



Res ONLINE



ENERGY AND WATER
OMBUDSMAN
Victoria **Listen Assist Resolve**

CONTENTS

3	THE OMBUDSMAN'S VIEW
4	THE BIG PICTURE
5	ISSUES WATCH
9	BILLING
11	CREDIT
15	TRANSFER
17	SOLAR AND SMART METERS
19	ELECTRICITY
20	GAS
21	WATER
22	SYSTEMIC ISSUES
24	PUBLIC SUBMISSIONS MADE BY EWOV
26	GLOSSARY

FIGURES

9	FIGURE 1 Billing cases
11	FIGURE 2 Credit cases
13	FIGURE 3 Credit-related disconnection and restriction cases
14	FIGURE 4 WDP outcomes
15	FIGURE 5 Transfer cases
17	FIGURE 6 Solar and Smart Meter cases
19	FIGURE 7 Electricity cases
20	FIGURE 8 Gas cases
21	FIGURE 9 Water cases

THE OMBUDSMAN'S VIEW

On issues watch – delays in new connections

Over the past year, we've seen quarterly increases in complaints about long, unexplained wait times, incorrect/missing/confusing information, and poor communication around new energy connections. In this issue of *Res Online*, we present [a look at what has been driving these complaints](#). It points to a series of faults and errors, which have frustrated customers enough for them to seek the assistance of EWOV.

We also use three case studies to illustrate some of the underlying, inter-related and, in our view, preventable issues.

In the first case, the customer's builder initiated the complaint because connection delay was costing her time and, potentially, money. Our Investigation revealed inconvenience and extra cost due to unreadable paperwork, a service order raised with the wrong distributor, and wrongful disconnection of supply to the site.

The second case highlighted issues around poor communication, inconvenience and extra cost, when the customer was wrongly told her gas connection was complete, so she laid concrete which then had to be cut up.

In the third case, one of a customer's two connection requests was archived by mistake by the retailer and the customer didn't realise this until he went to sell the property. He incurred costs for a settlement delay and tried to claim more than he should have against the electricity retailer.



Cynthia Gebert
Energy and Water Ombudsman (Victoria)

If you have any feedback about *Res Online*, please contact Matt Helme, EWOV's Research and Communications Manager at: matt.helme@ewov.com.au.

Other case studies in this issue

- [Water customer disputes New Customer Contribution \(NCC\) charges](#)
- [Customer faces debt collection action after billing and payment allocation errors](#)
- [Disconnection after electricity retailer doesn't correct its transfer error](#)

EWOV Roadshow

In October 2016, we embarked on our latest EWOV Roadshow, reaching out to organisations around Victoria that assist vulnerable and disadvantaged people. Our aim is to improve awareness of EWOV's free and independent dispute resolution service, and highlight common energy and water concerns and customer rights and responsibilities. So far, we've travelled out to Ballarat and Wendouree, and into the Melbourne suburbs of Fitzroy, Doncaster, Templestowe, Bulleen, Ringwood, Croydon, Dandenong, Mulgrave, Epping, St Albans, Sunshine, Preston and Lalor. We've visited over 30 organisations, which provide a wide range of local services for families, youth, children, the elderly, migrants and Indigenous communities, as well as local councils and legal centres. We expect this Roadshow to run until June 2017. Next up, we're booked to head to Mildura, Kyabram, Yarra Ranges, Broadmeadows, Box Hill, Hobsons Bay, Ashburton and Camberwell.

A handwritten signature in black ink, appearing to read 'Cynthia Gebert'.

Cynthia Gebert
Energy and Water Ombudsman (Victoria)

THE BIG PICTURE

OCTOBER - DECEMBER 2016

Compared to last quarter:

CASES
▼ 4%

ENQUIRIES
▼ 10%

UNASSISTED REFERRALS
▼ 9%

ASSISTED REFERRALS
▼ 1%

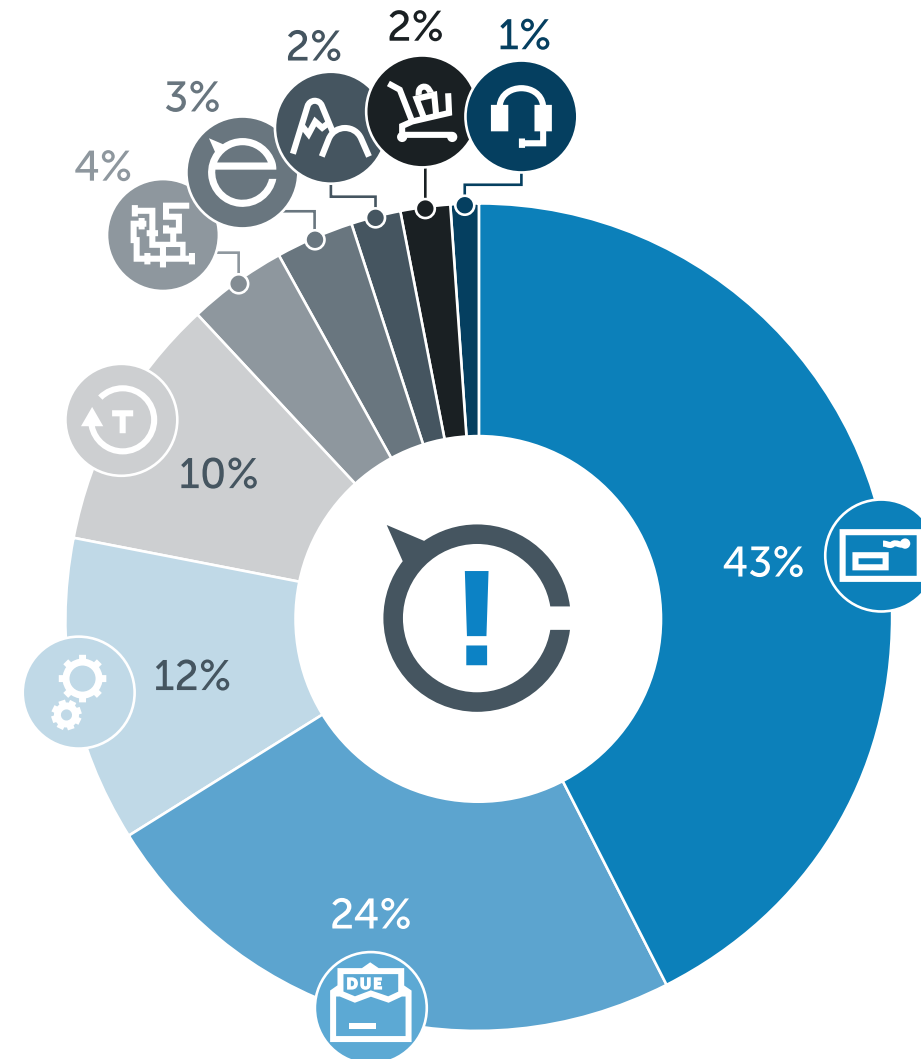
REAL TIME RESOLUTIONS
▼ 28%

INVESTIGATIONS
▼ 2%

8,392 CASES



The issues customers complained about



Compared to last quarter:

BILLING
3,590 cases
▼ 1%

CREDIT
2,031 cases
▼ 12%

PROVISION
987 cases
▲ 15%

TRANSFER
858 cases
▼ 14%

SUPPLY
339 cases
▲ 13%

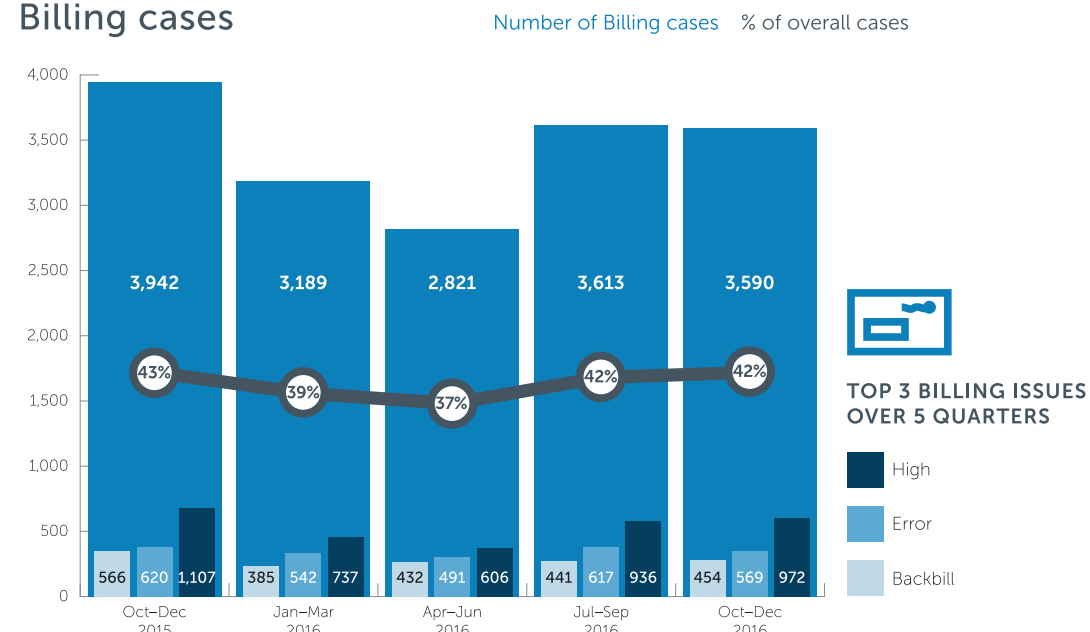
GENERAL ENQUIRY
228 cases
▼ 11%

LAND
144 cases
▲ 5%

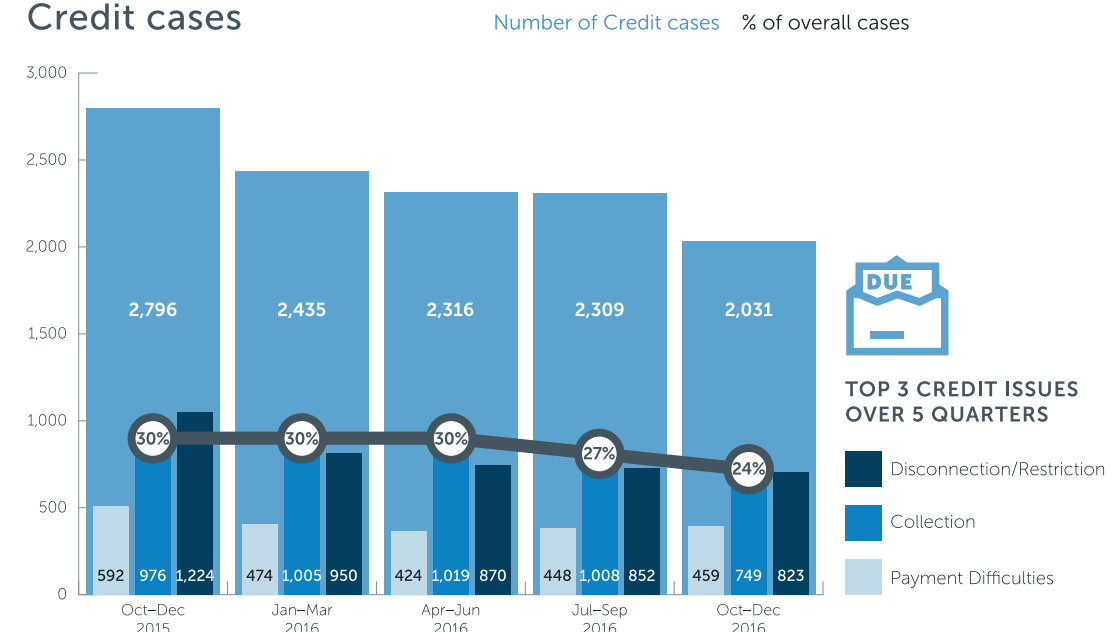
MARKETING
137 cases
▲ 4%

CUSTOMER SERVICE
78 cases
▼ 15%

Billing cases



Credit cases



ISSUES WATCH

New connection delay

Cases up 138%

In the first quarter of 2016 (January to March), EWOV received 125 cases about delay in connecting a new electricity or gas supply. By the last quarter of 2016 (October to December) cases about delays in new energy connections had increased 138% to 297.

Cases received by EWOV about new connection delay	Jan–Mar 2016	Apr–Jun 2016	Jul–Sep 2016	Oct–Dec 2016
Electricity	53	79	58	182
Gas	72	86	122 (1 LPG)	114 (1 LPG)
Totals	125	165	181	297

A mixed bag of common underlying issues

When they contacted EWOV, customers usually complained about long wait times, leading to missed deadlines and extra costs. In the complaints where it was necessary for us to open an Investigation, most often we found a combination of reasons for the new connection delay. Sometimes it was the fault of the energy retailer and/or distributor. Sometimes it was the fault of the customer and/or their builder/plumber/electrician. Sometimes it was a combination of these.

Long unexplained wait times

- For the customer to find out whether an application is approved.
- For the customer to receive a quote.
- For the customer to be given a timeframe for the new supply to be connected.
- Something else is required before installation can occur and the party who must provide it isn't told.

Incorrect/missing/confusing information

- Customer (or their builder/plumber/ electrician) fills the form out wrongly or leaves information out.
- Customer is given conflicting/wrong information about the technical requirements of a connection.
- Retailer sends the wrong information to the distributor (wrong address, wrong type of service order).
- Retailer sends the service order to the wrong distributor.
- Distributor provides technical information to the customer second or third hand, leading to information loss and/or misinterpretation.
- Distributor provides no reason for rejecting a service order or paperwork.
- Limited access to the departments within the distributor which can answer questions about delays, misinformation and errors.

Poor communication

- Customer seeking an explanation is bounced between the retailer and the distributor.
- The distributor refuses to speak directly to the customer, insisting they ring the retailer or have their plumber or electrician call to obtain the information.
- Distributor rejects a service order, but doesn't give the retailer a reason.

New connection delay case study 1

Customer submits unreadable paperwork; retailer raises the service order with the wrong distributor; supply is wrongly disconnected; inconvenience; costs

On 30 November 2015, Mr A's builder rang EWOV on his behalf to complain that, after applying for temporary power to the building site on 6 November 2015 she was still waiting for connection. The builder said she'd already unsuccessfully followed up with both the electricity retailer and the local electricity distributor and the delay was costing her money. She was seeking \$1,000 for reimbursement of generator hire and petrol costs, and \$5,000 for potential penalties she'd be charged for the delay in completing the build. We handled the complaint as an Assisted Referral and facilitated contact with the builder by a higher level contact within the company.

In April 2016, the builder recontacted EWOV. Although connection was now complete, her concerns about costs associated with the temporary connection were not addressed. We escalated the complaint to Real Time Resolution (RTR).

In late April 2016, we opened an Investigation because the retailer didn't respond in a timely manner to the builder's remaining concerns through the RTR process. We commenced reviews of contact notes, metering data, connection documentation and the service orders.

Responding to EWOV's Investigation, the retailer confirmed receipt of the initial paperwork on 6 November 2015. It said the Certificate of Electrical Safety as lodged had to be replaced because it wasn't readable. A new service order had been raised on 10 November 2015 and the builder was told to expect connection by 24 November 2015. It pointed out that a distributor has up to 10 business days from the date of the request to action a new connection request, and the expected date of completion of 24 November 2015 was within this range.

However, the retailer also admitted that it had raised the second service order with the wrong distributor, which delayed connection until 1 December 2015. Recognising its error, the retailer offered the builder a customer service payment of \$1,000, to cover the cost of hiring the generator to enable the build to progress.

During the course of the Investigation — and contrary to EWOV's policy of no disconnection during an open Investigation — supply to the property was disconnected for just over 24 hours on 5 May 2016. The builder contacted us to lodge another complaint, saying that the disconnection prevented a renderer and carpenter completing their work. We opened a second complaint and a separate Investigation into whether the disconnection complied with the *Energy Retail Code*.

Our Investigation of the disconnection found that it wasn't completed in accordance with the *Energy Retail Code*, because the retailer had disconnected while there was an open complaint with EWOV [section 116(1)(C) of the *Energy Retail Code*]. As a result, a Wrongful Disconnection Payment (WDP) of \$526.74 (\$500 a day pro rata) was payable to Mr A. We also assessed whether the retailer's response adequately addressed concerns about lost work time due to the disconnection, concluding that Mr A was out-of-pocket for the renderer, carpenter and builder costs. The retailer offered a further \$567 for inconvenience and costs. It also waived bills for usage at the building site for the duration of the dispute. A total of \$1,093.74 was paid to Mr A by cheque. The complaints were closed on this basis. 2015/33648 & 2016/9978 & WDP/2016/463

New connection delay case study 2

Retailer wrongly assures customer her new gas connection has been completed; customer lays concrete driveway; driveway has to be cut to install the service line; poor communication; inconvenience; costs

In November 2015 Mrs B made application for a gas service line and a meter at her new house. She said she was given a timeframe of 20 – 30 days. In January 2016, assured by her gas retailer that the installation was complete, she arranged for concrete to be laid around the house so she could move in.

When Mrs B's builder came out to connect her gas appliances, he couldn't find the gas meter. Mrs B engaged a plumber who checked and reported there was neither a gas meter nor a service line at the property. She said she took this up with the gas retailer. She was told it would raise a new service order, with the installation to be completed in 30 – 45 days. Mrs B was upset at the further delay, and that the concrete would have to be cut so the service line could be laid.

When Mrs B rang EWOV in mid-January 2016, we registered the complaint as an Assisted Referral and facilitated contact with her by a higher-level contact within the retailer. When a resolution wasn't achieved by late January 2016, we escalated the complaint to Real Time Resolution (RTR). At both Assisted Referral and RTR, the retailer said it couldn't provide an update until it received information from the local distributor. Mrs B agreed to wait a bit longer. The retailer undertook to stay in touch with her, complete the installation and then address any compensation claims. Mrs B returned to EWOV in early February 2016, saying she'd waited but hadn't heard any more. At this point we opened an Investigation.

Responding to our Investigation, the retailer said the distributor claimed it couldn't confirm the address of Mrs B's property due to a missing apostrophe in the street name. The retailer disputed that this should be a problem. The distributor later advised that its contractor went out to the property in mid-January 2016. (This was while Mrs B was still waiting for an update from the retailer.) Finding the driveway concreted, and not being able to contact Mrs B's builder to confirm where the service line should be laid, he laid it in the garden bed. The distributor's view was that neither it nor its contractor was responsible for the placement error. It said that, had it been able to go out to the property earlier, the service line could have been installed in the preferred location.

We reviewed emails between the retailer and distributor, customer call notes and a timeline of events, to assess responsibility for the delay. Our assessment was that the retailer had contributed to the delay, by wrongly telling Mrs B that the work was completed and the driveway could be concreted.

We also followed up with both the retailer and the distributor about why the meter was still not installed. The distributor said it required the plumber's name, contact number and licence number, and a certificate of compliance number. Mrs B provided this information to us and we forwarded it to the retailer. The driveway was cut and the gas service line was installed in early March 2016. The gas meter was installed four days later.

The retailer apologised to Mrs B for the inconvenience caused. Recognising its incorrect advice to her, it agreed to pay \$2,145 to cover the costs of reopening her driveway. The complaint was closed on this basis. 2016/726

New connection delay case study 3

Retailer archives the customer's connection request by mistake; no advice to the customer; customer prepares to sell the unit and realises there is no connection; inconvenience; customer looks to claim excessive costs

Mr C contacted EWOV seeking reimbursement of several thousands of dollars he said it cost him to complete a building project because of a new connection delay. In December 2015 he submitted two requests for new electricity connections at a property where he was building two units. During the construction Mr C took all of the electricity through unit one. It wasn't until he came to sell unit two that he realised it wasn't connected. In mid-October 2016, after he called the retailer to find out why, he received an email advising a service order had been sent to the local distributor.

Mr C called EWOV in late October 2016 to lodge a complaint about the delay. We raised an Assisted Referral and facilitated contact with him by a higher-level contact within his retailer. He returned to EWOV four days later, saying the retailer hadn't contacted him. We opened an Investigation.

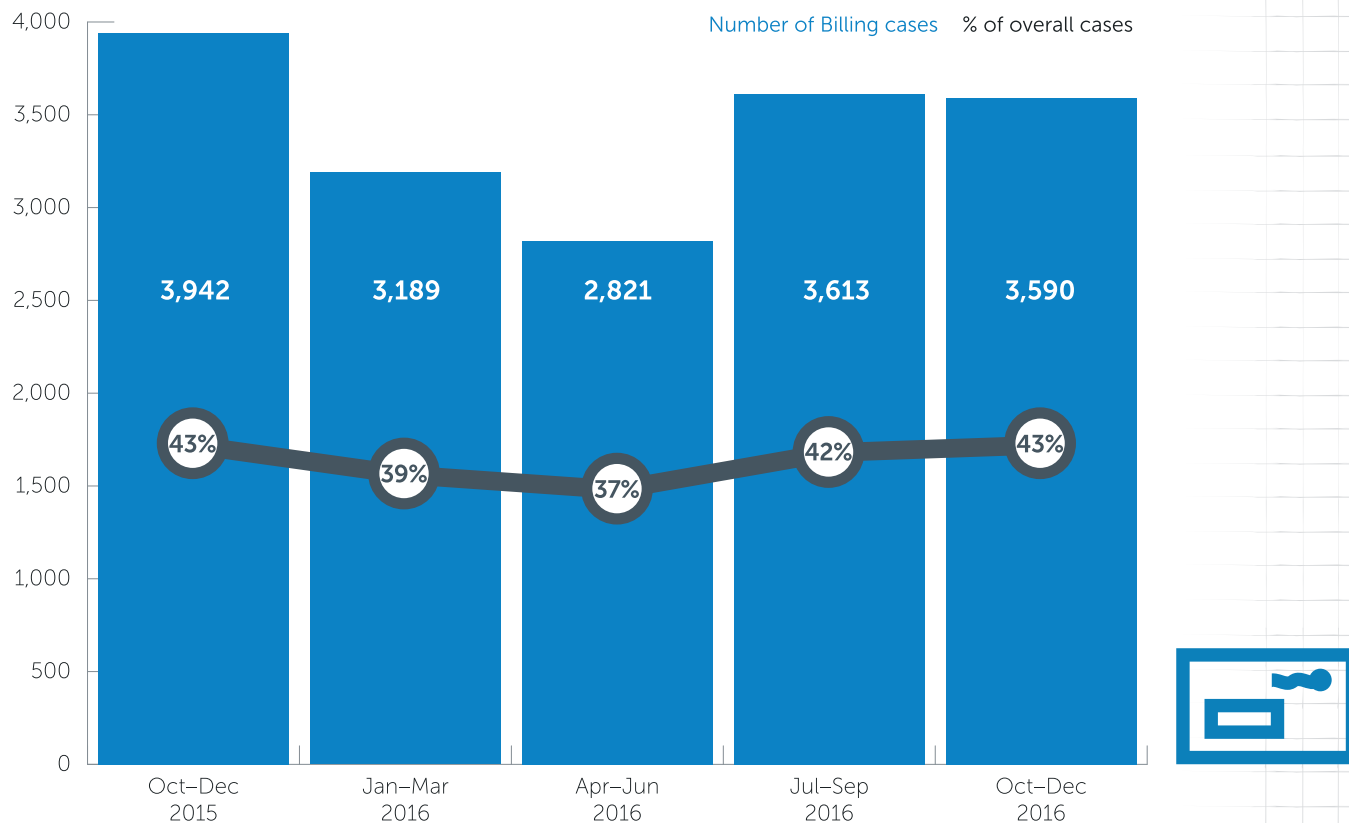
We reviewed the retailer's timeline of events, contact notes and Mr C's substantiation of his costs. The retailer admitted to incorrectly 'archiving' Mr C's original connection request for unit two, instead of actioning it. But it didn't believe this had stalled settlement of the sale of unit two.

Settlement on unit two went ahead on 3 November 2016. Our Investigation found that, even if connection had been completed before October 2016, settlement on unit two would have been delayed anyway due to the actions of Mr C's bank. Mr C acknowledged this. He admitted that his issues with the electricity retailer were more about customer service than compensation for the settlement delay.

Mr C accepted the retailer's offer of a credit of \$749.49 for its error in not actioning the connection request when it was made — \$224.49 (waiver of the new connection fee), \$275 (the cost to Mr C of obtaining a new certificate of electrical safety) and \$250 (credit in recognition of the inconvenience caused). The complaint was closed on this basis. 2016/23342

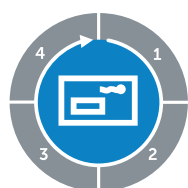
BILLING

FIGURE 1
Billing cases



COMPARED TO
LAST QUARTER
BILLING CASES

- 1%



COMPARED TO
THIS TIME LAST YEAR
BILLING CASES

- 9%



Billing Case Study

Water customer disputes New Customer Contribution (NCC) charges

Mr D, who was planning to build on a block, complained that his water corporation was seeking a payment from him of \$3,198.48 for contribution charges. He contacted EWOV seeking an independent assessment of the charges and advice of any applicable rules and regulations.

Mr D called EWOV in late October 2016. We registered the complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the water corporation. In early November 2016, Mr D returned to EWOV, dissatisfied with the information the water corporation provided. He said he'd simply been told that all customers seeking connection pay the same charges. He disputed this, saying other people had told him they didn't pay a fee. He also believed the previous owner of the property would have paid any contribution costs already. At this point we opened an Investigation.

Responding to our Investigation, the water corporation explained that the charges were contributions to infrastructure and associated activity costs around new connections, which had not yet been paid for Mr D's block. It provided the following breakdown of the \$3,198.48:

- Water New Customer Contribution of \$1,562.88
- Sewer New Customer Contribution of \$1,562.88
- Application Fee of \$72.72

Our Investigation confirmed that the charges were underpinned by the Essential Services Commission (ESC)'s New Customer Contributions: Explanatory Note, December 2013 (<http://www.esc.vic.gov.au/wp-content/uploads/2015/03/NCC-Guideline-ExplanatoryNote-20131204.pdf>), which states:

"New Customer Contributions ... (NCC), also known as developer charges, are a one-off, upfront charge that a water business may levy when a new connection is made to its water, sewerage or recycled water network. These charges apply in a range of situations. Generally, they are paid by developers who are subdividing land on the urban fringe or redeveloping sites within built up areas. They may also be levied when an existing property owner decides to connect to a service for the first time."

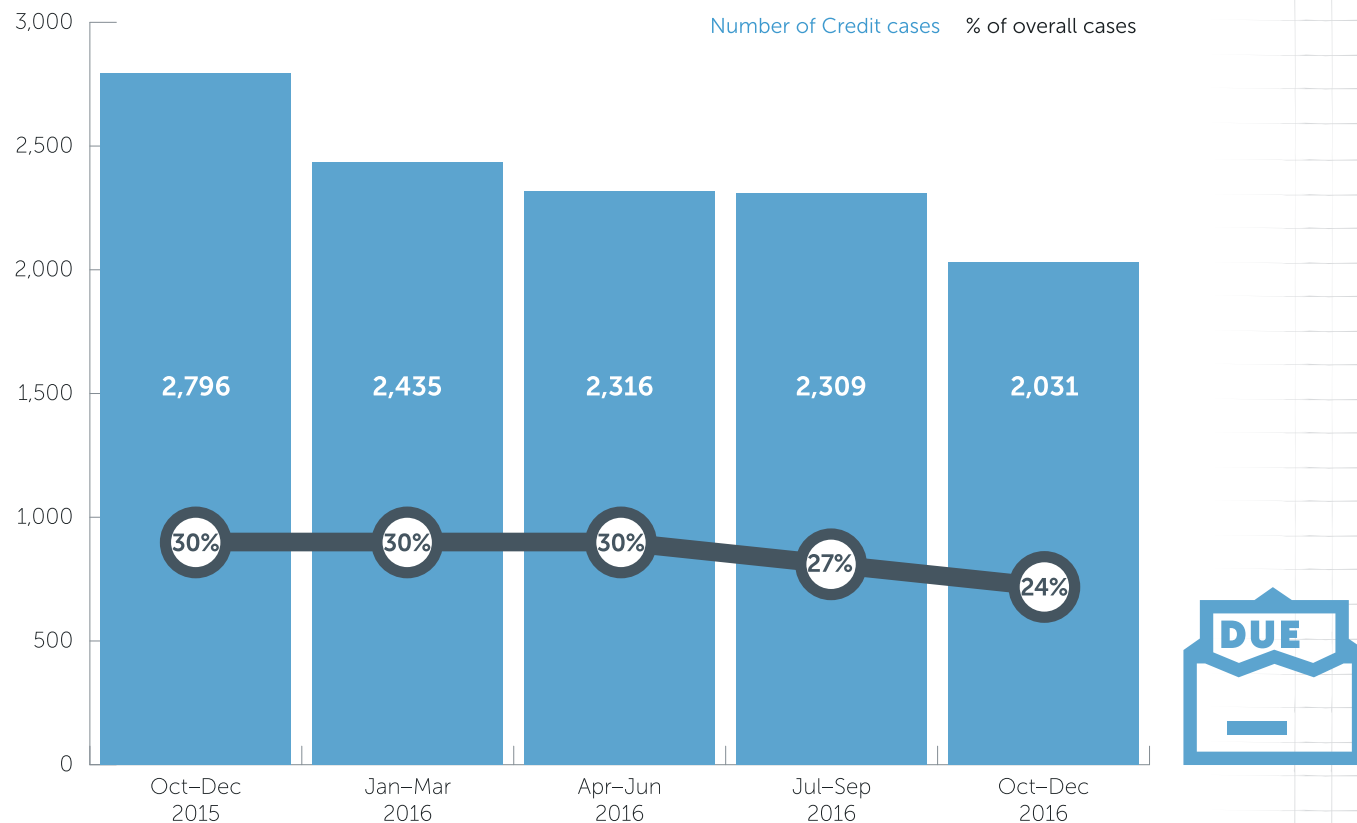
We confirmed that the charges were listed in the water corporation's schedule of fees and charges, published on its website as required under clause 1.3 of the ESC's Explanatory Note. We also confirmed that the property hadn't been connected to water or sewerage services previously, and no earlier applications to connect had been made.

Satisfied with EWOV's independent Investigation and explanation of the charges, Mr D undertook to pay the \$3,198.48 to the water corporation by an agreed date. The complaint was closed on this basis. 2016/23798

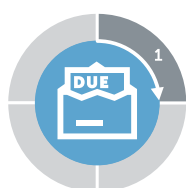
"The fees were contributions to infrastructure and associated activity costs around new connections, which had not yet been paid. "

CREDIT

FIGURE 2
Credit cases

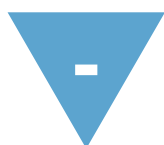


Note: The disconnection data in this report does not include LPG Deliveries Stopped cases.

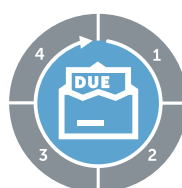


COMPARED TO
LAST QUARTER

CREDIT CASES

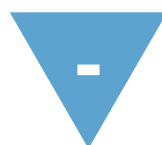


12%



COMPARED TO
THIS TIME LAST YEAR

CREDIT CASES



27%



Credit Case Study

Customer faces debt collection action after billing and payment allocation errors

In late August 2016, before switching to another electricity retailer, Mr E rang his then retailer to check how much he owed. He said he was told his account balance was \$142.51. He paid this and believed his account was finalised. After switching, he was contacted by his previous retailer and told he would still be sent a final bill. He said no bill arrived, but he was later contacted by a debt collection agency about a debt of \$400.91.

When Mr E first called EWOV in mid-September 2016, an Assisted Referral was raised. The retailer told Mr E it had recalled the debt from its collection house, but it didn't provide the information he was seeking about why he still owed \$400.91. Dissatisfied, Mr E returned to EWOV and we opened an Investigation.

Responding to our Investigation, the retailer confirmed it had recalled the debt, with no effect on Mr E's credit rating. It said the \$400.91 was the amount of the final bill sent to Mr E in early September 2016.

We reviewed Mr E's billing, the retailer's contact notes, call recordings and account reconciliation. This showed that billing for the period July 2015 to May 2016 had been issued, cancelled and rebilled. We confirmed that Mr E had been told that the rebilling was required.

Based on our review of emails provided by Mr E, the retailer rechecked its records and found that the \$142.51 payment Mr E made in August 2016 hadn't been allocated to his account until October 2016. He therefore owed only \$258.40. It offered him a \$50 customer service payment and a 3-month payment plan for the \$208.40 still owing.

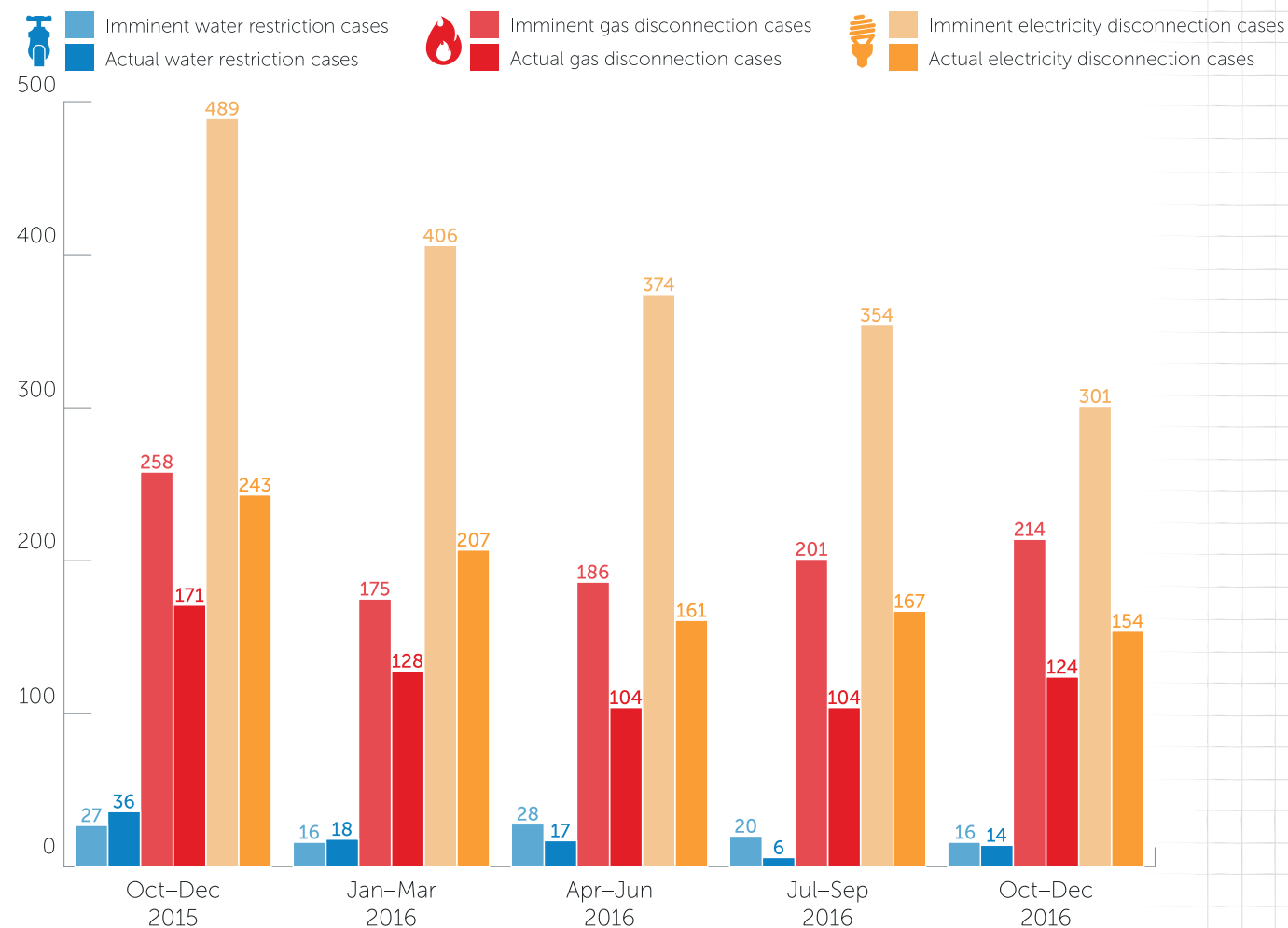
However, while it was checking its records, the retailer also found an overcharge error in Mr E's billing. When corrected, this brought his arrears down to \$90.63. To resolve the complaint, it credited this and closed the account.

The retailer acknowledged that it could have managed closure of the account and Mr E's concerns more effectively. It provided a further credit of \$150, which it sent to Mr E as a cheque. Mr E was satisfied with this outcome and the complaint was closed on this basis. 2016/20091

"The retailer rechecked its records and found that the \$142.51 payment Mr E made in August 2016 hadn't been allocated to his account until October 2016. "

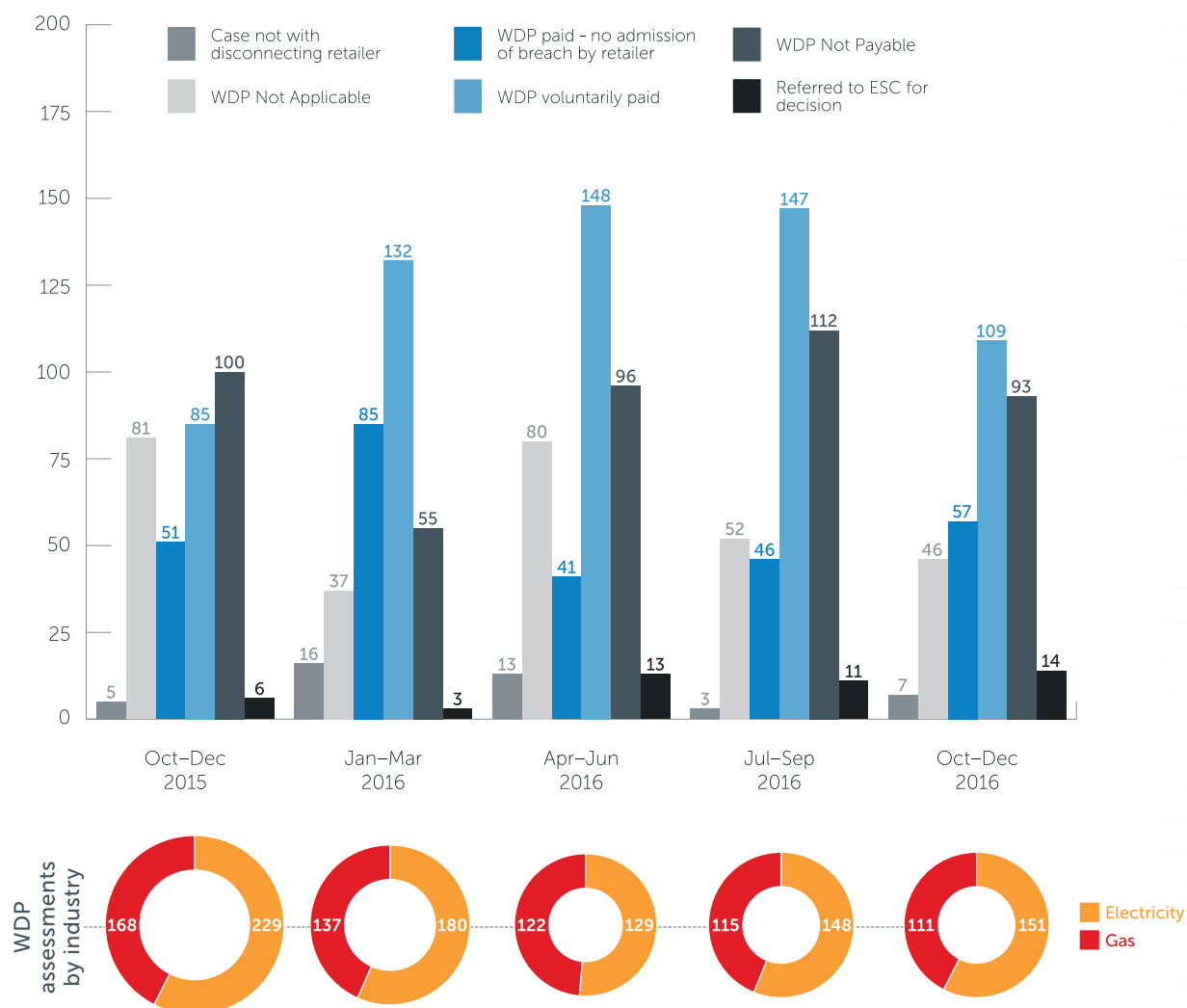
FIGURE 3

Credit-related disconnection and restriction cases



Note: The disconnection data in this report does not include LPG Deliveries Stopped cases.

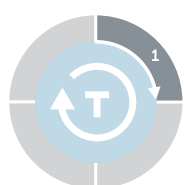
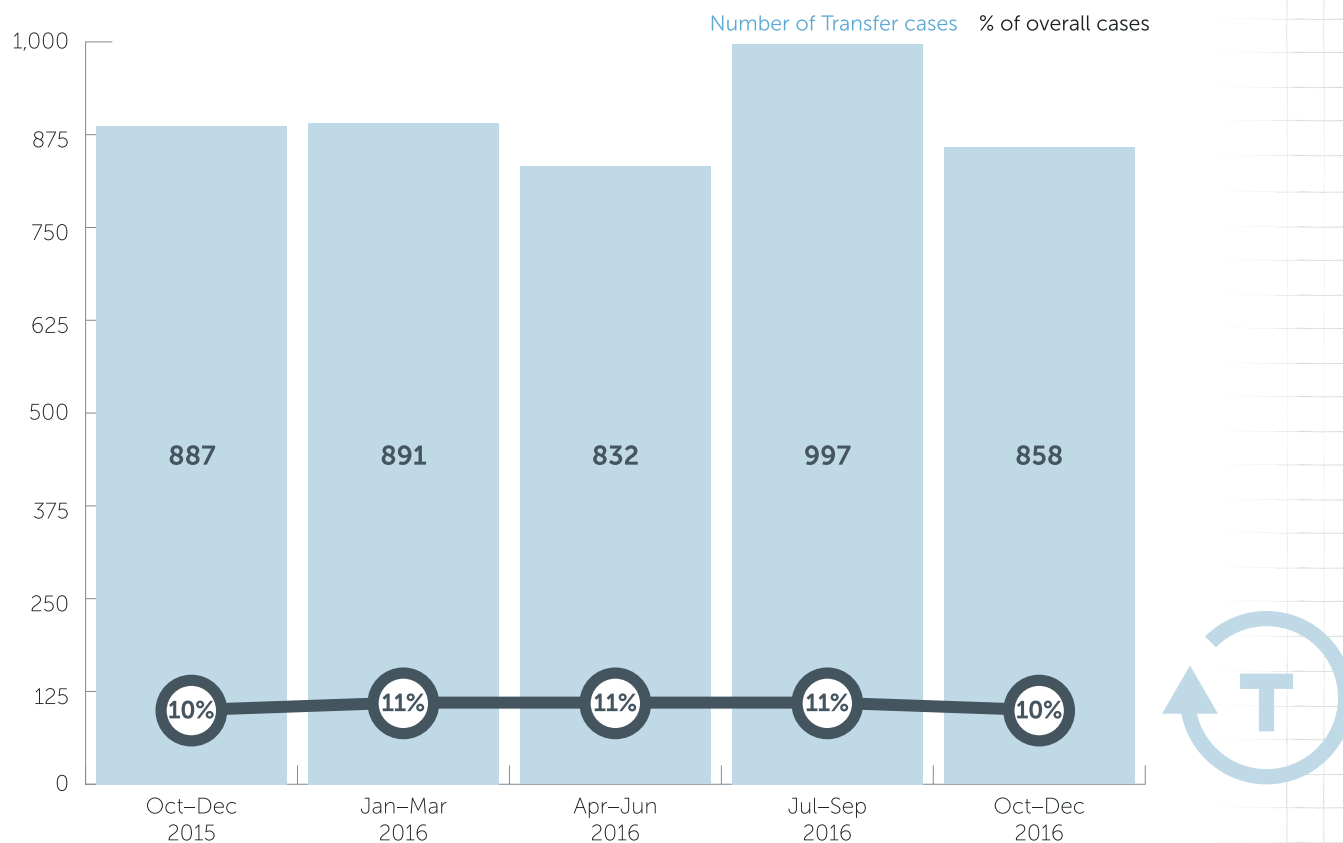
FIGURE 4
WDP outcomes



TRANSFER

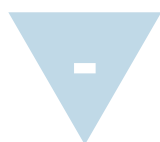
FIGURE 5

Transfer cases

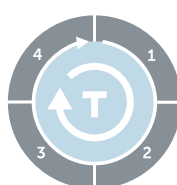


COMPARED TO
LAST QUARTER

TRANSFER CASES

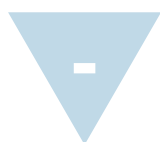


14%



COMPARED TO
THIS TIME LAST YEAR

TRANSFER CASES



3%



Transfer Case Study

Disconnection after electricity retailer doesn't correct its transfer error

Ms F complained that her business's electricity was off for four hours in early July 2016, leading to lost sales. When she rang her electricity retailer, she was told her account had been switched to another retailer in September 2015. She disputed this, saying she hadn't requested a switch.

When she called the 'new' retailer, Ms F was told the disconnection was for non-payment. The retailer said it had sent notices to an address she recognised as a neighbouring property. Ms F checked with the occupant who confirmed receiving bills addressed 'To the occupier'.

Ms F also complained about threats of debt collection action. She'd already transferred back to her own retailer but, fearing legal action, she'd paid \$1,025.33 to the 'new' retailer.

When Ms F called EWOV in mid-August 2016, we opened an Investigation, given the related issue of disconnection of supply. We checked that all collection activity on the debt had ceased and no default listing had occurred.

Responding to our Investigation, the 'new' retailer acknowledged the transfer and disconnection errors. It said that it had won billing rights to Ms F's property in error in September 2015. The retailer admitted the mistake had been identified. However, instead of correcting the error by returning Ms F to her retailer, it set up a 'Dear Occupier' account and sent the bills for Ms F's usage to the neighbouring property, which meant she didn't receive them.

The retailer agreed not to bill Ms F for 11 months' usage, waiving just over \$9,000 in debt. When it said it couldn't locate the payment she said she'd made, Ms F provided us with bank records showing a payment of \$1,025.33. The retailer reimbursed this to her by cheque.

Our separate Investigation of whether the disconnection was wrongful concluded that the deemed contract under s39 (7) of the *Electricity Industry Act* between Ms F and the retailer came to an end on 29 February 2016, before the disconnection on 7 July 2016. Because no contract existed between the customer and the retailer at the time of disconnection, a Wrongful Disconnection Payment (WDP) was not applicable. Ms F accepted this advice.

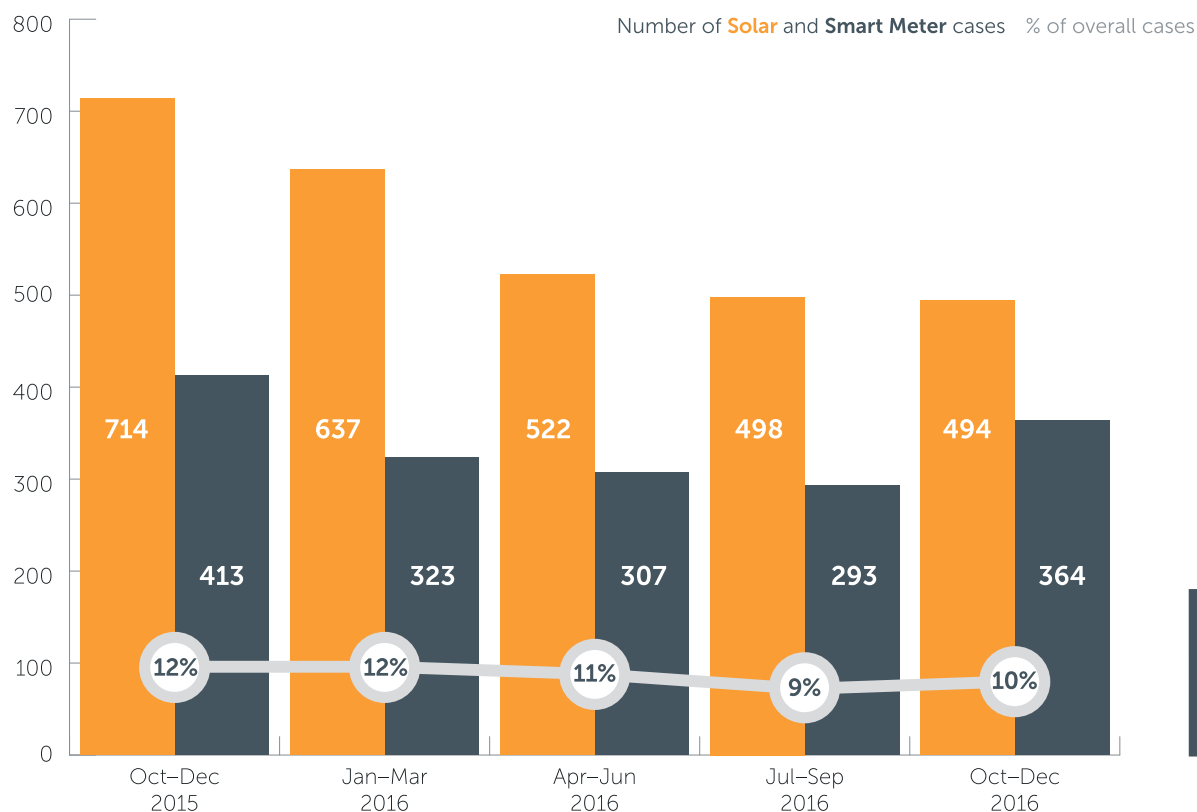
The complaint was closed on this basis. 2016/17612 and WDP/2016/770

"Instead of correcting the error by returning Ms F to her retailer, it set up a 'Dear Occupier' account."

SOLAR AND SMART METERS

FIGURE 6

Solar and Smart Meter cases



COMPARED TO
LAST QUARTER
**SOLAR AND SMART
METER CASES**



9%



COMPARED TO
THIS TIME LAST YEAR
**SOLAR AND SMART
METER CASES**



24%

Trends

Solar and Smart Meter cases (combined) made up 10% of all EWOV cases in the October to December 2016 quarter. This was up from 9% in the July to September 2016 quarter, but down from 12% in the October to December 2015 quarter.

Apart from a small 1% increase in the October to December 2016 quarter, Solar cases have shown steady quarterly falls since late 2015. Similarly, Smart Meter cases have been falling, and cases for the October to December 2016 quarter were down 12% on those for the last quarter of 2015.

However, compared with Smart Meter cases for the July to September 2016 quarter, the October to December 2016 quarter delivered a 24% uplift. In looking at this increase, we found that we had registered nearly 70% of the October to December 2016 quarter cases as Assisted Referrals. These customers had contacted their electricity retailer, but their concerns remained unresolved, so we used our Assisted Referral process to put them in contact with a higher-level retailer contact.

In Assisted Referral, EWOV hears only the customer's side of the story. Experience shows us that what a customer highlights as the problem when they ring EWOV doesn't always turn out to be the main issue when their complaint is examined. So, even though these complaints were registered as Smart Meter cases, the installation or correct functioning of the Smart Meter may not have turned out to be the main issue. The top three related issues customers raised with us were high bills, imminent disconnection and high estimation. With the rollout of Smart Meters now complete, we'll be monitoring to see what happens in the cases we receive in first quarter of 2017.

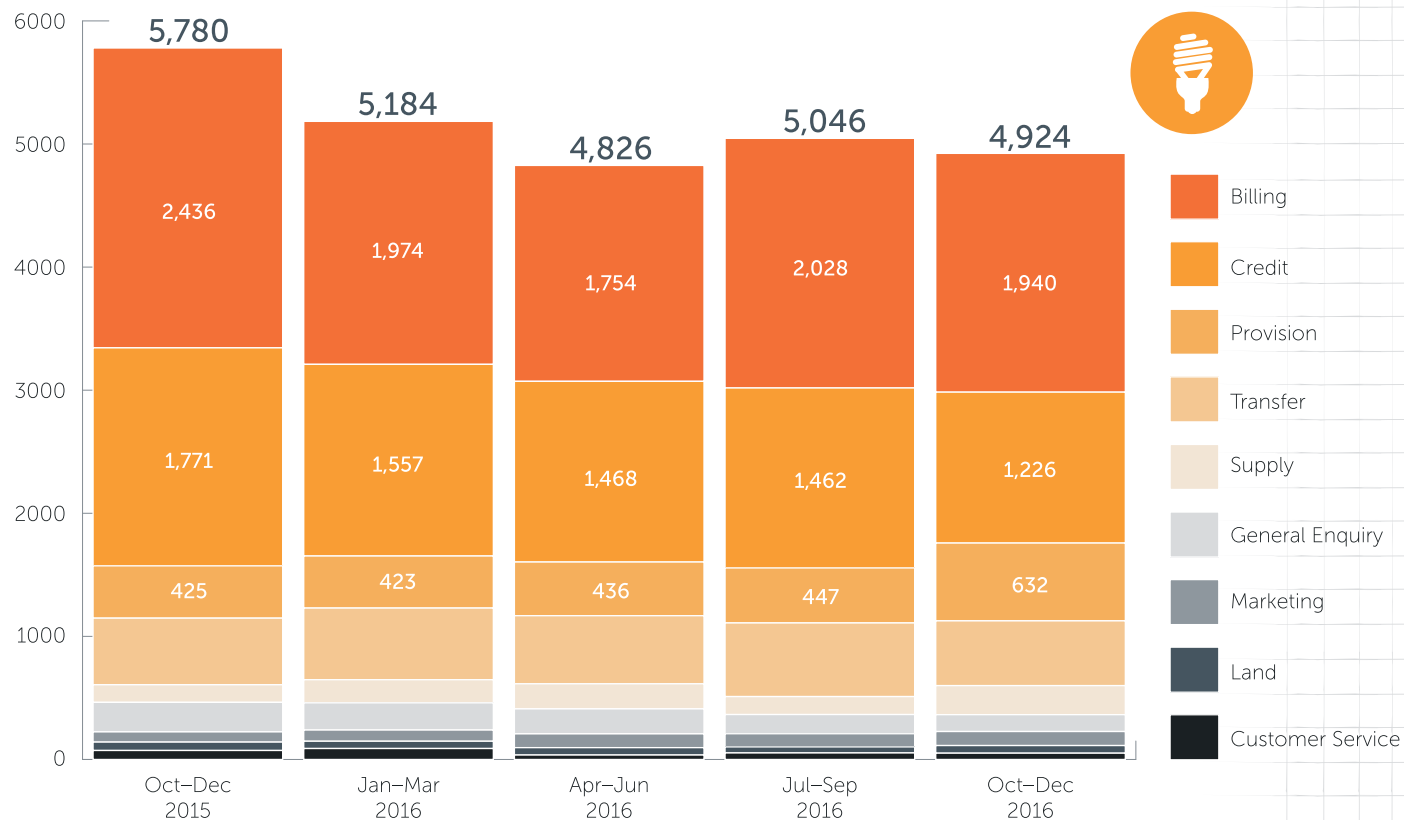
Looking ahead

On 31 December 2016, Victoria's Standard Feed-in Tariff and Transitional Feed-in Tariff both came to an end. Some 70,000 customers who were on these tariffs have been moved on to the current Feed-in Tariff. This may drive complaints to EWOV in coming quarters. There's [more about this change](#) on the Department of Environment, Land, Water & Planning website.

ELECTRICITY

FIGURE 7

Electricity cases



COMPARED TO
LAST QUARTER

**ELECTRICITY
CASES**



2%



COMPARED TO
THIS TIME LAST YEAR

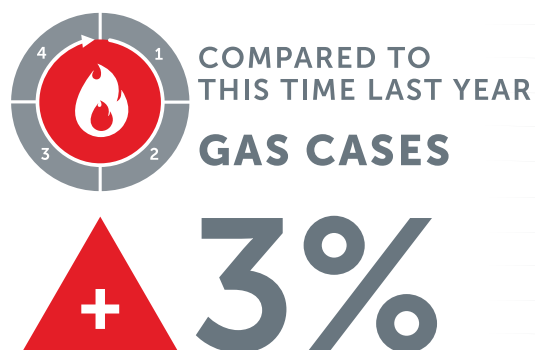
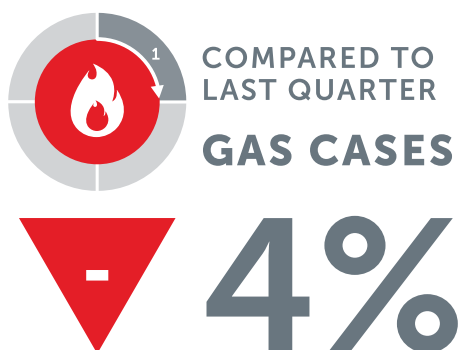
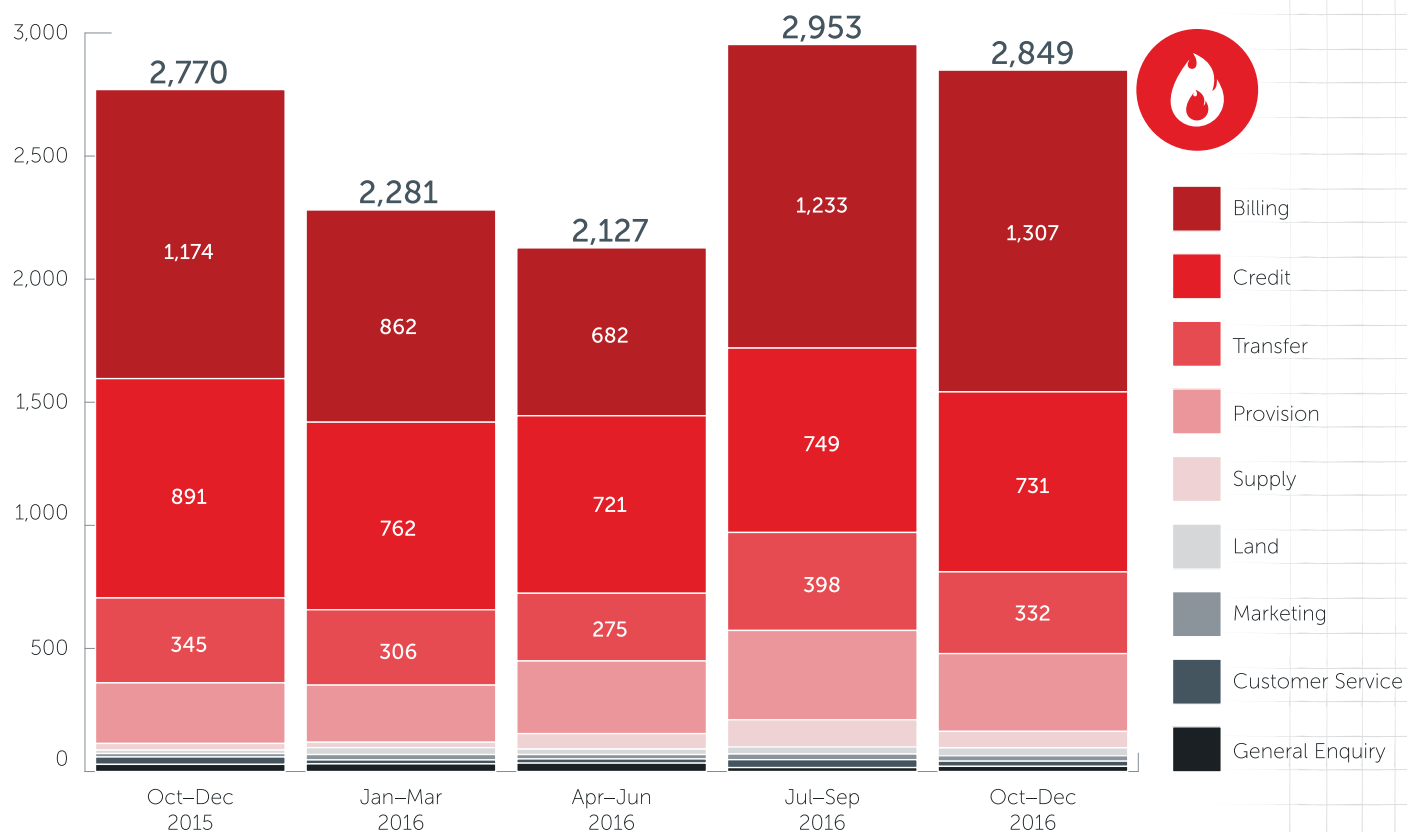
**ELECTRICITY
CASES**



15%

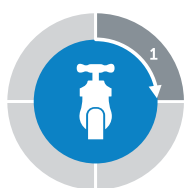
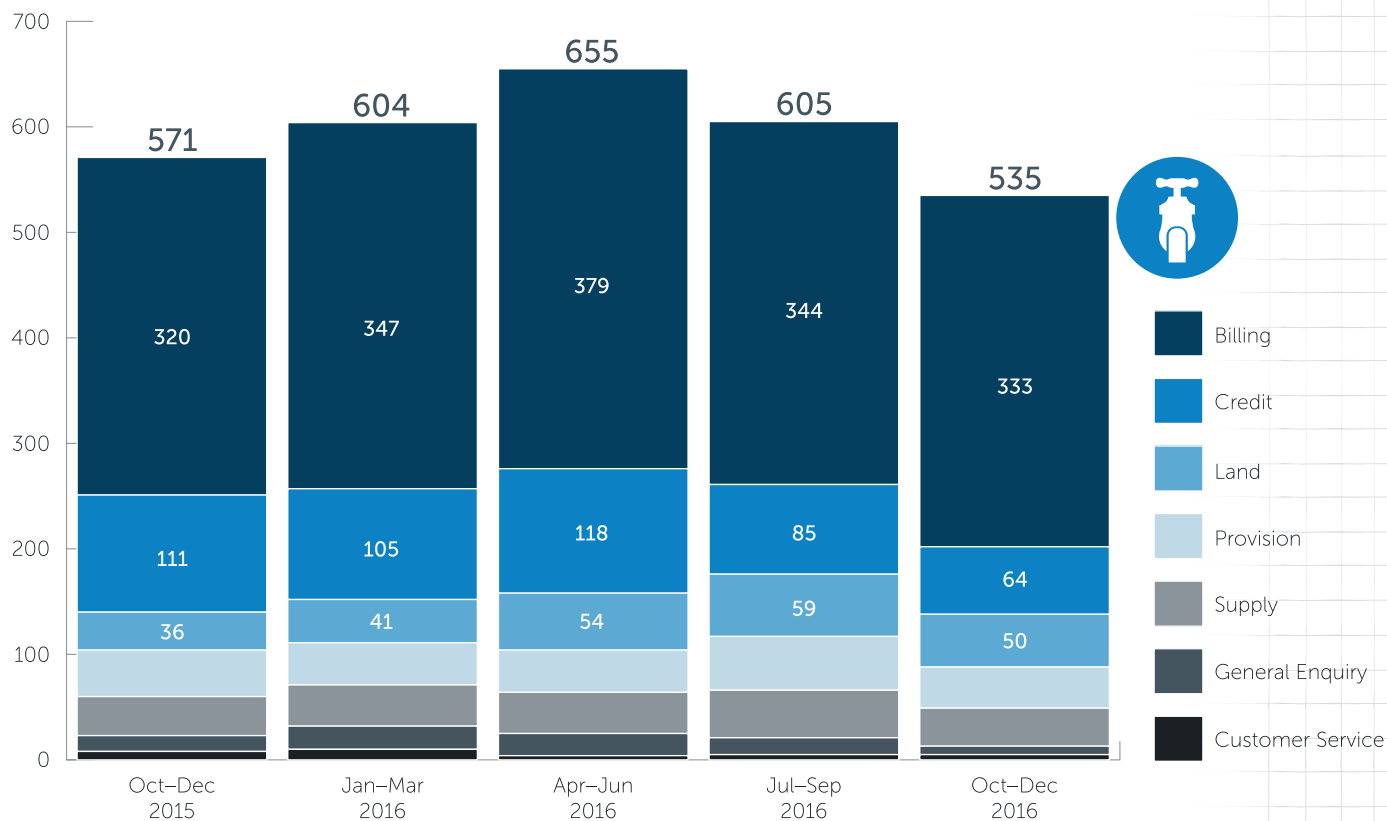
GAS

FIGURE 8
Gas cases



WATER

FIGURE 9
Water cases

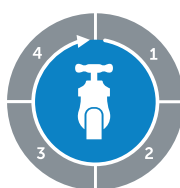


COMPARED TO
LAST QUARTER

WATER CASES



12%



COMPARED TO
THIS TIME LAST YEAR

WATER CASES



6%

SYSTEMIC ISSUES

Summary of systemic issue investigations opened and closed

October to December 2016

	Energy	Water	LPG
Open/Under Investigation	5	0	0
Closed	4	0	0

Note: Systemic issue investigations opened and closed during the above period that cannot yet be identified as being systemic haven't been included.

Issues identified through EWOV's case handling as systemic

October to December 2016

Gas supply interruptions when water entered gas mains

EWOV's case handling highlighted that customers in specific areas of Melbourne had experienced frequent and sustained gas supply interruptions due to water entering the gas mains. Some customers also experienced damage to the gas meter and/or regulator. In some cases, the gas distributor's crews weren't able to flush all of the water from the gas mains. This meant another crew had to come out, leading to extended periods without supply. The gas distributor advised it was aware of the problems. It said it was addressing the network issue, with some areas requiring upgrading of low-pressure mains to high-pressure mains. It undertook that eligible customers would receive Guaranteed Service Level payments in recognition of the outages. SI/2016/64

Gas service to property charges billed after years of no billing

A customer complained to EWOV about being billed for gas service to property charges, after years of not having to pay them because there was no gas usage recorded on the meter. Contacted by EWOV, the energy retailer confirmed a change of its billing process. Until September 2015, it had billed for distributor pass-through service to property charges only where an account had been set up in a customer's name. Its new process is to bill these charges to all connected properties, even if the property doesn't use any gas. SI/2016/29

Application of pay-on-time discounts and concessions

EWOV's case handling revealed evident customer confusion around pay-on-time discounts and concessions. Contacted by us, the energy retailer concerned said it calculates concessions on the basis of customers paying on time. This means that customers who don't pay by the due date initially receive a lower concession amount. The retailer said the difference is applied to these customers' subsequent bills. The Department of Health and Human Services confirmed to EWOV that energy retailers are able to apply concessions and pay-on-time discounts in this manner, as long as there is no overall financial detriment for customers. SI/2016/31

No date of issue on reminder notices

EWOV's case handling highlighted that some of the payment reminder notices issued by one energy retailer didn't include the date of issue as required by clause 109(2)(a) of the *Energy Retail Code*. The retailer applied Wrongful Disconnection Payments to all affected customers. SI/2015/56

PUBLIC SUBMISSIONS MADE BY EWOV

Consumer Protections for Behind the Meter electricity supply Consultation on regulatory implications

Energy Market Transformation Team, Council of Australian Governments (COAG) Energy Council

Our submission drew on EWOV's experience to respond specifically to four aspects of this consultation paper — equitable dispute resolution, vulnerable customers, new products and services and provision of information. In EWOV's view, it is critical that there be thorough consideration of how customer protections continue to fit within new energy business models and associated products and services.

- Access to free and independent external dispute resolution must continue to play a central role in the suite of customer protections.
- There must be protections for vulnerable customers to be assured access to supply and hardship assistance.
- New products and services must not be allowed to fall outside the jurisdiction of schemes such as EWOV because they are deemed to be commercial activities.
- Customers must be assisted with information that enables them to make fully informed decisions when they enter contract arrangements for these products and services.

[EWOV's submission online](#)

[About this COAG consultation](#)

Safety Net for Victorian Energy Consumers Facing Payment Difficulties Draft Decision | Customer Advice Manual | Amendments to the Energy Retail Code

Essential Services Commission (ESC)

EWOV's submission on the ESC's Draft Decision broadly supported the proposed safety net framework, particularly its emphasis on early engagement and energy management assistance. We welcomed the immediate assistance and tailored assistance support elements, which we think will help retailers engage with customers and raise awareness of the retailer support available to them.

We also took the opportunity to highlight some areas, which we think would benefit from greater clarity to achieve the framework's safety net objectives, including:

- inclusion of information to highlight that EWOV is free and independent in the Customer Advice Manual and on customer notices
- clearer explanation of how the safety net can support existing customers who already have significant account arrears, including early transition to Connect Support
- retailer staff training and greater clarity under the Energy Retail Code to build the effectiveness of retailer referrals to support organisations
- putting customers with an established pattern of payment problems on the best possible retail tariff as early as possible to help reduce their energy costs and limit retailer exposure to debt.

- clearer practical guidance to help retailers understand how to deliver effective methods of energy management support
- extension to pay-as-you-go customers of the proposed restriction on retailer switching by customers receiving the Energy Costs form of Connection Support
- aspects of the Code amendments around payment plans, which we believe could be clearer and/or more precise.

[EWOV's submission online](#)

[About this ESC consultation](#)

Transfer Accuracy Rule Change Request Draft Determination

Australian Energy Market Commission (AEMC)

EWOV's submission gave in-principle support for the AEMC's proposal to improve the process of correcting erroneous transfers and completing delayed transfers. Based on the information in the Draft Determination, we agree that clarification of roles for new and old retailers in an erroneous transfer situation will improve customer experience and increase confidence in the market. Given our complaint handling experience that address mismatches continue to result in transfer errors, billing errors and disconnections, we supported a data cleanse of MSATS data by the Australian Energy Market Operator (AEMO)

[EWOV's submission online](#)

[About this AEMC consultation](#)

GLOSSARY

More about EWOV's [issue](#) and [complaint terminology](#) can be found on our website.