the account with the actual meter read taken by Distributor 1 when it replaced Mr C's old meter with a new Smart Meter on 20 July 2015. Retailer 12 re-billed the account and confirmed the revised balance was \$218.56. Retailer 12 confirmed that all of the eligible discounts had been applied to Mr C's account according to the terms and conditions of his contract. Retailer 12 advised that if Mr C made payment to the account by 13 January 2016, the balance was only be \$142.66 due to the prompt payment discount. Mr C was satisfied and the case was closed.

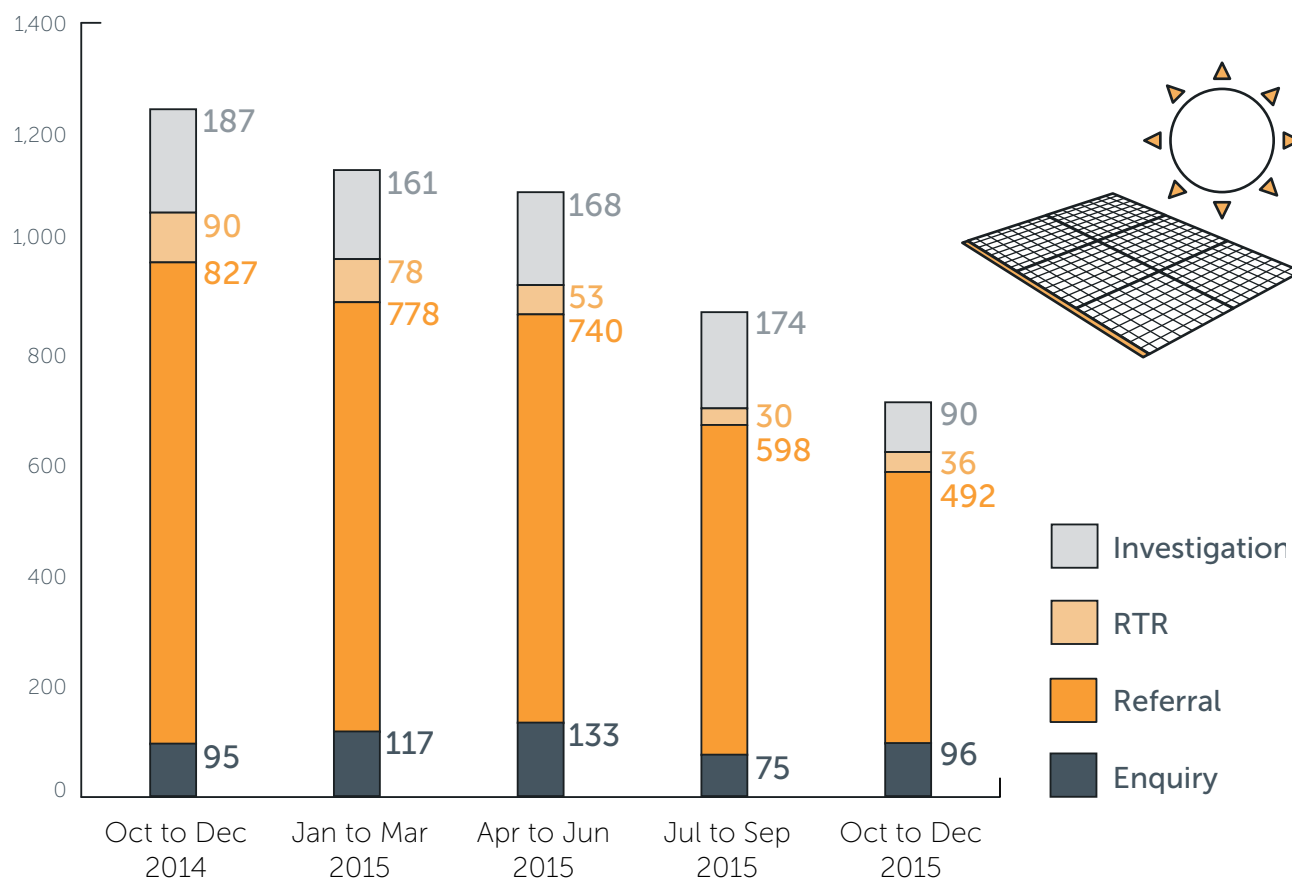
SOLAR UPDATE

EWOV Solar Cases Down 19%

- Between 1 January 2001 and 31 December 2015, 275,561 small-scale solar PV systems were installed in Victoria, up from 268,148⁶ (up 3% or 7,413 systems) reported in the last edition of this report⁷.
- Solar systems are now on an estimated 13.8%⁸ of the total dwellings in Victoria, up from 13.1% in the last edition of this report.
- EWOV solar cases fell 19% in the October to December 2015 quarter – when compared to the previous quarter – with a total of 714 cases received.
- When compared to the same quarter in 2014, solar cases received between 1 October and 31 December 2015 were down 40% from 1,199 cases.
- The 40% decline in solar cases between 1 October 2014 and 31 December 2015 was higher than the drop in total EWOV cases received in the same period (down 28%). This is likely due to many of the residual feed-in tariff (FiT) issues subsiding following the closure of some FiT schemes.

FIGURE 3.

Solar cases by case level and quarter, October–December 2014 quarter to October–December 2015 quarter



⁶ Data from Clean Energy Regulator: <http://www.cleanenergyregulator.gov.au/RET/Forms-and-resources/Postcode-data-for-small-scale-installations>.

⁷ Page 9, EWOV Quarterly Solar and Smart Meter Report – October 2015: <https://www.ewov.com.au/reports/solar-and-smart-meter-report-oct-2015>.

⁸ Australian PV Institute (APVI) Solar Map, funded by the Australian Renewable Energy Agency, accessed from: <http://pv-map.apvi.org.au/historical#4/-26.67/134.12>.

Descriptions of case levels: Enquiry, Referral, RTR and Investigation are in the Glossary on page 15.

Solar Issues and Case Trends

Table 2 shows the top 10 solar issues recorded during the October to December 2015 quarter and is compared with the previous quarter and the same period in 2014. Even though solar cases decreased compared to last quarter – and saw a significant drop compared to the same time last year – particular issues, including supply upgrade delays, issues with the Premium Feed-in Tariff (PFiT) and backbills received following the installation of solar increased from last quarter. More detail about the solar issues in EWOV cases is on [page 11](#).

TABLE 2.

The top 10 solar issues, October–December 2014 quarter, July–September 2015 quarter, October–December 2015 quarter

ISSUE	NUMBER OF ISSUES PER QUARTER			% CHANGE	
	OCT–DEC 2014	JUL–SEPT 2015	OCT–DEC 2015	Year-on-Year	Quarter-on-Quarter
	Billing > High > General	122	106	90	DOWN 26%
General Enquiry > Energy / Water	89	66	90	UP 1%	UP 36%
Provision > Existing Connection > Supply Upgrade > Delay	140	46	60	DOWN 57%	UP 30%
Billing > Tariff > General Feed In > Not Applied	81	64	42	DOWN 48%	DOWN 34%
Billing > Tariff > Premium Feed In > Not Applied	99	60	39	DOWN 61%	DOWN 35%
Credit > Disconnection / Restriction > Arrears > Imminent	32	26	25	DOWN 22%	DOWN 4%
Billing > Backbill > Other	38	19	22	DOWN 42%	UP 16%
Billing > Tariff > Premium Feed In > Contract	20	15	22	UP 10%	UP 47%
Transfer > Contract Terms > Variation - Price / Terms	27	44	18	DOWN 33%	DOWN 59%
Billing > Backbill > Payment	6	13	17	UP 183%	UP 31%

Of the 714 solar cases:

- the majority were registered against electricity retailers (82%), down six percentage points on the previous quarter
- a further 5% were recorded about electricity distributors, up one percentage point on last quarter
- 91 cases (13%) were not allocated against a scheme participant and of these, 67 cases (9%) were found to be out of jurisdiction as the customer's case was about a private solar installer⁹ – this was a 52% increase compared to the previous quarter
- the majority were handled as Referrals (69%)¹⁰ – one percentage point higher than last quarter
- 13% required an Investigation¹¹ – a decrease of seven percentage points which indicates a fall in the complexity of solar complaints reaching EWOV and/or better internal dispute resolution at the companies
- Retailer 9 received the most solar cases with 122 (17% of all solar cases), down 14% from 142 in the previous quarter – 69 cases were in Distributor 3's distribution area
- Retailer 12 also accounted for 17% of all solar cases, registering 119, but cases were down 49% compared to last quarter – most of these (40%) were in Distributor 5's distribution area

⁹ In these instances, customers were referred to Consumer Affairs Victoria.

¹⁰ 56% handled as Assisted Referrals and a further 13% handled as Unassisted Referrals. Descriptions of Assisted Referrals and Unassisted Referrals are available in the glossary on [page 15](#).

¹¹ A further 5% were handled by Real Time Resolution and 13% were registered as Enquiries.

- Billing issues were the primary concern for 64% of solar customers, down by five percentage points compared to last quarter, with 458 Billing-related cases registered
- Provision issues reversed last quarter's downward trend and increased from 80 cases to 86 cases and accounted for 12% of all solar cases, up three percentage points
- the proportion of Feed-in Tariff (FiT) cases decreased from 40% to 29% of total solar cases (208 cases, down from 353 cases last quarter). This represents a 41% decline in FiT cases from last quarter.

Of the 208 FiT cases received:

- Retailer 12 had the most with 45 cases (22% of all FiT cases – down 20 percentage points from 42% (145 cases) last quarter
- Retailer 3 recorded the second highest number of solar cases with 43 registered (21% of all FiT cases)
- 16% (33) were about the Transitional Feed-in Tariff (TFiT), down 71% from 115 cases last quarter
- 33% (69) related to the General Feed-in Tariff (GFiT), up from 27% (97 cases) last quarter
- 66 were Premium Feed-in Tariff (PFiT) cases, which increased as a proportion of all FiT cases from 23% last quarter (82 cases) to 32% this reporting period
- 9% (18 cases) were about the Standard Feed-in Tariff (SFiT), down five percentage points from 48 cases in the previous quarter¹²

¹² A further 11% of FiT cases were classified as 'no feed-in tariff' as the correct FiT could not be identified by the customer.

- 62% of customers had concerns about not receiving solar credits, the same as last quarter
- 27% of customers were dissatisfied about their solar contracts, down two percentage points from the July to September 2015 quarter
- incorrect generation was associated with 11% of cases, up two percentage points on last quarter¹³
- For more solar case data, Table 4 on [page 18](#) shows the cases received by company and distribution area.

¹³ One case related to the solar FiT being charged not credited.

GFiT in 2016

Victoria's independent regulator of essential services, the Essential Services Commission (ESC) is responsible for setting a 'fair and reasonable' solar feed-in tariff each year¹⁴. In 2013 and 2014, the GFiT was set at 8.2 cents/kWh. In 2015, the GFiT was lowered to 6.2 cents/kWh. EWOV notes, as reported in the July 2015¹⁵ edition of this report, that there was a large increase in solar contract term complaints specifically about GFiT during the January to March 2015 quarter. This spike in cases corresponded with the GFiT being lowered from 8.0 cents/kWh to 6.2 cents/kWh from 1 January 2015¹⁶.

Analysis of these EWOV solar cases showed that many customers said that they did not know the GFiT could be changed during their fixed-term contracts and that the lowering of the GFiT was not clearly communicated to them. EWOV will monitor GFiT cases in the forthcoming January to March 2016 quarter as many retailers reduce the GFiT to 5.0 cents/kWh from 1 January 2016 following the ESC's Final Decision¹⁷ on the level of the 2016 GFiT.

14 ESC website: <http://www.esc.vic.gov.au/Energy/2014-Minimum-Feed-in-Tariff>.

15 EWOV Solar and Smart Meter Report – July 2015: <https://www.ewov.com.au/reports/solar-and-smart-meter-report-jul-2015>.

16 ESC website: <http://www.esc.vic.gov.au/getattachment/0364a70d-f8c7-4fb2-a341-3c3d6694adf6/Final-Decision-Minimum-Feed-in-Tariff-for-2015.pdf>.

17 ESC website: <http://www.esc.vic.gov.au/getattachment/93edcf18-1659-4518-9057-eee1215bf194/Minimum-Electricity-Feed-in-Tariff-to-apply-from-1.pdf>.



Case Study

Case reference: 2015/26942 | Outcome: Conciliation

Mr K installed solar and applied for TFiT, but when he changed retailers his solar credits reduced.

The Issue

Mr K installed solar in early September 2012 and lodged all of the required paperwork to his retailer at the time, Retailer 9, in mid-September 2012. Mr K's meter was configured for solar on 28 November 2012 and he had applied for the Transitional Feed-in Tariff (TFiT) of 25 cents/kWh. He began to receive bills from Retailer 9 with solar credits applied. In December 2013, Mr K transferred his electricity account to Retailer 12. He received bills from Retailer 12, however, after some time he noticed that the bills included the lower General Feed-in Tariff (GFiT) of 8 cents/kWh. He did not believe that he was being credited for the correct FiT and upon contact with Retailer 12 discovered that the network tariff had been configured for the Standard Feed-in Tariff (SFiT). The rules for SFiT state that customers cannot transfer between retailers; otherwise they will lose SFiT and be placed on the lower GFiT. However, customers with TFiT can transfer between retailers and remain on it. Dissatisfied with this information and the apparent error (Retailer 9 applying SFiT instead of TFiT), Mr K contacted Retailer 9 to discuss the issue. However, Mr K was unable to resolve it directly so he contacted EWOV on 21 September 2015 and an Assisted Referral was raised. This process did not resolve Mr K's concerns, so he recontacted EWOV on 30 October 2015 but due to the complexity of the complaint, the matter was handled as an Investigation.

The Investigation

EWOV reviewed the national electricity database, the Market Settlement and Transfer Solution (MSATS), to check when Mr K's meter was made solar capable and the date that the TFiT should have applied from. EWOV requested Mr K's meter data to confirm his solar export to assist with calculating approximately how many kWhs would have been credited at the higher TFiT had the error not occurred. This was for the period when Mr K transferred to Retailer 12 on 15 July 2015 and the end of the TFiT scheme on 31 December 2016.

The Outcome

Retailer 9 apologised for the inconvenience caused and acknowledged its error in applying SFiT instead of TFiT, which was subsequently lost when Mr K transferred to Retailer 12. Retailer 9 provided Mr K with a credit of about \$1,372 to reimburse him for the approximate loss of the higher TFiT until the end of the scheme. Mr K needed to sign a release document to acknowledge the credit as full and final settlement of the matter. Mr K was satisfied with the outcome and the case was closed.

CONTEXT

Readers of this report should take into account the following:

Reporting is by primary issue

Each case EWOV receives is categorised with a primary issue which falls into one of nine issue categories: billing, credit, customer service, general enquiry, land, marketing, provision, supply and transfer. Descriptions of the issue categories are on [page 16](#). If the customer's statement indicates that the case is about more than one issue, EWOV may register a second (or even third) issue for the one case. For example, a case may be registered as both high bill and meter exchange.

Figures in this report refer to primary issue only. In other words, the data in the report only reflects the main issue in the solar or Smart Meters case, even if second and third issues were registered.

EWOV's analysis is limited by its scope

EWOV only examines the cases it receives, limiting our ability to analyse trends and their causes. For example, we may not always know how many solar customers a company may service; nor do we know how effective each company's internal complaint procedures are.

Most cases are Referred Complaints

This report is based on data taken from enquiries and complaints. Complaints are categorised as either Unassisted Referrals, Assisted Referrals, Real Time Resolutions or Investigations (see the Glossary on [page 15](#)). EWOV does not investigate Referred Complaints and is limited to hearing only the customer's account of the issue.

Customers sometimes re-contact EWOV

Customers sometimes re-contact EWOV because after a referral back to their company, their concerns remain unresolved. This can mean that EWOV registers an Assisted Referral after a previous Unassisted Referral, or a Real Time Resolution after a failed Assisted Referral, and so on.

Customers sometimes lodge more than one case

Based on the customer's statement, EWOV sometimes registers two or more cases for one customer – for example, one case about a billing delay and one case about the variation of contract terms/price. Also, a customer may have issues with two different companies at the same time.

Case data is subject to adjustment

EWOV sometimes reports the same measures in different publications. Data for these reports may be compiled on different dates, which can mean that some cases have been re-opened, escalated or re-categorised as more information came to light. This can result in small variations in reported figures across different reports.

Percentages

Due to rounding, some percentages may not total 100%.

GLOSSARY

Complaint

A complaint is an expression of dissatisfaction regarding a policy, practice or customer service performance of an energy or water company which is part of the EWOV scheme, where a response or resolution is explicitly or implicitly expected.

Enquiry

An enquiry is a customer's request for general information (e.g. about the Smart Meter rollout). This information may be provided by EWOV or the customer may be referred to another agency.

Referred Complaint

EWOV does not know the outcome of these referred complaints, except where the referral does not resolve the issue for the customer and they come back to us. There are two types of referred complaints:

Unassisted Referral

Where a customer has not yet spoken with their company about their complaint and they are referred back to the company's contact centre.

Assisted Referral

Where a customer has spoken with someone at their company's contact centre about their complaint, but it remains unresolved and the matter is referred to a higher level complaint resolution officer at the company.

Real Time Resolution

EWOV's Real Time Resolution Team receives failed Assisted Referral calls from customers and then works to negotiate a fair and reasonable resolution of the complaint – all within a one-call approach.

Investigation

A complaint for investigation is registered where:

- an Assisted Referral or Real Time Resolution case has failed, as the matter remains unresolved, and the customer has recontacted EWOV, or
- the matter is complex and unlikely to be resolved as an Assisted Referral or by Real Time Resolution, or
- the energy or water company has requested an escalation to an Investigation.

Not allocated

This case type is registered when a customer tells EWOV about their concern but it does not involve an EWOV Scheme Participant, or the customer does not know or tell us the company's name.

EWOV ISSUE CATEGORIES

Billing

Generating and sending bills and payment processes.

Credit

Unpaid bills and the action taken to collect arrears, including supply disconnection/restriction and debt collection.

Customer Service

Service received or not received.

General Enquiry

A request for information only, where a complaint is outside EWOV's jurisdiction or where the complaint relates to another industry such as telecommunications.

Land

The effect on property of company activities or network assets.

Provision

The connection of a property to the energy or water network.

Marketing

How energy retailers go about winning new customers.

Supply

The physical delivery of the energy or water service.

Transfer

Switching an account to a new energy retailer.

TABLE 3.

Case Registration Snapshot - Smart Meter Cases, October–December 2015 quarter

COMPANY	DISTRIBUTORS						TOTAL	PERCENTAGE
	DISTRIBUTOR 1	DISTRIBUTOR 2	DISTRIBUTOR 3	DISTRIBUTOR 4	DISTRIBUTOR 5	NOT ALLOCATED		
Retailer 2	2		8	8	3		21	5%
Retailer 3	6	7	13	16	20	1	63	15%
Retailer 6			7	1	4		12	3%
Retailer 7		1		1			2	0%
Retailer 8	2		3	6	1		12	3%
Retailer 9	9	3	51	4	10		77	19%
Retailer 10			1	2	1	1	5	1%
Retailer 12	16	1	13	35	12	1	78	19%
Retailer 13		1	11	9	5		26	6%
Retailer 14	1	1	4	10	8		24	6%
Retailer 15			6	9	5	1	21	5%
Retailer 16						1	1	0%
Retailer 17			1	1			2	0%
Distributor 1	3						3	1%
Distributor 2		5					5	1%
Distributor 3			26				26	6%
Distributor 4				20			20	5%
Distributor 5					9		9	2%
Not allocated			2	2		1	5	1%
Exempt Retailers				1			1	0%
Total	39	19	146	125	78	6	413	
Percentage	9%	5%	35%	30%	19%	1%		

TABLE 4.

Case Registration Snapshot - Solar Cases, October–December 2015 quarter

COMPANY	DISTRIBUTORS							TOTAL	PERCENTAGE
	DISTRIBUTOR 1	DISTRIBUTOR 2	DISTRIBUTOR 3	DISTRIBUTOR 4	DISTRIBUTOR 5	NOT ALLOCATED	INTERSTATE		
Retailer 1					2			2	0%
Retailer 2	2		20	8	9			39	5%
Retailer 3	9	2	30	20	49	1		111	16%
Retailer 4					2			2	0%
Retailer 5					1			1	0%
Retailer 6			7	3	4			14	2%
Retailer 7					1			1	0%
Retailer 8	2		7	4	10			23	3%
Retailer 9	3	1	69	24	24	1		122	17%
Retailer 10	2		3	2	1	1		9	1%
Retailer 11			1		1			2	0%
Retailer 12	18	1	21	30	48	1		119	17%
Retailer 13	8	1	16	15	7			47	7%
Retailer 14	6	1	26	10	20			63	9%
Retailer 15	1		10	6	12			29	4%
Retailer 17			1		3			4	1%
Distributor 1	2							2	0%
Distributor 2		2						2	0%
Distributor 3			11					11	2%
Distributor 4				6				6	1%
Distributor 5					12			12	2%
Not allocated		3	17	8	30	32	1	91	13%
Exempt Retailers					2			2	0%
Total	53	11	239	136	238	36	1	714	
Percentage	7%	2%	33%	19%	33%	5%	0%		