

# Res ONLINE



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

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# THE OMBUDSMAN'S VIEW

## On issues watch – gas distribution cases

In the April to June quarter of 2017, EWOV received 26% more gas distribution cases than in the first quarter of 2017. Against those for the April to June quarter in 2016, gas distribution cases are up 49%. In this issue of *Res Online*, we take a look at some of the issues driving those increases – problems with both new connections and existing connections, quality of gas supply, unplanned outages and network assets.

We also use two case studies to illustrate the experiences of some gas customers. In the first case, an elderly customer contacted EWOV, frustrated by ongoing problems of losing his gas supply after water entered the gas pipes during heavy rain. This left him unable to cook or heat his home. In the second case, the customer had to pay \$1,500 in out-of-pocket expenses when the abolishment of a gas meter wasn't completed properly, delaying the demolition and rebuilding of his property.

[Gas Distribution Cases Issues Watch](#)

## Other case studies in this issue

- [Charging for water services to a vacant property](#)
- [High usage, high bills, but no energy audit](#)
- [New property address and meter confusion](#)



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# THE BIG PICTURE

APRIL - JUNE 2017

Compared to last quarter:

CASES  
▼ 13%

ENQUIRIES  
▼ 17%

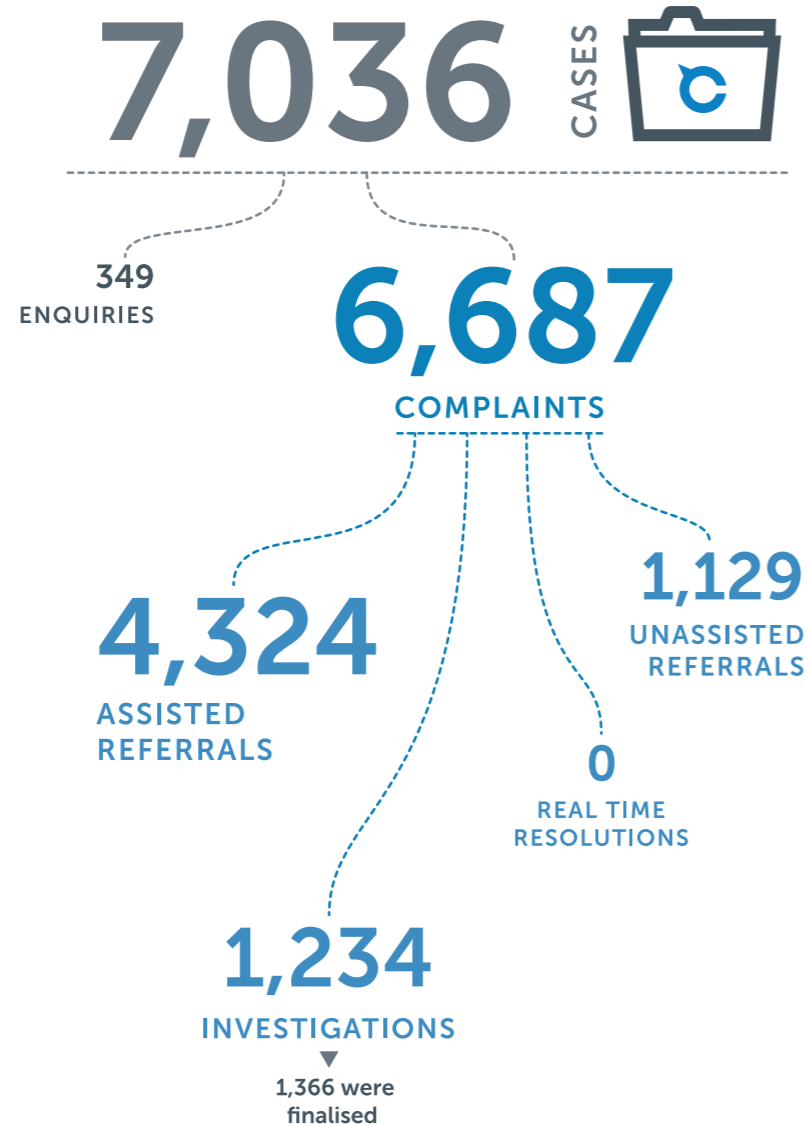
UNASSISTED REFERRALS  
▼ 8%

ASSISTED REFERRALS  
▼ 14%

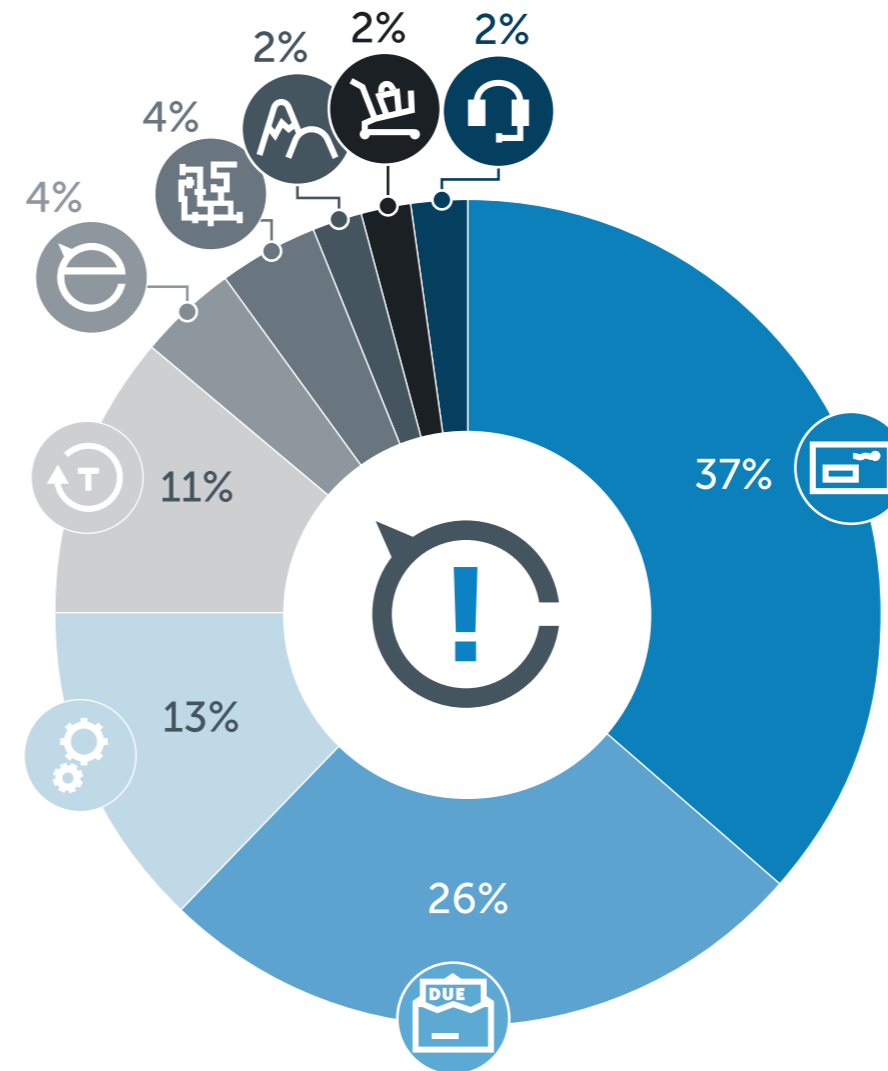
REAL TIME RESOLUTIONS\*  
▼ 100%

\*RTR is now closed. This has resulted in a large drop in RTR cases.

INVESTIGATIONS  
▼ 13%



The issues customers complained about



Compared to last quarter:

BILLING  
2,590 cases  
▼ 19%

CREDIT  
1,805 cases  
▼ 16%

TRANSFER  
802 cases  
▼ 15%

PROVISION  
941 cases  
▲ 2%

GENERAL ENQUIRY  
267 cases  
▲ 4%

SUPPLY  
258 cases  
▲ 5%

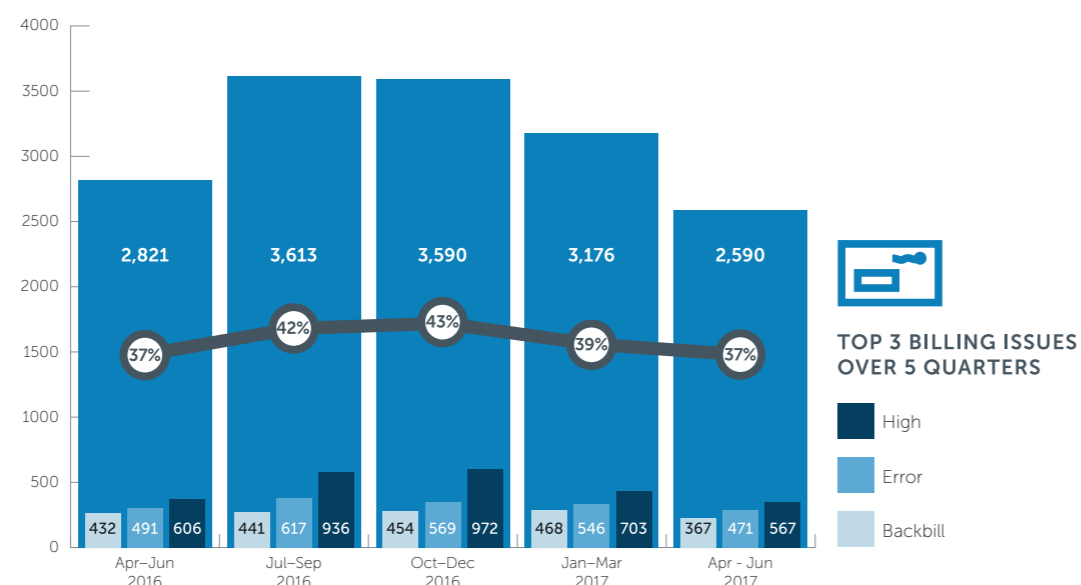
LAND  
148 cases  
▼ 15%

MARKETING  
118 cases  
▼ 15%

CUSTOMER SERVICE  
107 cases  
▲ 27%

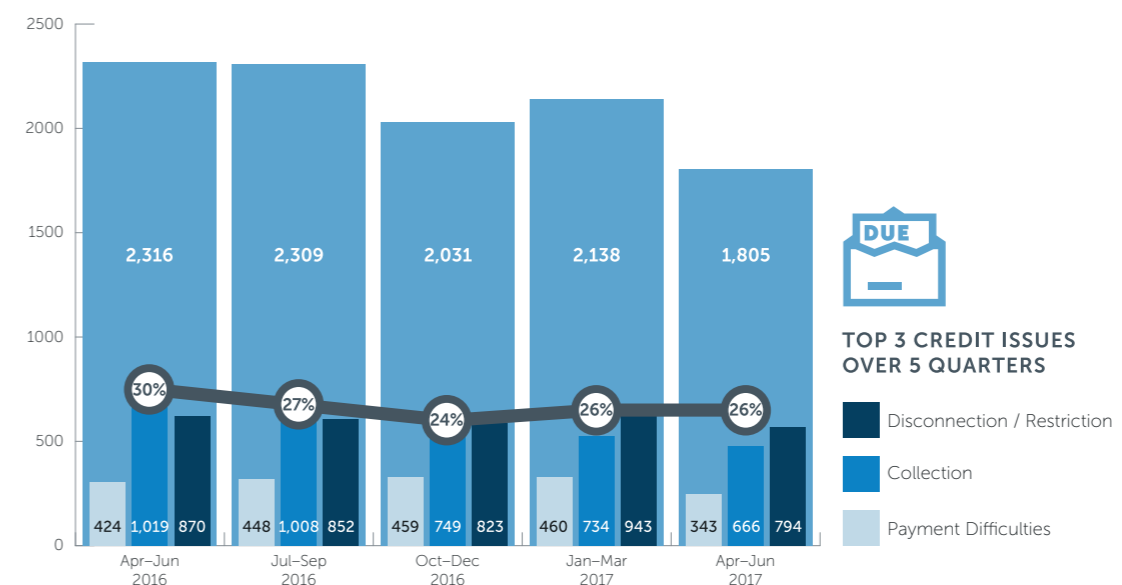
## Billing cases

Number of Billing cases % of overall cases



## Credit cases

Number of Credit cases % of overall cases



# ISSUES WATCH

## Gas distribution cases trending up

We're monitoring some increases in gas distribution cases.

EWOV received 248 gas distribution cases in the April to June 2017 quarter, 26% more than in the previous quarter (197), and 49% more than in the same quarter in 2016 (166).

Distribution issues are about the infrastructure that delivers gas to a property — most commonly, provision (the connection of a new property to the gas network or the reconnection of an existing property), supply (the delivery of the gas; planned and unplanned interruptions) and land (the effect of the gas company's activities or network assets on a customer's property). EWOV has four gas distribution scheme participants.

## The issues customers have complained about

Most of the 'top 5' gas distribution complaints (below) were registered as Assisted Referrals or Unassisted Referrals. Complaints that required the most EWOV Investigations were the ones about 'network assets' (33% investigated) and 'supply quality' (29% investigated).

### 1. Provision: existing connections

- Delayed meter/service line abolishment
- The meter exchange process (notification prior, restoration works, placement of new meter)
- Not having their service reconnected post-works e.g. pilot light not relit.

### 2. Provision: new connections: delays

- Connection taking longer than the advised 20 – 30 business days, with no advice to customers that this timeframe won't be met; customers find out when they call their distributor to ask what's happening
- Customers waiting up to 6 months for works to be completed, only to be told that further delays are likely
- Extra costs for customers as a result of delays, e.g. not being able to move into the property (paying rent and a mortgage); prolonged building timeframes; machinery onsite that can't be used; penalties from tradespeople (at development sites).

In the feature in *Res Online 18* (February 2017), we looked at the issues driving complaints about new connections. [You'll find that analysis on our website here.](#)

### 3. Supply: quality

- Water in gas pipes, often causing multiple/frequent outages and sometimes damage to appliances, and worsening as the weather gets wetter
- Customer frustration where the distributor comes out to the property several times, but provides a temporary fix, rather than a long-term solution.

### 4. Supply: unplanned outages

- Outage caused by water in gas pipes and pressure issues
- Gas service not reconnected after works, e.g. pilot light not relit.

### 5. Land: network assets

- Asset placement, e.g. where a pipe or meter has been installed; whether that was safe
- Leaks from the meters of gas lines.

Under section 3.1 b of the *Gas Distribution System Code*; a distributor must use its best endeavours to connect a customer's gas installation: at a supply address previously supplied by the distributor within one business day or within a period agreed with the customer or at a new supply address on the date agreed with the customer or, where no date is agreed, within 20 business days.



## Case study 1: Water in the gas pipes

*Loss of supply on multiple occasions, eliminating possible causes to achieve a permanent solution*

**Case number:** 2017/8321

Mr K complained about losing his gas supply on several occasions, due to water in the gas pipes after heavy rain. An elderly customer, he was particularly concerned about being left without heating or cooking facilities. He was also frustrated at the need to keep calling the gas distributor to have the water pumped out and the gas restored. Mr K said the distributor put the problem down to ageing pipes, which needed to be replaced.

When Mr K contacted EWOV, we registered his complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the distributor. When he returned to us nine days later, saying he hadn't been contacted by the distributor, we opened an Investigation.

In its initial response to our Investigation, the distributor confirmed records of five fault calls made by Mr K. While it apologised for the inconvenience caused, it said all of the reported supply interruptions had been resolved within 10 hours. It also said Mr K's area would be reviewed for an upgrade in March 2018.

To help it assess the reason for the persistent problems, the distributor installed a recorder to measure the pressure at Ms K's meter. It also arranged for a leak survey. The timing of these tests coincided with a period of forecast wet weather.

Through the testing, the distributor identified 10 leaks which required attention. By late May 2017, it advised that most of the major leaks had been addressed. By early June 2017, it said all leaks had been fixed and eight weeks of reinstatement works were underway to restore the ground.

We reviewed the notes of the distributor's contact with Mr K, its documentation of the leaks identified, and the repair works undertaken.

Mr K confirmed that, despite heavy rain since the works were undertaken, his gas supply hadn't been interrupted. The distributor undertook to monitor the street for any further supply issues. Mr K was satisfied that the problems underpinning his complaint had been addressed.

The complaint was closed on this basis.

**When he returned to us nine days later, saying he hadn't been contacted by the distributor, we opened an Investigation.**



## Case study 2: Delays and costs

*Abolishment works not completed correctly; knock-on effect on building demolition work and timeframes*

**Case number:** 2017/7330

Mr M contacted EWOV in April 2017 seeking compensation for out-of-pocket expenses he incurred when abolishment of a gas meter wasn't completed on time, in line with the work order. In June 2016, with his property about to be demolished and rebuilt, Mr M had requested his gas meter be abolished. A new service was to be connected at the rear of the property. He said that, at the end of the demolition process, workers onsite hit a gas line. They capped it until it could be removed. Mr M couldn't understand why the line was still there. He said he was told a temporary fix would be in place by mid-March 2017, and that would allow demolition work at the property to continue. This didn't happen. Charged \$1,500 for the delays to the house's demolition, he sought reimbursement from the gas distributor. He said the distributor wouldn't compensate him, even though he had receipts.

When Mr M contacted EWOV with his complaint in early April 2017, we registered it as an Assisted Referral and facilitated contact with him by a higher-level contact within the gas distributor. In early May 2017, he recontacted us saying that, although he had received an initial call from the distributor seeking cost substantiation documents, there was no next-day return call as promised and his follow-up emails weren't answered.

We opened an Investigation into Mr M's complaint. As part of our Investigation, we reviewed the documents he provided to substantiate his costs, including a photo of the damage from the works completed and the work agreement form.

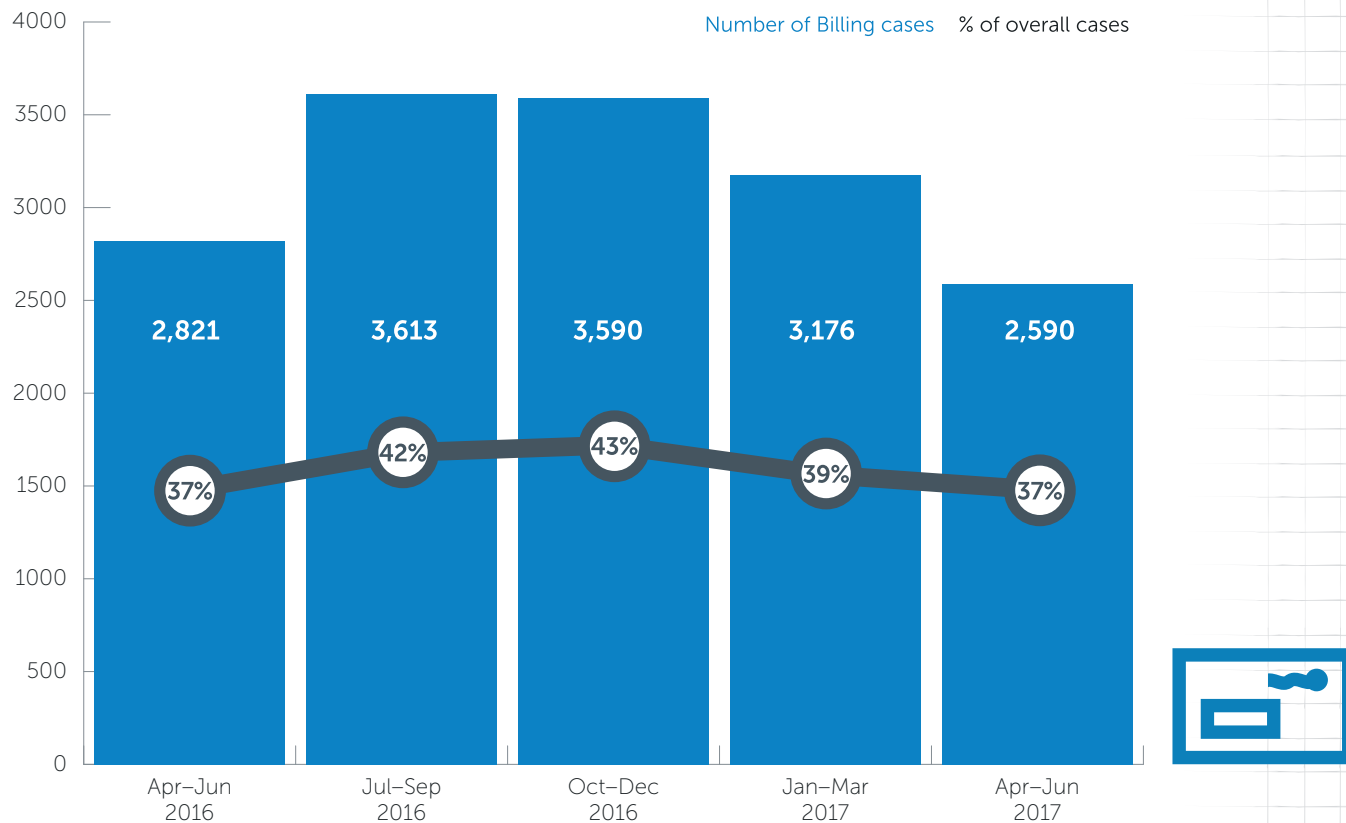
Responding to EWOV's Investigation, the distributor apologised and acknowledged the delays, attributing them to a handover of contractors. It agreed to reimburse the out-of-pocket expenses, providing Mr M with a cheque for \$1,500. The distributor also advised a works completion timeframe of the end of June 2017. Mr M was satisfied with this outcome.

The complaint was closed on this basis.

**He said the distributor wouldn't compensate him, even though he had receipts.**

# BILLING

FIGURE 1  
Billing cases

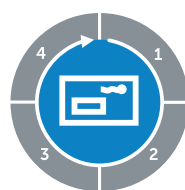


COMPARED TO  
LAST QUARTER

**BILLING CASES**



**19%**



COMPARED TO  
THIS TIME LAST YEAR

**BILLING CASES**



**8%**



## Billing Case Study: Charging for water services to a vacant property

*Property unoccupied; customer understanding of applicable fees and charges; the value of independent advice*

**Case number:** 2017/3893

Mr F was disputing a bill of \$195.13 for a service charge and wastewater access to what he described as a 'vacant block of land'. When he contacted EWOV, we registered his complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the water corporation. When he recontacted us saying he hadn't been able to reach a resolution with the water corporation directly, we opened an Investigation.

Responding to our Investigation, the water corporation initially disputed EWOV's jurisdiction to deal with the complaint. We corrected this misunderstanding, with the reminder that EWOV has the power to investigate the application of fees and charges – including, for example, whether a customer has been charged the correct amount.

The water corporation clarified that, even though the customer didn't live there or use the water, the property was not a vacant lot. It said the charges were correct because the property was metered. It provided information about the applicable charges, billing issued and its review of the *Water Act 1989* provisions.

We reviewed the relevant sections of the water legislation (sections 259 and 144), which both the customer and the water corporation had cited. We explained EWOV's power to investigate whether the billing was correct, but that we could not determine whether it was fair and reasonable that the water corporation actually applied the charges.

Mr F accepted EWOV's limited jurisdiction. We provided him with our calculations of the service charge and wastewater access (even where not connected) for the past three financial years. We also compared this to the Essential Services Commission (ESC)'s pricing information for the water corporation.

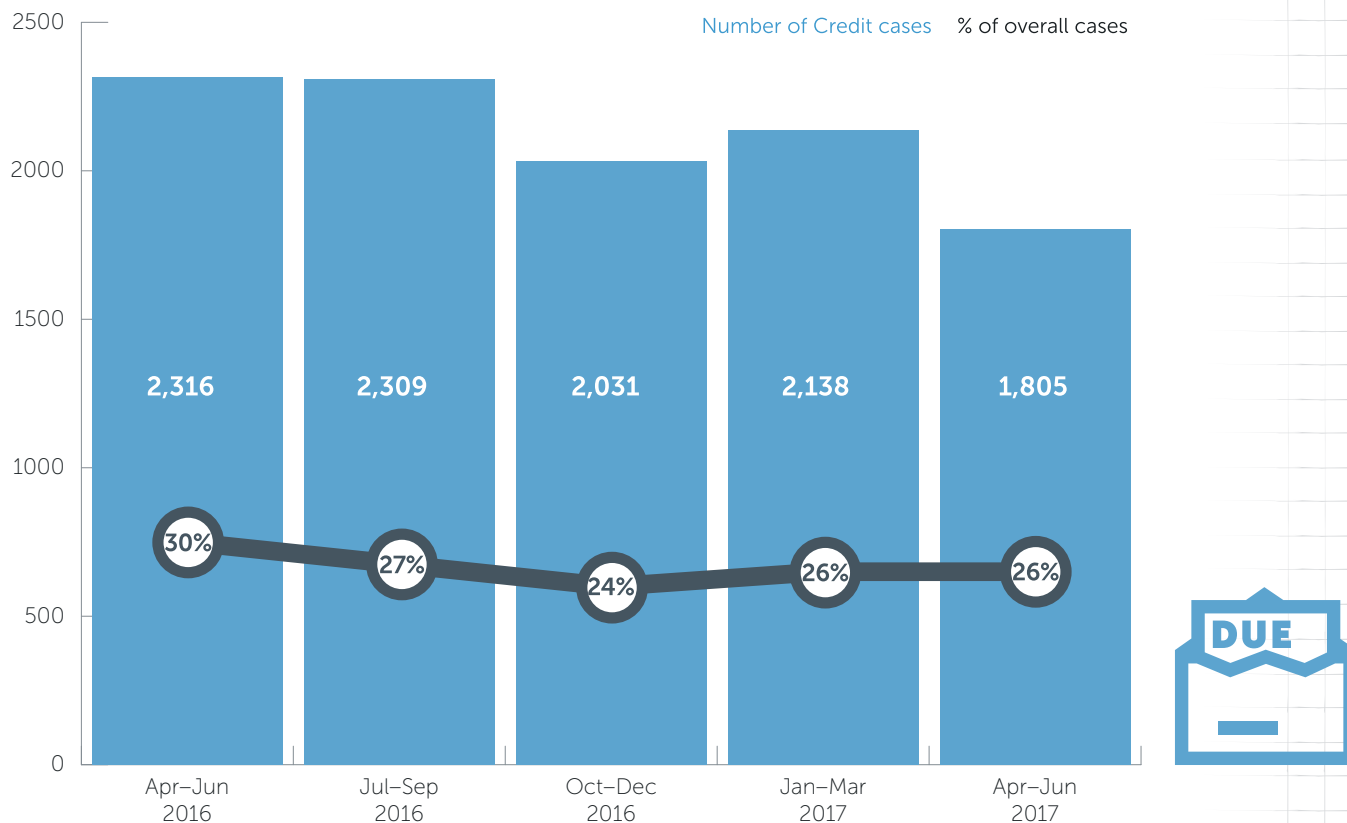
When Mr F remained concerned that the calculation of the wastewater access tariff wasn't correct, we sought further information/substantiation from the water corporation. This revealed that Mr F had mistakenly looked at the charges for a vacant lot (unmetered), which weren't applicable to his property because it had been metered since October 2012. We confirmed that the 2016-17 charges for a property of this type were correct at \$195.13.

Mr F accepted the independent advice from EWOV. The complaint was closed on this basis.

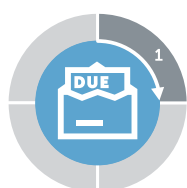
The water corporation initially disputed EWOV's jurisdiction to deal with the complaint.

# CREDIT

FIGURE 2  
Credit cases

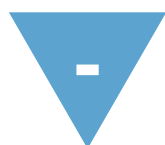


**Note:** The disconnection data in this report does not include LPG Deliveries Stopped cases.

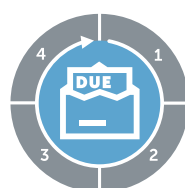


COMPARED TO  
LAST QUARTER

**CREDIT CASES**

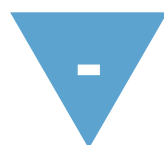


**16%**



COMPARED TO  
THIS TIME LAST YEAR

**CREDIT CASES**



**22%**



## Credit Case Study: High usage, high bills, but no energy audit

*High usage; high arrears; failed payment plans; customer declines energy audit*

**Case numbers:** 2017/5018 and 2017/5019

Ms L was concerned about high electricity and gas billing, despite paying \$110 a fortnight towards each account and her home's occupants falling from six to three in recent years. She was seeking a \$1,000 reduction in her electricity arrears, an investigation into her high gas consumption, and an explanation for a recent direct debit of \$554 from her bank account.

When Ms L rang us in early March 2017, we registered the complaint as an Assisted Referral and facilitated contact with her by a higher-level contact within the energy retailer. In mid-March 2017, Ms L returned to EWOV asking that we investigate her concerns, because the retailer had called her at an inconvenient time and she'd asked for a call back, which never came.

Responding to our Investigation, the energy retailer advised that Ms L's arrears stood at \$4,120.90 for electricity and \$555.54 for gas. It calculated that she was using around \$84 a fortnight in electricity and \$120 a fortnight in gas. It offered Ms L a gas payment plan (usage and arrears) of \$145 a fortnight and an electricity payment plan (usage and arrears) of \$254 a fortnight. For electricity, it also offered two other options — one based on repayment of her arrears only (with all future bills to be paid by their due date) and the other a payment plan of \$84 a fortnight conditional on Ms L's entering its hardship program.

In light of the difference between what Ms L was seeking and her retailer's payment plan offers, we suggested an energy audit to help us work out whether her property had the capacity to use the electricity and gas for which she was being billed. Ms L didn't believe an energy audit was required and wouldn't agree to one.

In the absence of an energy audit, we based our Investigation of Ms L's concerns on a review of the bills she'd received, account reconciliations and meter data. This confirmed her seasonal usage patterns were similar to those of the year before.

The energy retailer found that the \$554.54 was wrongly debited from Ms L's account after an earlier payment plan came to an end. It said this amount had been refunded to her a few days later.

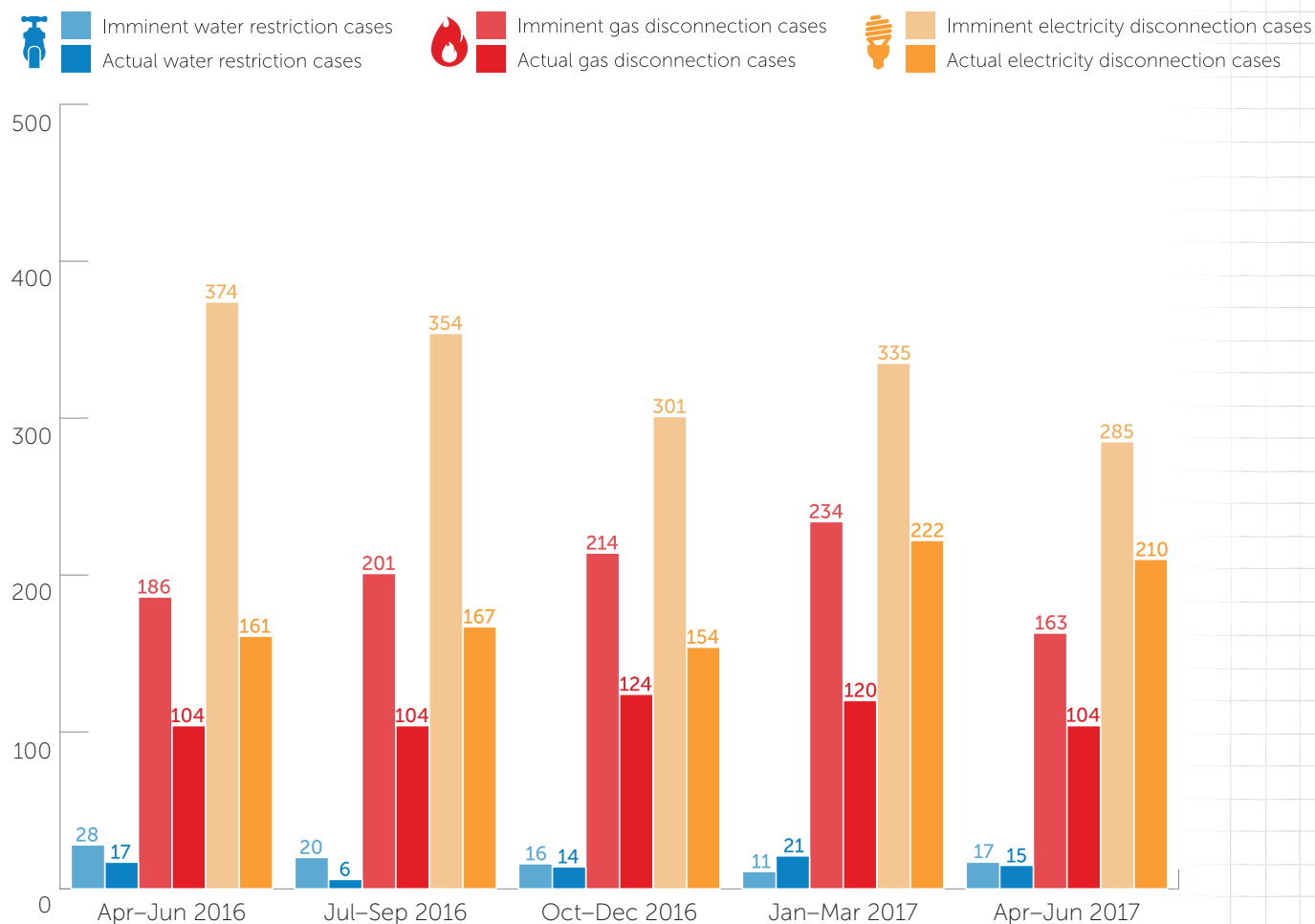
During our Investigation, Ms L's gas usage dropped a little. On this basis, the retailer agreed to offer a plan of \$120 a fortnight for the gas. Ms L accepted this and the third electricity payment plan option of \$84 a fortnight through the retailer's hardship program. She also undertook to continue her fortnightly payments of \$220 (\$110 for electricity and \$110 for gas).

Ms L was satisfied with this outcome and her complaint was closed on this basis.

Ms L didn't believe  
an energy audit was  
required and wouldn't  
agree to one.

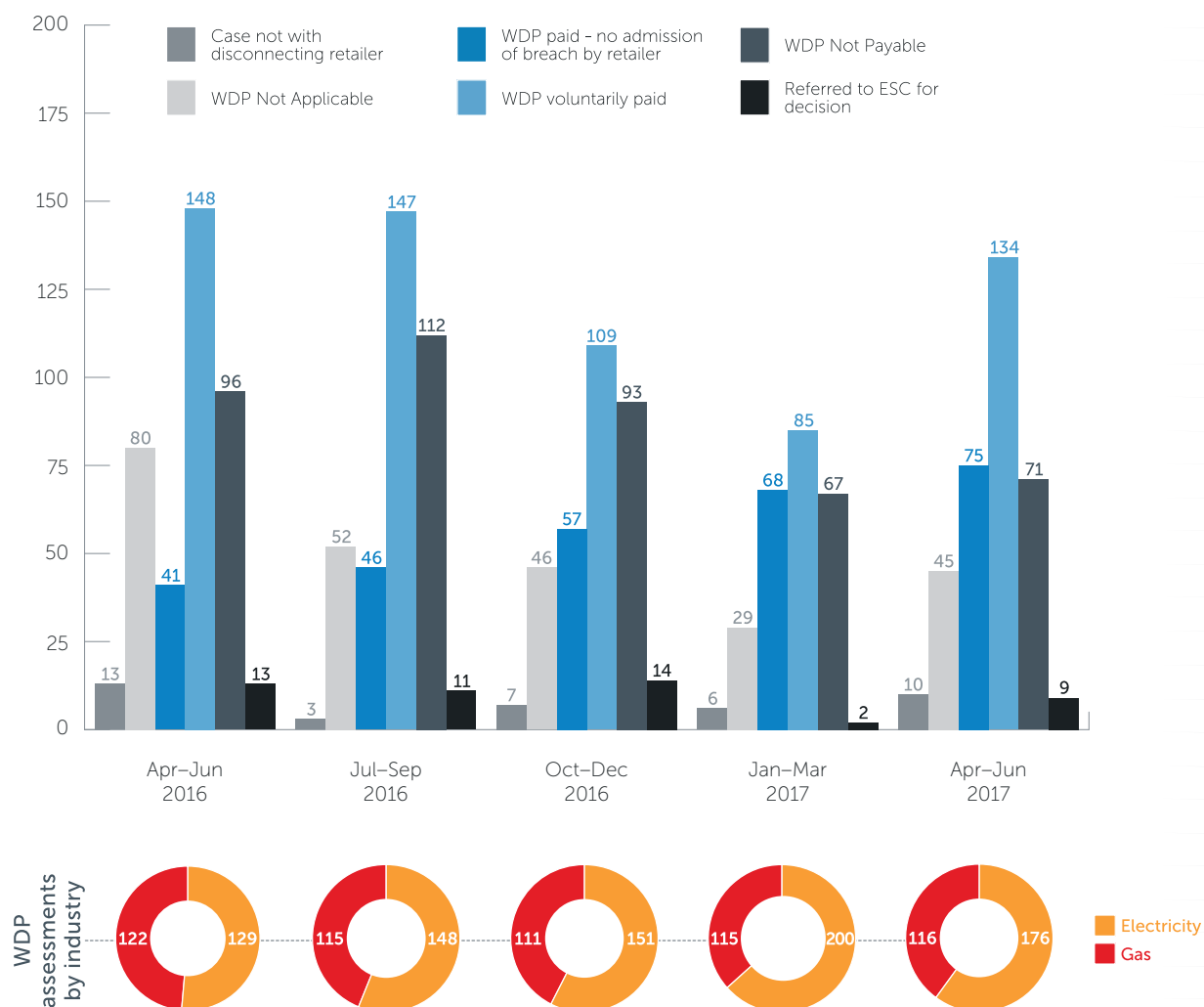
FIGURE 3

Credit-related disconnection and restriction cases



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

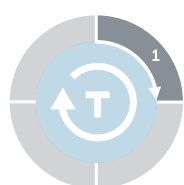
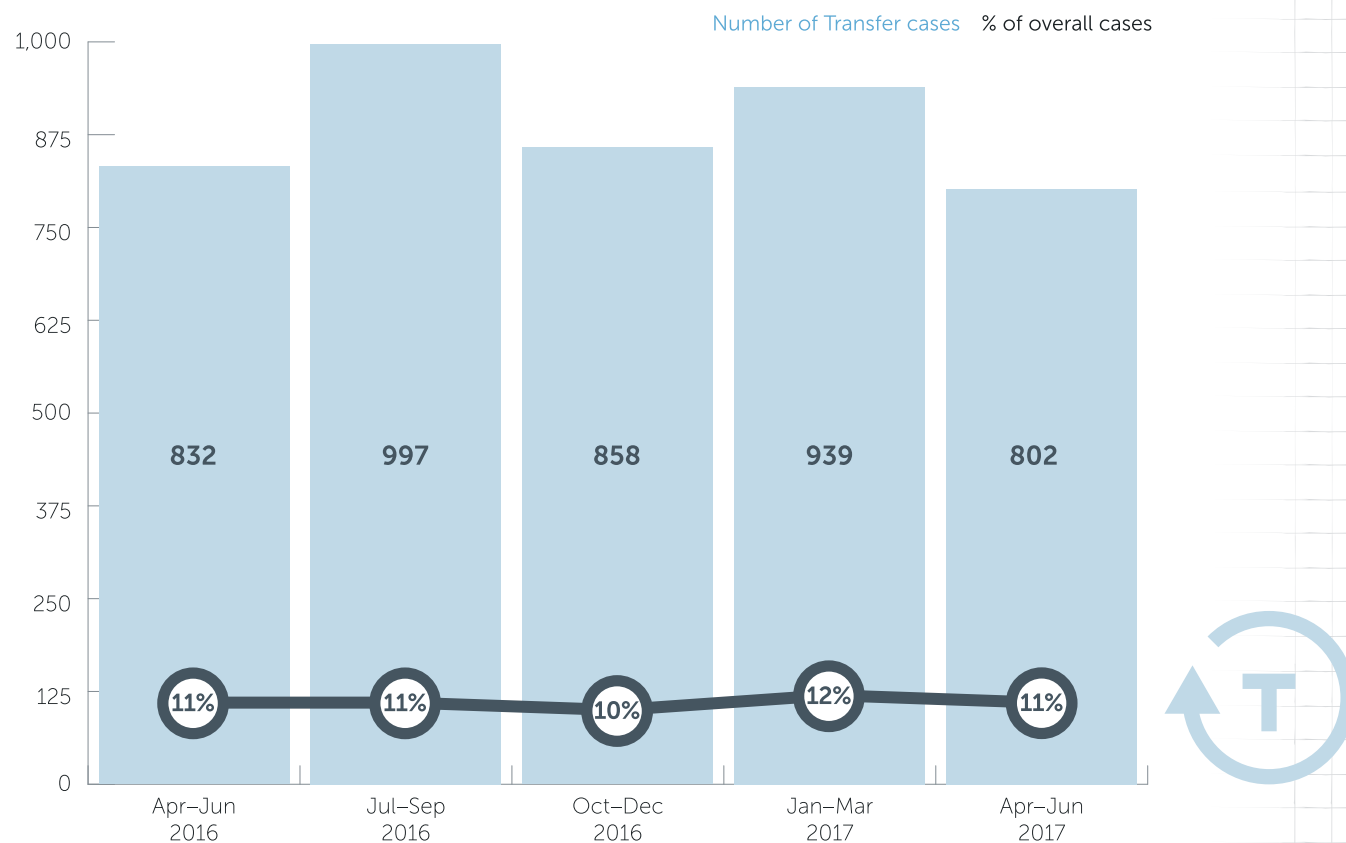
**FIGURE 4**  
**WDP outcomes**



# TRANSFER

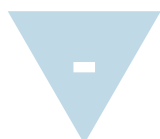
FIGURE 5

Transfer cases

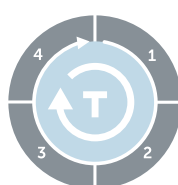


COMPARED TO  
LAST QUARTER

**TRANSFER CASES**

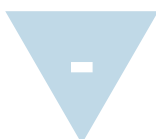


**15%**



COMPARED TO  
THIS TIME LAST YEAR

**TRANSFER CASES**



**4%**



## Transfer Case Study: Site address and meter confusion

*Transfer delays; site visit; retailer and distributor responsibilities; value of a site visit*

**Case number:** 2017/1776

Ms W, a local council representative, complained to EWOV about an electricity transfer delay. She said a council sports pavilion had been demolished in 2015 and rebuilt in July 2016. Since then, despite her efforts and those of the builder and the electrician, neither the correct billing address for the pavilion nor the National Metering Identifier (NMI) could be obtained. She was concerned that this was delaying the setting up of a billing account for the property.

When Ms W rang EWOV in mid-January 2017, we registered the complaint as an Assisted Referral and facilitated by a higher-level contact within the energy retailer. Ten days later, Ms W recontacted us requesting an Investigation. She was dissatisfied at being told the retailer was waiting on information from the local electricity distributor, and didn't know when that would be received.

Initially, the electricity retailer advised EWOV that it wasn't the financially responsible retailer for the site. It said it would need to confirm the meter number and NMI, so it could update its records and bill the account. It also requested a photo of the meter. Our check of the National Market Settlements and Transfers System (MSATS) database also showed a different retailer as responsible for the NMI at the site.

At this point, we suggested a meeting onsite with distributor and retailer as the easiest way to confirm all details correctly. Our onsite visit revealed that the meter at the property wasn't the same as the meter listed in the national database. We also found that the meter (a manually read interval meter) hadn't been configured correctly to record solar usage/exporting.

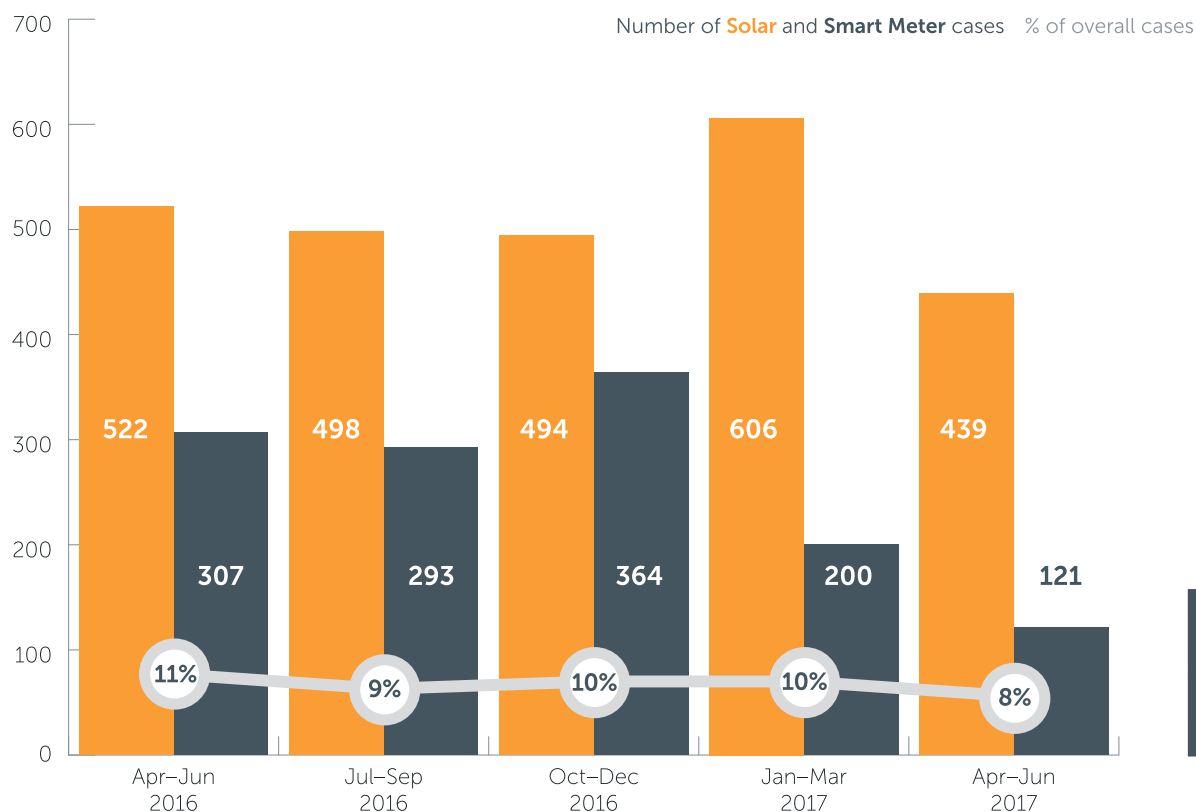
The retailer's further checking found that it was in fact the financially responsible retailer and had been since October 2016. It advised that the meter was now correctly listed in the national database and an account had been set up for the council. It asked that Ms W contact its new connections team to arrange paperwork for the meter to be configured for solar. Ms W was satisfied with this outcome and the complaint was closed on this basis.

**The retailer's further checking found that it was in fact the financially responsible retailer and had been since October 2016.**

# SOLAR AND SMART METERS

FIGURE 6

Solar and Smart Meter cases



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



**31%**



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



**32%**

## Trends

Solar and Smart Meter cases (combined) made up 8% of all EWOV cases in the April to June 2017 quarter. This was down from 10% in the January to March 2017 quarter, and down from 11% in the April to June 2016 quarter.

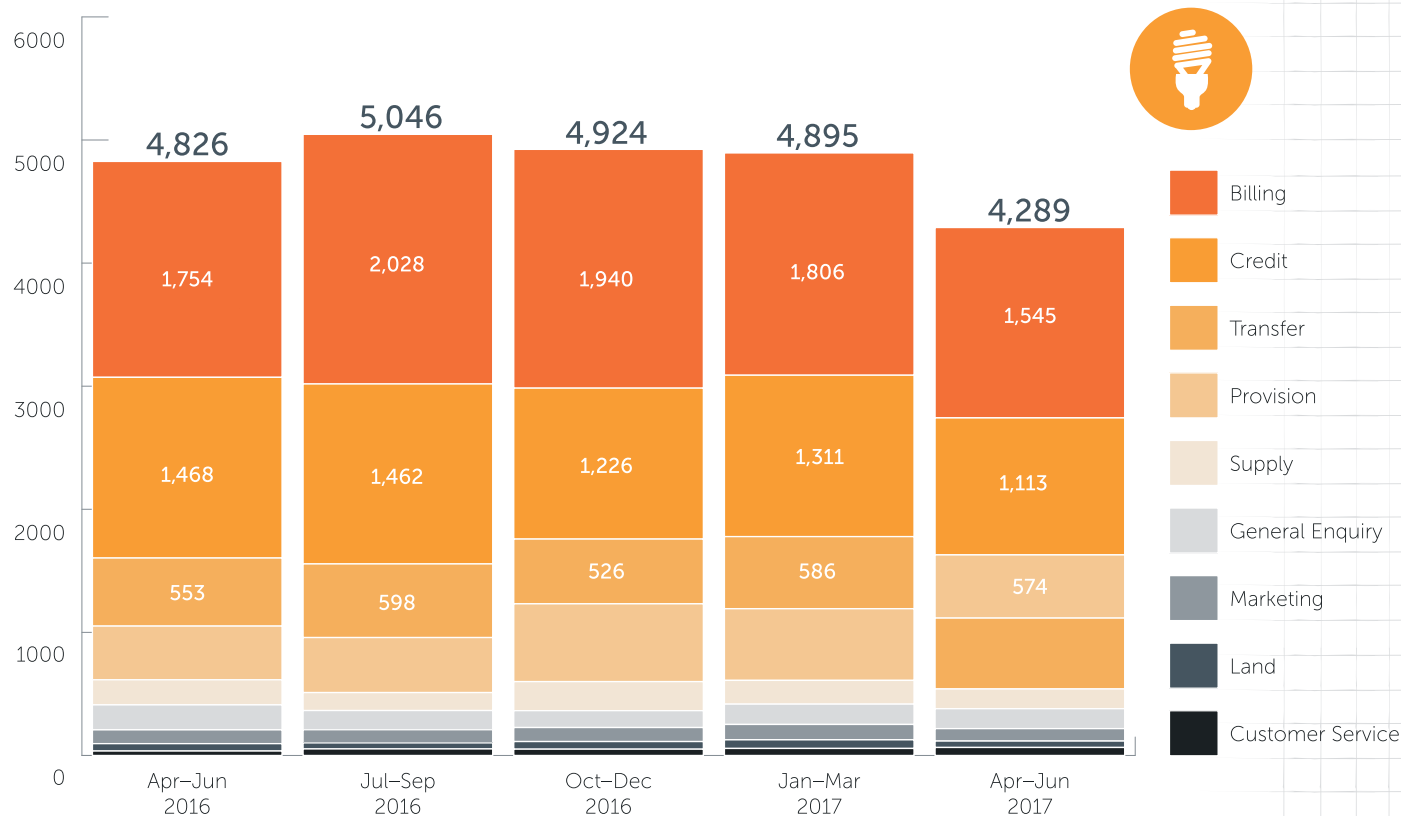
Solar cases were down 28% compared to those for the January to March 2017 quarter and down 16% against the April to June 2016 quarter. The main reason was a 35% fall in solar tariff cases following the closure of the Standard Feed-in Tariff (SFiT) and the Transitional Feed-in Tariff (TFiT) at the end of 2016.

Smart Meter cases continued to fall — down 40% against the January to March 2017 quarter and down 61% against the April to June 2016 quarter. The most common issues were existing connections, high bills, backbills and bill formats.

# ELECTRICITY

FIGURE 7

Electricity cases



COMPARED TO  
LAST QUARTER

**ELECTRICITY  
CASES**

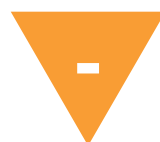


**12%**



COMPARED TO  
THIS TIME LAST YEAR

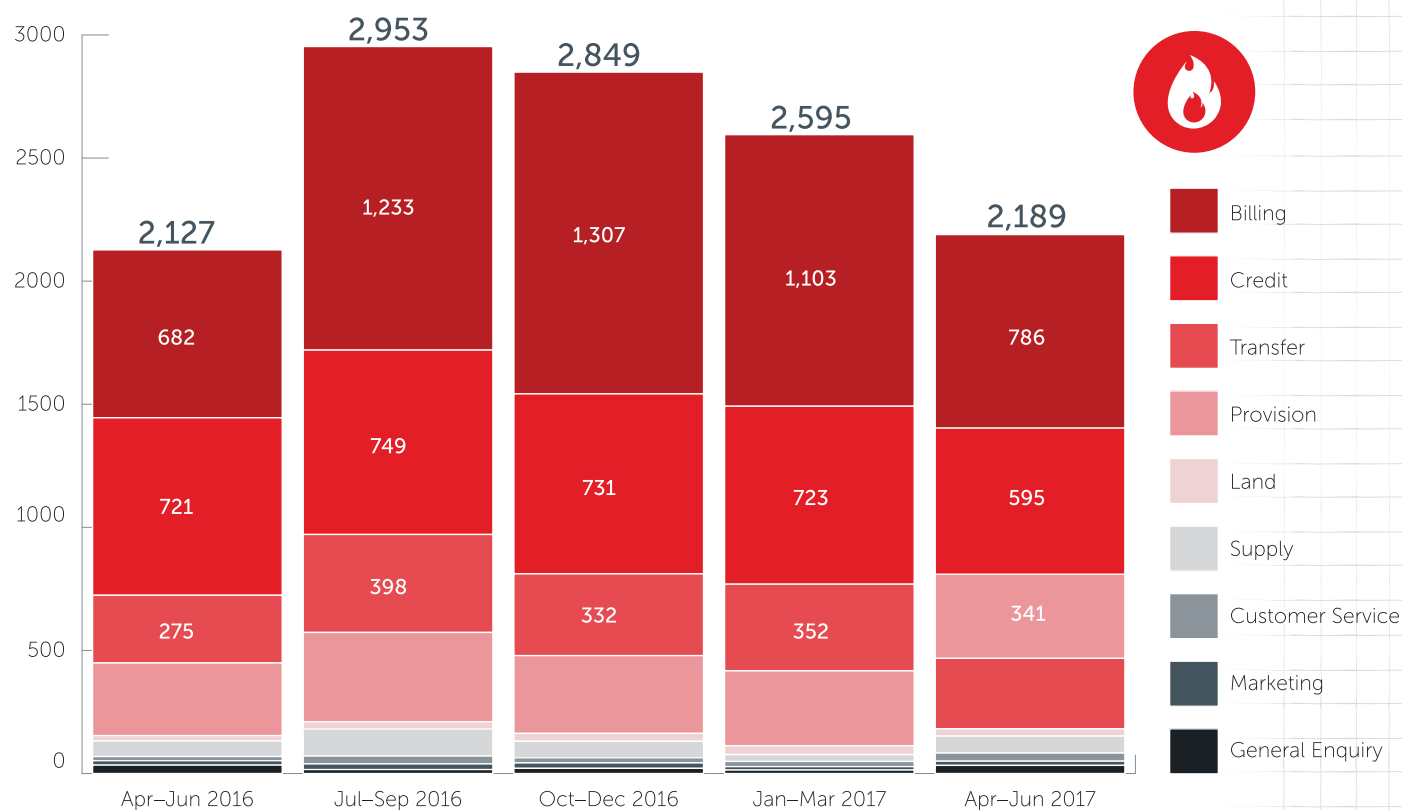
**ELECTRICITY  
CASES**



**11%**

# GAS

FIGURE 8  
Gas cases



COMPARED TO  
LAST QUARTER  
**GAS CASES**



**16%**



COMPARED TO  
THIS TIME LAST YEAR  
**GAS CASES**

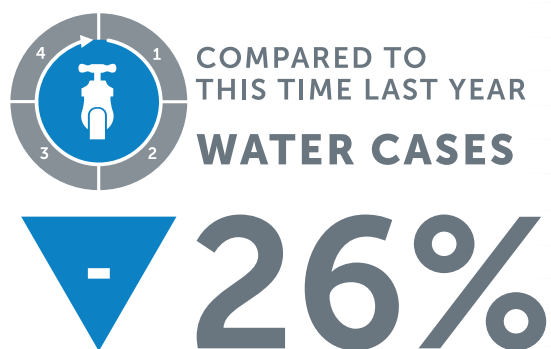
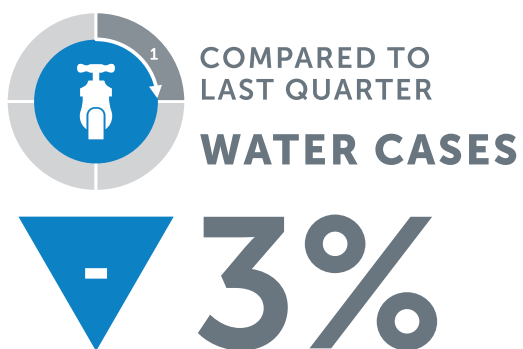
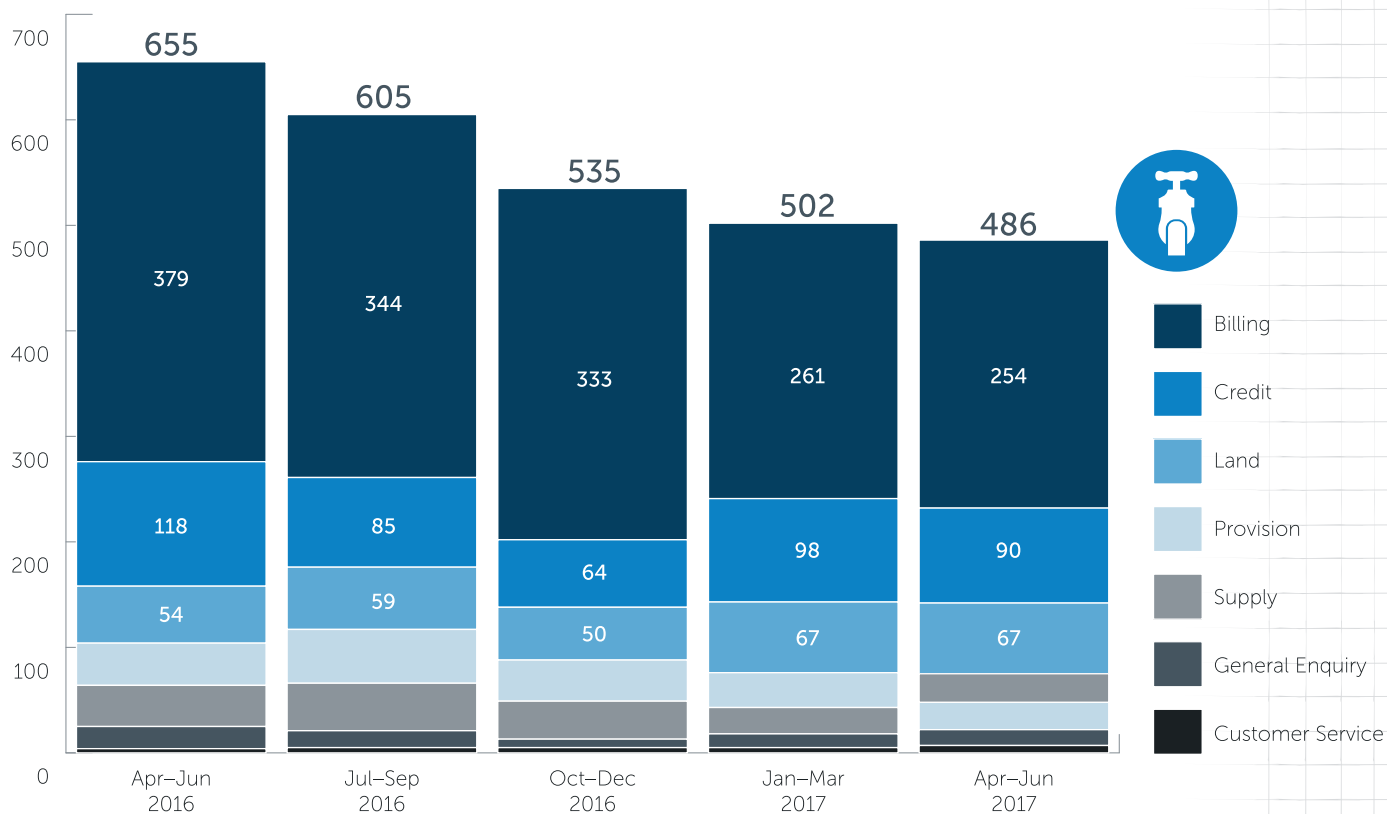


**3%**

# WATER

FIGURE 9

Water cases



# SYSTEMIC ISSUES

## Summary of systemic issue investigations opened and closed

April to June 2017

	Energy	Water	LPG
Open/Under Investigation	9	0	0
Closed	8	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

April to June 2017

### *Missing 'pay-by' date leads to disconnections*

Through EWOV's case handling, we identified that a 'pay-by' date was missing from some bills sent by one energy retailer. As a consequence, the billing proceeded to disconnection notices and actual disconnection. The retailer advised that 495 customers had been affected. It reported the issue to the Essential Services Commission (ESC), and was working with the ESC on an appropriate remediation plan for the customers affected. SI/2015/38

### *Discounts marketed generally, but not available to all gas customers*

EWOV's case handling revealed that a third-party marketer was offering discounts that weren't available to all customers. The customers who contacted EWOV believed this was misleading. The energy retailer advised that it had sent updated rates information to its third-party rate comparator companies (including the third-party marketer). This would ensure that customers in non-contestable gas regions were not marketed contracts, when the retailer can't win the billing rights or doesn't otherwise have a commercial arrangement in place. It said the third-party marketer's website had been updated to remove reference to gas offers for customers who live in non-contestable areas. SI/2016/12

### *Billing display issues*

Two cases to EWOV revealed potential issues with a retailer's billing system. In one case, where the customer signed up to a new contract with the retailer, the contract discount appeared on the bills as a "#" symbol. In another case, the word 'plan' appeared on the customer's bill, even though the customer was on a standard retail contract. The retailer said it became aware of the issue in 2014. It advised that bill updates in the next three months would address the display issues. It said that no customers were affected financially. SI/2016/23

### *Customers on payment plans didn't receive pay-on-time discounts*

Our case handling revealed that an issue with an energy retailer's billing system resulted in a small number of customers on payment plans not receiving some of their pay-on-time discounts. The issue was linked to pro-rata billing periods. The retailer said 2,728 customers were affected (2,288 active and 440 inactive). It explained that the error came about when the 'invoice posting date' and the 'bill-smoothing due date' were the same. It said it had implemented a billing system fix in November 2016 and had refunded overcharged active customers in accordance with the Energy Retail Code. It also said it was trying to contact affected inactive customers. SI/2016/57

### ***12 days to pay rather than 13***

Through our case handling, we found that a standard retail contract customer had received bills payable within 12 business days, rather than the 13 business days required by clause 26(1) of the Energy Retail Code. The energy retailer had reported the issue to the ESC, and was working with the ESC on an appropriate remediation plan for the customers affected. SI/2016/67

### ***Generic meter numbers on bills***

Through our case handling, we identified an instance where a Dear Occupier bill listed what appeared to be a generic meter number that didn't match the customer's actual meter number. The energy retailer confirmed an issue that affected 74,955 residential and business customers across Victoria. It said a billing system fix implemented in April 2017 had resolved the problem. It said it had reported the issue to the ESC in its six-monthly compliance report. SI/2017/6

### ***Disconnections after no due date on reminder notices***

Our case handling highlighted that one energy retailer's reminder notices didn't contain a due date, as required by clause 109(2)(b) of the Energy Retail Code. The retailer confirmed the problem affected some notices issued in December 2016. It said a system fix was implemented in February 2017. The retailer reported the issue to the ESC and was working with the ESC on an appropriate remediation plan for the customers affected. SI/2017/15

### ***Old de-energisation error leads to loss of supply***

Through our case handling we identified that a customer had lost supply due to an old de-energisation service order. The electricity distributor confirmed the issue had affected 137 customers. It said the unplanned outage event was triggered by a one-off fault affecting its Network Management System. The problem had been resolved and steps taken to prevent it happening again. It said no customers reported appliance damage or loss as a result of the outage. Affected customers were included in the distributor's unplanned interruption Guaranteed Service Level (GSL) payment calculation. SI/2017/18

# PUBLIC SUBMISSIONS MADE BY EWOV

## **Review of regulatory arrangements for embedded networks**

### ***Australian Energy Market Commission (AEMC)***

Our submission on this AEMC consultation paper drew on EWOV's previous comments on related topics and issues in other consultations. Most of our comments focused on section 3.3 of the paper, around dispute resolution and consumer protections. We repeated EWOV's view that all energy customers, including those within embedded networks, should have access to free and independent dispute resolution. We also supplemented our response with case studies.

[EWOV's submission online](#)

[About this AEMC consultation](#)

## **Payment Difficulty Framework - New Draft Decision**

### ***Essential Services Commission (ESC)***

In EWOV's experience, the hardship support provided to customers is inconsistent across retailers. We welcomed the retailer minimum standards for this within the ESC's draft decision. We also highlighted some areas of the proposed framework that we believe could be made clearer — the phrase 'best endeavours to contact'; proposed incorporation of the Operating Procedure Compensation for Wrongful Disconnection; the 'steps' to offer Standard Assistance; the level of 'practical assistance' to help customers reduce energy use; the meaning of 'specific and timely advice'; the transition to the new framework of customers with high debt levels; and the reminder notice timeframe. We also made some observations on KPMG's preliminary analysis of the impact over time of the proposed framework on EWOV.

[EWOV's submission online](#)

[About this ESC consultation](#)

## **Inquiry into Retail Electricity Supply and Pricing (Issues Paper)**

### ***Australian Competition & Consumer Commission (ACCC)***

In responding to the ACCC's issues paper, we provided a general submission, drawing on our experience of handling customer complaints to outline impediments to consumer engagement in the electricity market in Victoria. Our submission addressed marketing and transfer cases received by EWOV; customer type; comparative websites and offers available; contract variations and discounts; bill content; and embedded networks. We also included case examples.

[EWOV's submission online](#)

[About this ACCC consultation](#)

## **Review of Victoria's Electricity Safety Network – Issues Paper**

### ***Department of Environment, Land, Water and Planning (DELWP)***

In EWOV's submission on this issues paper, we provided an analysis of cases EWOV has received which potentially concern an electricity safety issue, with a particular focus on cases in 2016.

[EWOV's submission online](#)

[About this DELWP consultation](#)

# GLOSSARY

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