



# Res ONLINE



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

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# THE OMBUDSMAN'S VIEW

## Bedding down EWOV's new jurisdiction

In this issue of *Res Online*, we report on the first three months of EWOV's expanded jurisdiction to embedded networks. So far EWOV has 92 new embedded network scheme participants in 327 sites across Victoria. This gives over 35,000 more customers access to EWOV's dispute resolution services.

It's early days, but the complaints lodged by embedded network customers generally reflect those EWOV receives from customers of licensed electricity retailers. For example, we received 124 embedded network cases from July to September, 76 of them about billing. We're also seeing a high level of customer dissatisfaction with how hard it is to take advantage of a market contract and/or switch retailer. We're drawing on EWOV's case experience in our discussions with the Essential Services Commission and policy makers, as they consider how to overcome these issues. [Our report on EWOV's first quarter of dealing with embedded network cases](#) includes two case studies, one residential and one business.

## Keeping a close eye on natural gas billing cases

After a 1% fall last year, natural gas billing cases are on the rise. Over the last quarter we've seen an overall increase of 109%. Within this, cases about high gas bills were up 306% and cases about billing errors were up 90%. A particularly cold winter may be one driver. Prices rises may be another. We'll continue to monitor and report on this trend.

## Other case studies in this issue

- [Higher than expected gas bill \(billing\)](#)
- [No hardship assistance offered before default listing \(credit\)](#)
- [Meter exchanged but gas couldn't be reconnected \(provision\)](#)

## 2018 Annual Report

We released EWOV's 2018 [Annual Report](#) on 16 October. We received 34,524 cases (up 8% from 2016-17) and issues about **billing**, **credit** and **provision** made up the 'top 5' issues of complaint:

- For the first year since 2012-13, high bill was the top issue overall. 87% of high bill cases were about energy. Electricity high bill cases were up 17% and gas high bill cases were up 28%. Water high bill cases fell 14%.
- Disconnection or restriction of supply for debt was the second most common issue. Cases were up 1% from 2016-17. 97% of cases about disconnection or restriction for debt were about energy.
- Debt collection/credit default listing was number three, with cases down 5% from 2016-17. 97% of cases about debt collection/credit default listing were about energy.
- New connection cases more than doubled (from 1,225 to 2,502) taking it to number four.
- Existing connection was number five, with cases up 9%.

[EWOV's 2018 Annual Report \(PDF\)](#)

[Media release \(PDF\)](#)

[2018 Annual Report online, including video summary and data visualisations](#)



**Cynthia Gebert**

Energy and Water Ombudsman (Victoria)



**Cynthia Gebert**

Energy and Water Ombudsman (Victoria)

If you have any feedback about *Res Online*, please contact Janine Rayner, EWOV's Communications and Policy Manager at: [janine.rayner@ewov.com.au](mailto:janine.rayner@ewov.com.au).

# THE BIG PICTURE

JULY - SEPTEMBER 2018

Compared to last quarter:

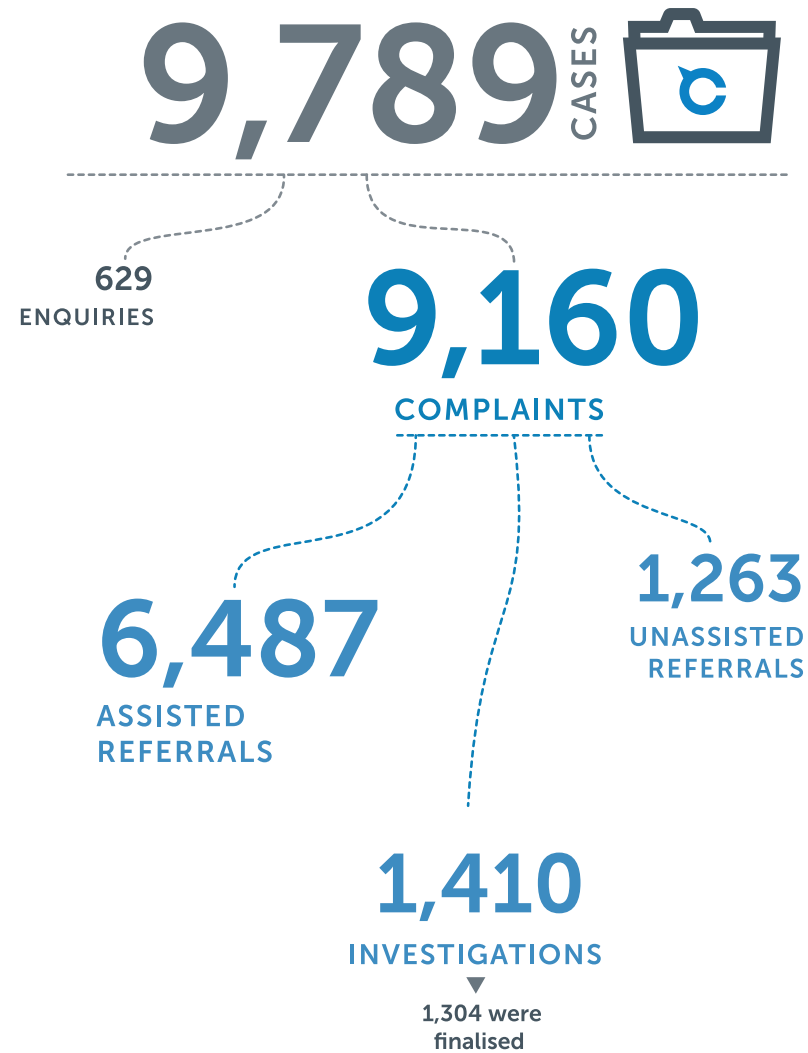
**CASES**  
▲ **13%**

**ENQUIRIES**  
▲ **19%**

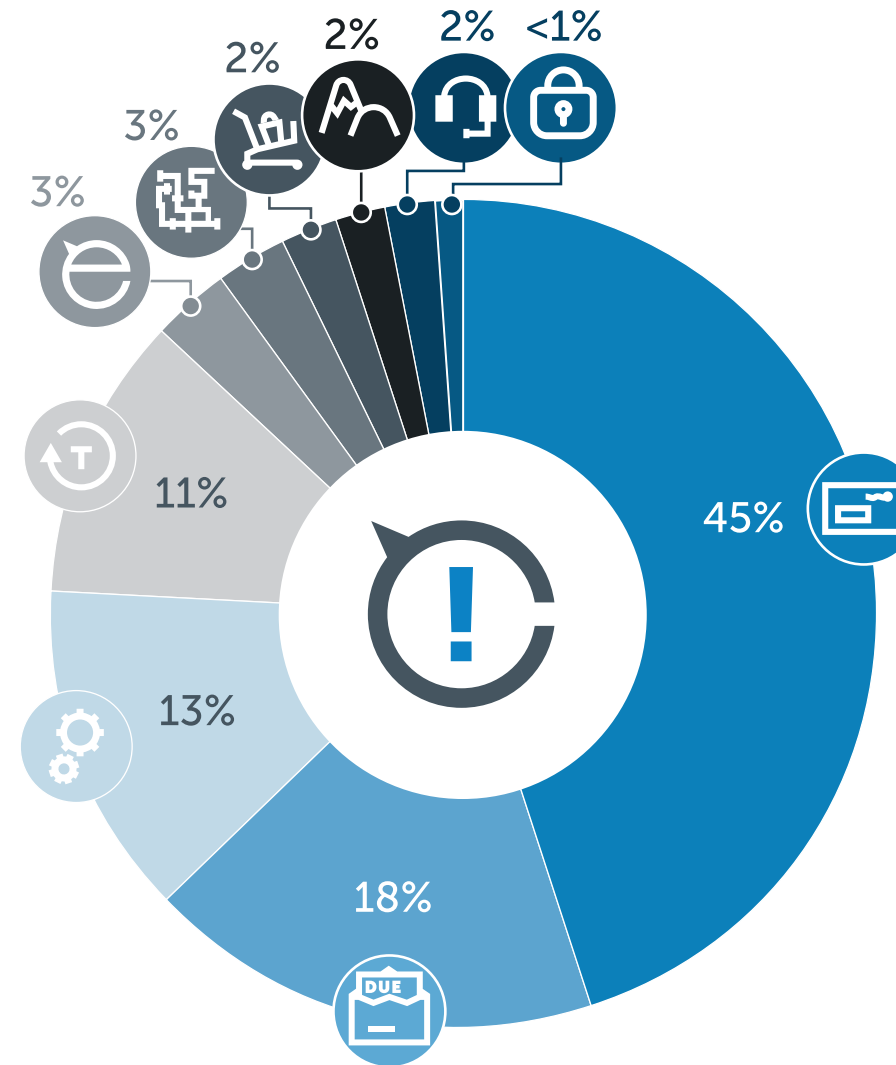
**UNASSISTED REFERRALS**  
▲ **9%**

**ASSISTED REFERRALS**  
▲ **15%**

**INVESTIGATIONS**  
▲ **3%**



The issues customers complained about



Compared to last quarter:

**BILLING**  
4,404 cases  
▲ **51%**

**CREDIT**  
1,810 cases  
▼ **9%**

**PROVISION**  
1,259 cases  
▼ **28%**

**TRANSFER**  
1,113 cases  
▲ **14%**

**GENERAL ENQUIRY**  
308 cases  
▲ **21%**

**SUPPLY**  
306 cases  
▼ **<1%**

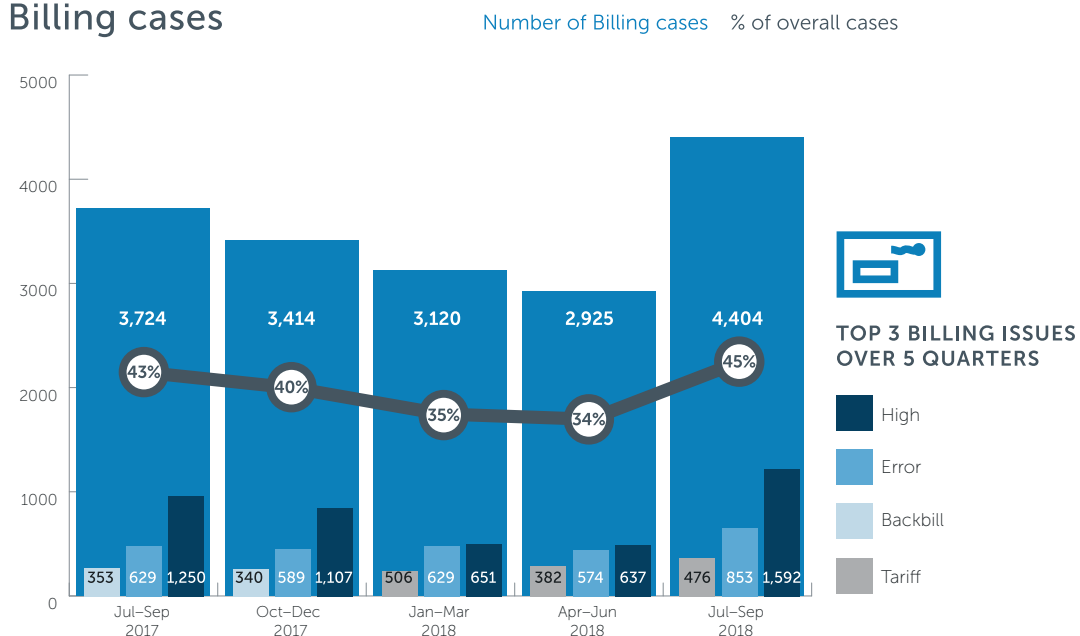
**MARKETING**  
221 cases  
▲ **50%**

**LAND**  
178 cases  
▼ **16%**

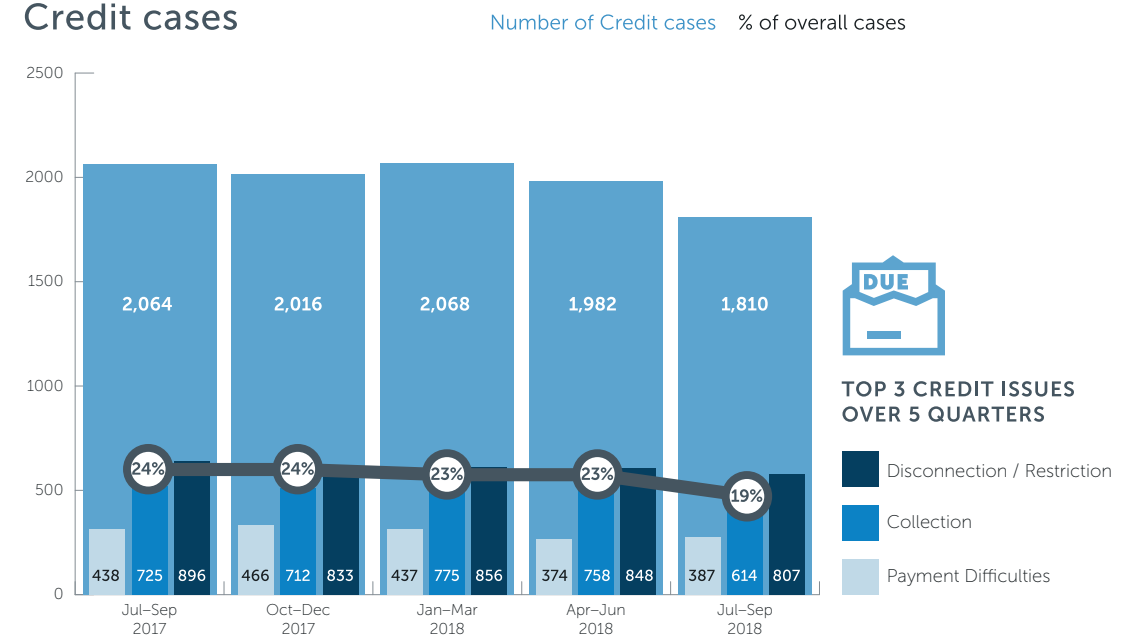
**CUSTOMER SERVICE**  
148 cases  
▲ **20%**

**PRIVACY\***  
42 cases  
▲ **75%**

## Billing cases



## Credit cases



\* Privacy is now a standalone high-level issues category. The main privacy sub-issues are 'details released', 'details requested by provider', 'details obtained without consent' and 'disclosure refused by provider'.

# ISSUES WATCH:

## Embedded network cases and issues

### Free and independent dispute resolution is a big step forward, but ...

Since July 2018, Victorian electricity customers in embedded networks have been able to lodge complaints with EWOV. Access to EWOV is a big step forward for tens of thousands of people living in retirement villages, caravan parks and apartment buildings, and for small businesses operating in shopping centres.

Despite the positive changes, embedded network customers tell us they're frustrated by the complexities of getting different offers and switching retailer — to the point that they just give up.

### In the first three months of EWOV's new jurisdiction, we received 124 embedded network cases.

**Billing** was the top issue, raised in 76 cases:

- high (26 cases)
- tariff (21 cases)
- fees and charges (9 cases)
- backbill (8 cases)

**Transfer** (the process of switching electricity retailer) was raised in 15 cases. 14 of these were about an objection raised when the customer tried to switch, usually related to metering.

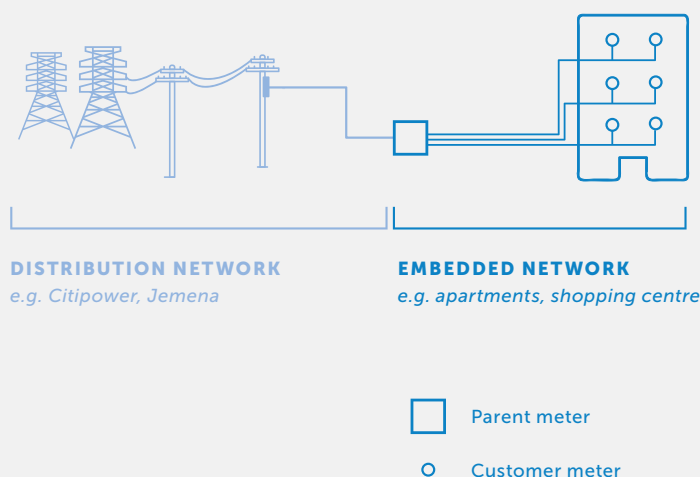
### Embedded network customers have the right to switch retailer but, in practice, there are significant barriers.

For many embedded network customers, going 'on-market' — to take advantage of a market contract and/or switch retailer — is a highly complex process. Some customers have told us they tried to switch, but couldn't find any retailers that would make contracts available.

The switching process also relies heavily on action being taken by the embedded network manager, and on specific metering arrangements. The customer's preferred electricity retailer must ask the embedded network manager to arrange for a National Meter Identifier (NMI) to be assigned to the customer's 'child' meter (under the property's 'parent' meter). Once the embedded network manager has done this, the NMI standing data needs to be updated in the Market Transfer and Settlement Solution (MSATS). Until the NMI standing data is updated and an MSATS tariff code is applied, the customer is unlikely to get an offer from their preferred retailer.

If either the embedded network manager or the preferred retailer doesn't do its part properly, the customer may find themselves in a frustrating and unsatisfactory loop of uncompleted actions. The situation is even more complicated where a 'child' meter doesn't meet the standards necessary for the customer to go 'on-market' and requires an upgrade, at the customer's cost. EWOV is in discussions with the Essential Services Commission and policy makers about the regulatory and policy settings needed to overcome these issues.

Help for customers: [EWOV's Switching for customers in embedded networks](#) fact sheet.



## There are hundreds of embedded networks in Victoria, some of them quite small.

An embedded network is a private electricity network, which supplies homes or businesses within a specific area. It's a common arrangement in shopping centres, retirement villages, apartment buildings and caravan parks. The embedded network is connected to the wider electricity network. Usually, the embedded network entity buys electricity in bulk from this connection, and sells it on to customers inside the embedded network.

Sometimes customers don't know they're in an embedded network. Many embedded networks use an agent to send bills and provide customer service. Some of the larger agents are WinConnect, Energy On, Active Utilities, ENSA, Energy Intelligence, Benergy, iGENO and Network Energy Services.

We advise customers who aren't sure whether they're in an embedded network to check with the body corporate, the operator of the caravan park or retirement village, or the company named on their electricity bill. Customers can also check the Essential Services Commission's [public register](#).

## Already, over 35,000 more electricity customers have access to EWOV.

EWOV now has 92 embedded network scheme participants (completed applications).

These cover 327 embedded network sites across Victoria:

- 8 retirement villages/residential villages with 1,216 customers
- 251 apartment buildings/owners' corporation buildings with 28,791 customers
- 68 caravan parks with 5,040 customers.

As more completed applications to join EWOV are processed, the number of sites will increase. We anticipate that up to 100,000 Victorians may be affected.

More information on EWOV's website:

- EWOV's [Embedded Networks](#) fact sheet
- List of [embedded network EWOV scheme participants](#)



## Case study 1: The experience of a residential customer

**Case number:** 2017/23061

Having moved into her apartment, Ms G found it was serviced by an embedded electricity network. Ms G was used to having choice of electricity retailer. She was dissatisfied with the offer from the embedded network manager (in this case an electricity retailer), which didn't include off-peak rates. She was seeking a bundled offer, or one with pay-on-time or other discounts. She didn't understand why this wasn't being offered and she couldn't work out how to switch to another retailer.

Frustrated by the situation she found herself in, Ms G complained to EWOV. We registered her complaint as an Assisted Referral and facilitated contact with her by a higher-level contact within the electricity retailer. Ms G returned to us dissatisfied that the retailer had said it couldn't alter the property's existing electricity plan. We opened an Investigation.

Responding to EWOV's investigation, the retailer confirmed its advice to Ms G that it couldn't provide different tariffs (or a peak/off-peak split) and a discount, because the property was within an embedded network. It said that, if Ms G owned the property, she may be able to start the process to remove the property from the embedded network.

We reviewed the contract, contact notes, meter data, account reconciliation, billing and usage recorded for the property. We also reviewed the relevant laws and codes for embedded networks.

Ms G confirmed that she wished to transfer out of the embedded network. We checked with the Australian Energy Market Commission to confirm the process for getting an embedded network customer 'on-market'.

After considerable discussion with a metering co-ordinator, a new retailer and the embedded network manager, the meter at Ms G's property was assigned a National Metering Identifier (NMI). The NMI was then updated on the national distribution database (MSATS) to include the meter and network tariff details.

During this process Ms G realised she would receive two bills if she proceeded with a transfer to another retailer — one bill from the embedded network manager (network charges) and another from the new retailer (usage charges).

As a result, and even though she remained dissatisfied with the situation and her limited options, Ms G decided to stop the process and return to the embedded network.

**Ms G confirmed that she wished to transfer out of the embedded network.**



## Case study 2: The experience of a business customer

**Case number:** 2018/13373

Mr P, a business customer, complained that the embedded network manager (an electricity retailer) wouldn't honour the rates he'd been offered.

We registered Mr P's complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the electricity retailer. Mr P returned to EWOV still dissatisfied with the retailer's response. We opened an Investigation.

We received and reviewed information about the contract, tariffs and pricing, and contacts between Mr P and the retailer. Responding to our Investigation, the retailer advised that the letter Mr P received from the developer/owners corporation was intended for residential occupants only. There was a different letter and contract offer for business occupants.

We assisted Mr P with information on the transfer process and his switching options. Essentially, he could move from the retailer's embedded network business plan to one of its 'on-market' business plans. As part of this process, the retailer would raise a request to have an NMI allocated to his business premises that he could use for a future switch. Or, he could accept an 'on-market' business plan with a different retailer, specifying that he wanted to exercise his 'power of choice' and transfer out of the embedded network. The new retailer would need to raise a 'business to business' request to the first retailer through MSATS to organise a contestable NMI, to bring the meter for Mr P's business back 'on-market' (an 'allocate NMI' service order).

The retailer confirmed this advice, adding that should Mr P switch, it would still need to bill him for supply charges, as it is the embedded network manager. His usage charges would be billed separately by the new retailer. To recognise the inconvenience caused by the contract confusion, it provided Mr P with \$633 in customer service credits.

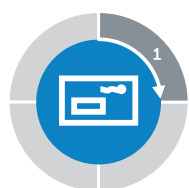
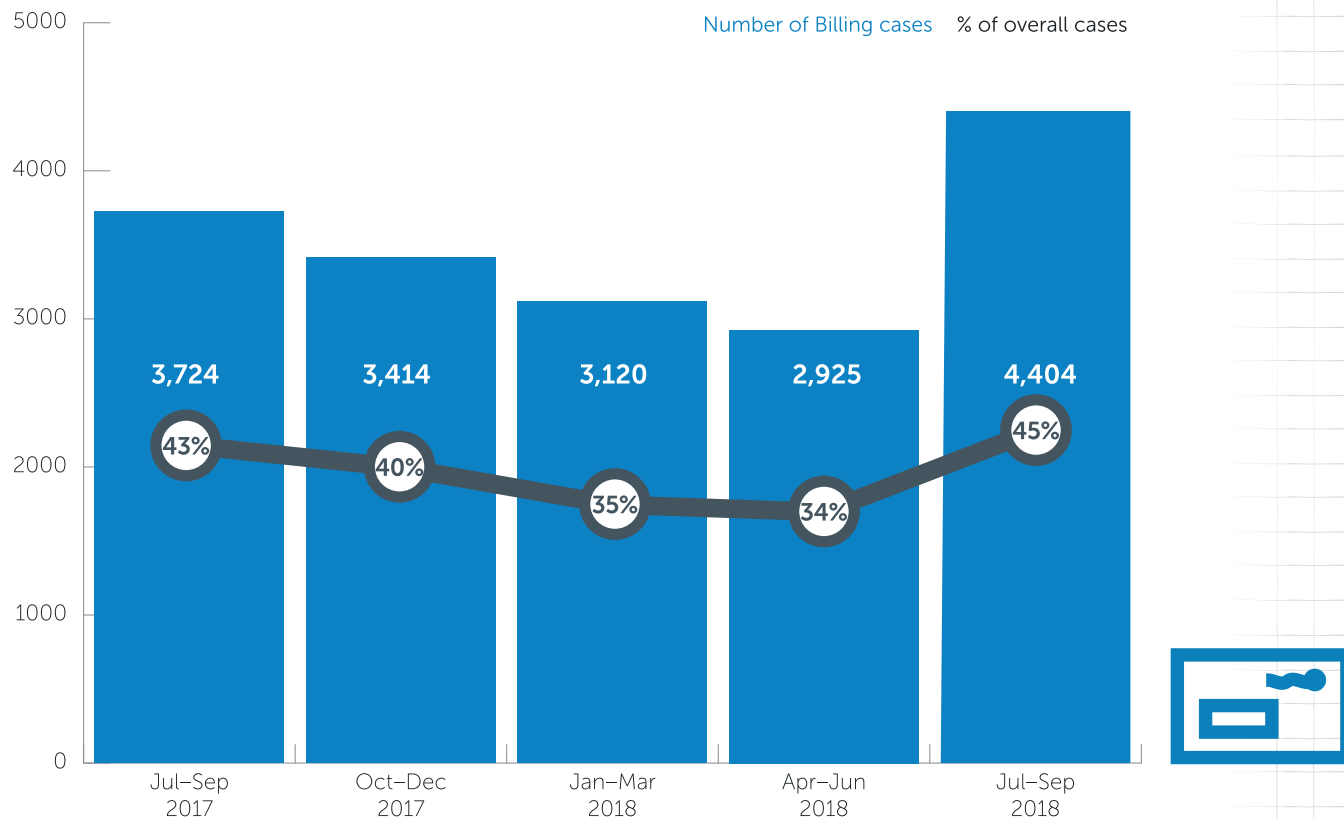
Mr P accepted this outcome. The complaint was closed.

**Mr P returned to EWOV still dissatisfied with the retailer's response. We opened an Investigation.**



# BILLING

FIGURE 1  
Billing cases

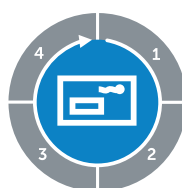


COMPARED TO  
LAST QUARTER

**BILLING CASES**



**51%**



COMPARED TO  
THIS TIME LAST YEAR

**BILLING CASES**



**18%**

## On issues watch: Gas billing cases

EWOV's July to September 2018 cases show quarter on quarter increases across the top natural gas billing issues categories. Overall in the July to September 2018 quarter, natural gas billing cases were up 109% to 1,682 (from 804 in the April to June 2018 quarter).

Breaking these gas billing increases down further:

- High bill cases were up 306% from 181 to 734
- Billing error cases were up 90% from 174 to 330
- Billing estimation cases were up 50% from 78 to 117
- Backbill cases were up 18% from 90 to 106
- Billing concession cases were up 118% from 40 to 87.

We're unsure what's driven the most recent jump in complaints — possibly market-wide constraints pushing up gas prices; possibly the flow-on effect of what the Bureau of Meteorology reported as Victoria's coldest start to winter since June 1982, followed by a particularly cold September. We'll report again in the next *Res Online*.



### Billing Case Study: Higher than expected gas bill

*Residential customer; higher usage; higher rates*

**Case number:** 2018/17152

Mr V complained about a \$873.71 gas bill for the period May 2018 to June 2018. He was also concerned that the usage recorded on the bill was 30,000mJ. Mr V said his usage was generally around 5,000mJ, and there had been no change to his living arrangements.

We registered Mr V's complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the gas retailer. Mr V remained dissatisfied and returned to EWOV. We opened an Investigation and Mr V made a payment towards the disputed bill. Responding to our Investigation, the gas retailer said it had billed Mr V on an actual meter reading obtained by his local gas distributor. In addition, at its request, the distributor had taken a special check reading. This reading verified the original meter reading data.

As part of our Investigation, we reviewed Mr V's usage for 2018 against meter data provided by the distributor. This confirmed his usage was in line with historic data. Based on our review of the bills and meter readings, we concluded that the high bill Mr V was disputing was due to him using more gas moving into the 2018 winter period, at higher rates than he was on in 2017.

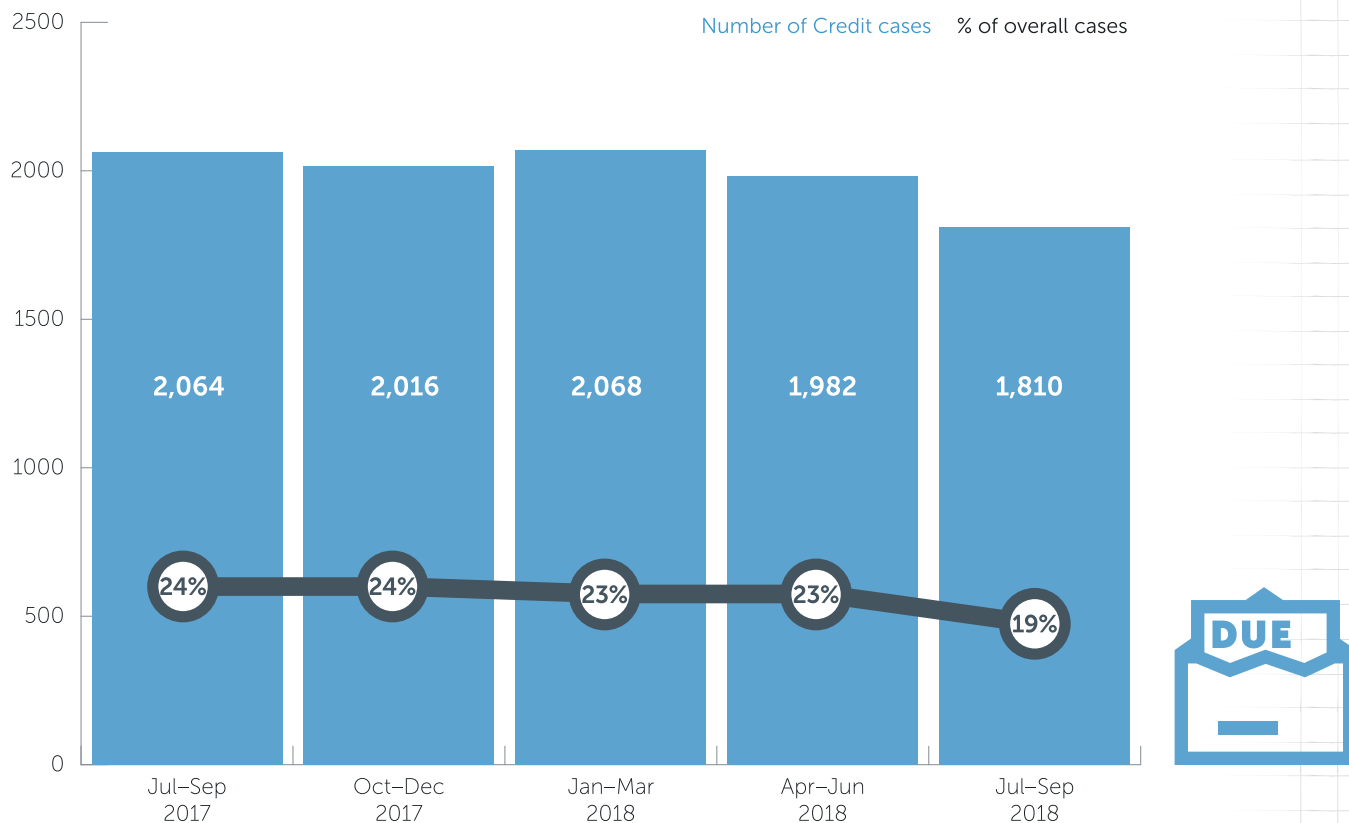
The retailer offered a credit of \$100, reducing Mr V's account balance from \$873.71 to \$773.71. It said it could also offer him a payment extension or payment plan, and assistance with a Utility Relief grant should that be necessary.

Mr V was satisfied with the outcome. The complaint was closed.

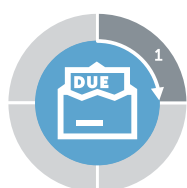
" ... the high bill Mr V was disputing was due to him using more gas moving into the 2018 winter period, at higher rates than he was on in 2017."

# CREDIT

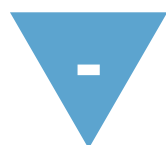
FIGURE 2  
Credit cases



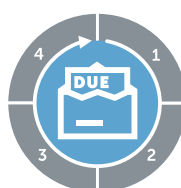
**Note:** The disconnection data in this report does not include LPG Deliveries Stopped cases.



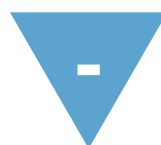
COMPARED TO  
LAST QUARTER  
**CREDIT CASES**



**9%**



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



**12%**



## Credit Case Study: No hardship assistance offered before default listing

*Information provision; responsibility for listing and removing a default*

**Case numbers:** 2018/13727

Having applied for a home loan, Mr D learnt of a default listing against him for an electricity debt of \$217, which he'd since paid. He wanted the default listing removed as it was affecting his loan application.

We registered Mr D's complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the electricity retailer. Mr D returned to EWOV dissatisfied with the information provided by the retailer — that the debt status had been changed to paid, but the retailer couldn't remove the default because it wasn't in charge of it. We opened an Investigation.

In complaints about default listing, EWOV considers whether the listing complied with relevant regulatory obligations, and whether a refusal to remove it appears to be fair and reasonable given the circumstances. In this case, we considered the complaint in the context of the *Privacy (Credit Reporting) Code 2014*, the *Privacy Act* and advice provided by the Office of the Australian Information Commissioner.

We reviewed Mr D's credit file, contact notes and billing. It was clear that, in calls he'd made to the electricity retailer in September 2014, October 2014 and April 2015, Mr D had explained his personal and financial position. On this basis, he should have been referred to the retailer's hardship team for assistance. We assessed that had appropriate hardship assistance been provided by the retailer, the debt may have been settled with no need for a default listing. Our assessment was supported by the *Privacy (Credit Reporting) Code 2014* under which a credit provider may not default list a customer where the customer has made a hardship request which is being processed.

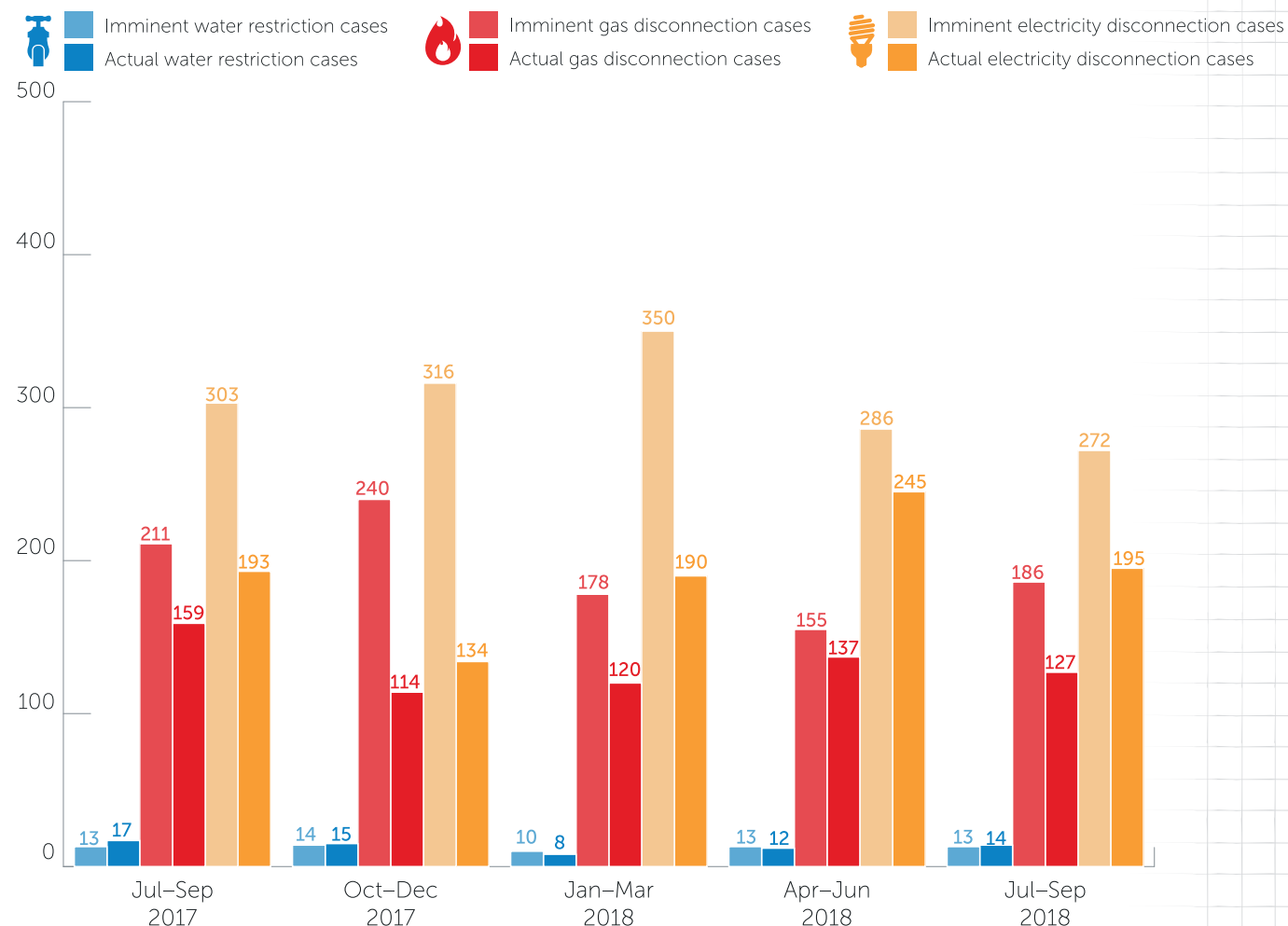
We checked with other electricity retailers about industry practice in situations of this type. In the two responses we received, the retailers advised that they would remove the listing — having not identified or assessed hardship, or offered Mr D assistance.

Mr D's retailer said it would arrange for the default listing to be removed within 10 business days. Mr D was satisfied with this outcome. The complaint was closed.

**"It was clear that ... Mr D had explained his personal and financial position."**

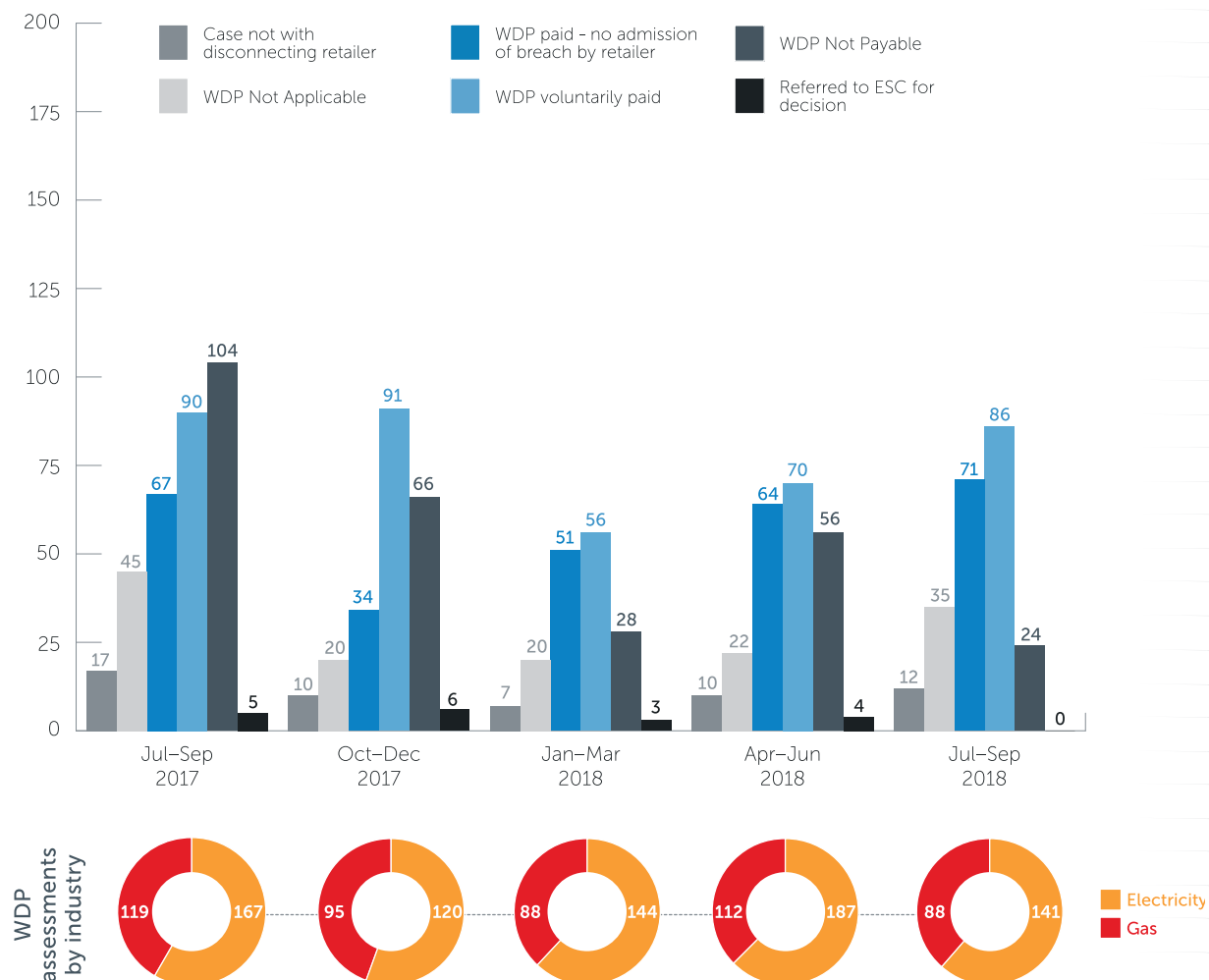
FIGURE 3

Credit-related disconnection and restriction cases



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

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

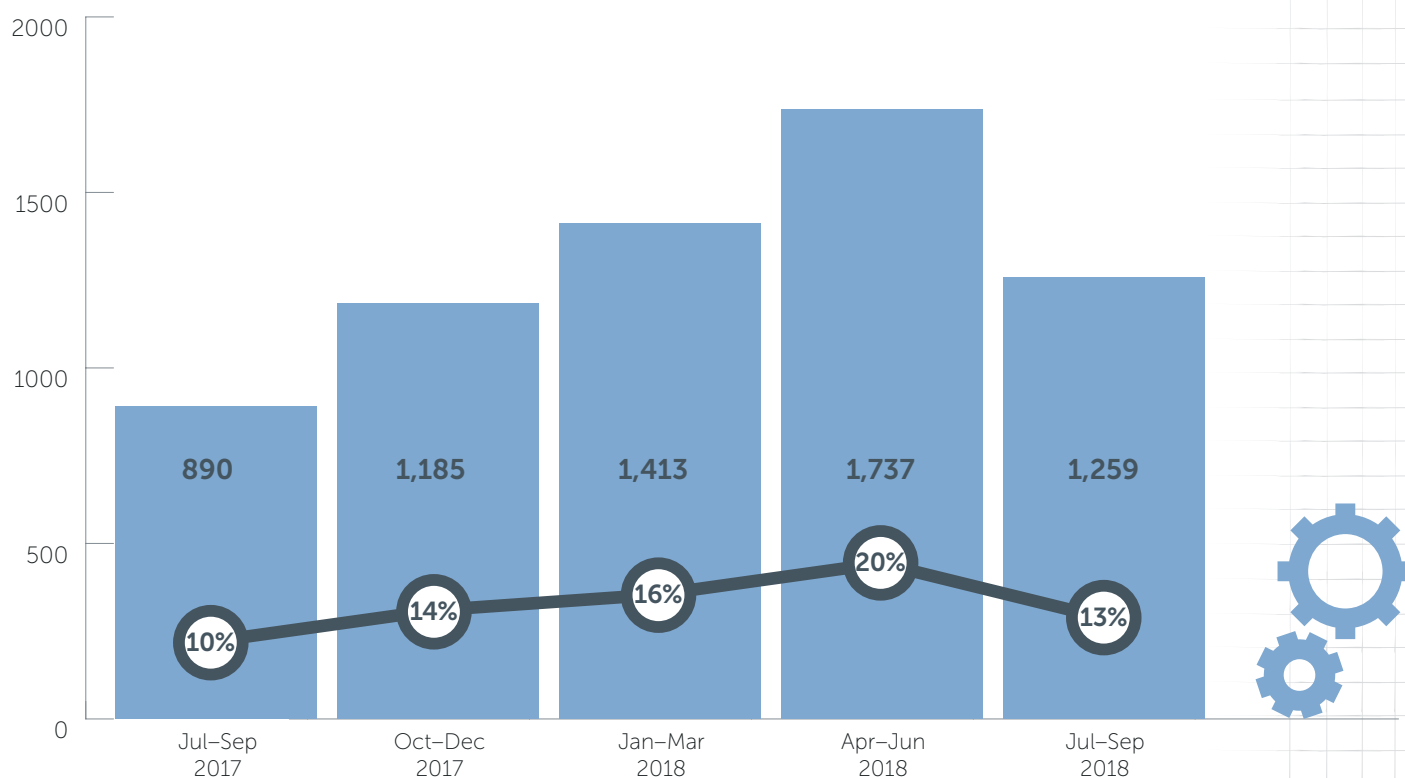


# PROVISION

FIGURE 5

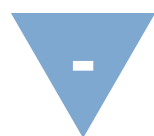
Provision cases

Number of Provision cases % of overall cases



COMPARED TO  
LAST QUARTER

**PROVISION CASES**



**28%**



COMPARED TO  
THIS TIME LAST YEAR

**PROVISION CASES**



**41%**



## Provision Case Study: Meter exchanged but gas couldn't be reconnected

*Home owner; access issues; disputed notice of works*

**Case number:** 2018/17396

Ms B complained that the gas meter at her property was replaced without notice, after representatives of the gas distributor jumped the fence to enter her property. Ms B said she was working from home on the day and didn't answer the door bell as she knew she'd locked her gate. She said she'd lost revenue when she couldn't work for the rest of the day, due to the anxiety caused by access to her property without her permission and no prior notice of the work. Her claim for \$1,000 compensation had been refused by the gas distributor.

We registered Ms B's complaint as an Assisted Referral and facilitated contact with her by a higher-level contact within the gas distributor. She returned to EWOV saying the distributor hadn't contacted her as part of the Assisted Referral process, so we opened an Investigation.

Responding to EWOV's Investigation of the complaint, the gas distributor confirmed the meter was replaced as part of its 'Time Expired Meter Program'. It said Ms B had been notified that the exchange would happen sometime between mid-May 2018 and mid-June 2018. It explained that, where a customer isn't at home, the crew tests the fitting line to check for load on the meter (that is, whether any appliances are drawing gas). When the crew detected there was a load on the meter, they knocked on Ms B's door, but there was no response. So, for safety reasons her gas supply wasn't reconnected.

We reviewed the notice sent to Ms B and the *Gas Distribution System Code*. It appeared that the distributor had provided adequate notice of the meter exchange and the conditions for reconnection. Customer contact notes also showed that, although Ms B called to complain about having no gas, she was reluctant to provide access so the gas distributor's crew could revisit to reconnect.

Ms B maintained that she didn't receive the notice, but she said she'd accept compensation of \$500. She provided a detailed breakdown of why she believed \$500 was reasonable.

Initially the gas distributor offered a customer service payment of \$100. While maintaining that its actions (and those of its representatives) were appropriate, the gas distributor increased its offer from \$100 to \$500.

Ms B was satisfied with this outcome. The complaint was closed.

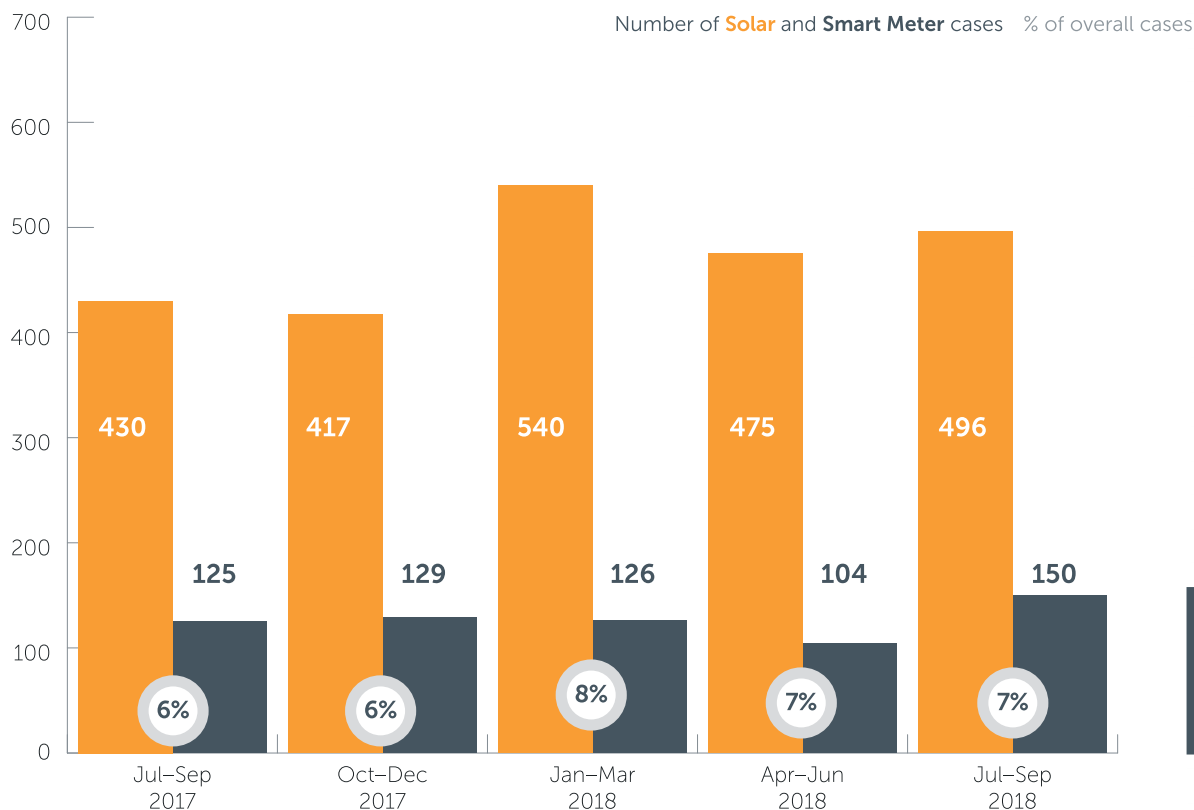
**"... they knocked on Ms B's door, but there was no response ... for safety reasons her gas supply wasn't reconnected."**



# SOLAR AND SMART METERS

FIGURE 6

Solar and Smart Meter cases



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



**12%**



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



**16%**



COMPARED TO  
LAST QUARTER  
**SOLAR CASES**



**4%**



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



**15%**

## Trends

### Smart Meter cases

In the July to September 2018 quarter, EWOV received 150 Smart Meter cases — 44% more than in the April to June 2018 quarter, and 20% more than in the July to September 2017 quarter. High bill, tariff, and provision at an existing connection were the most common Smart Meter issues raised with us by customers.

### Solar cases

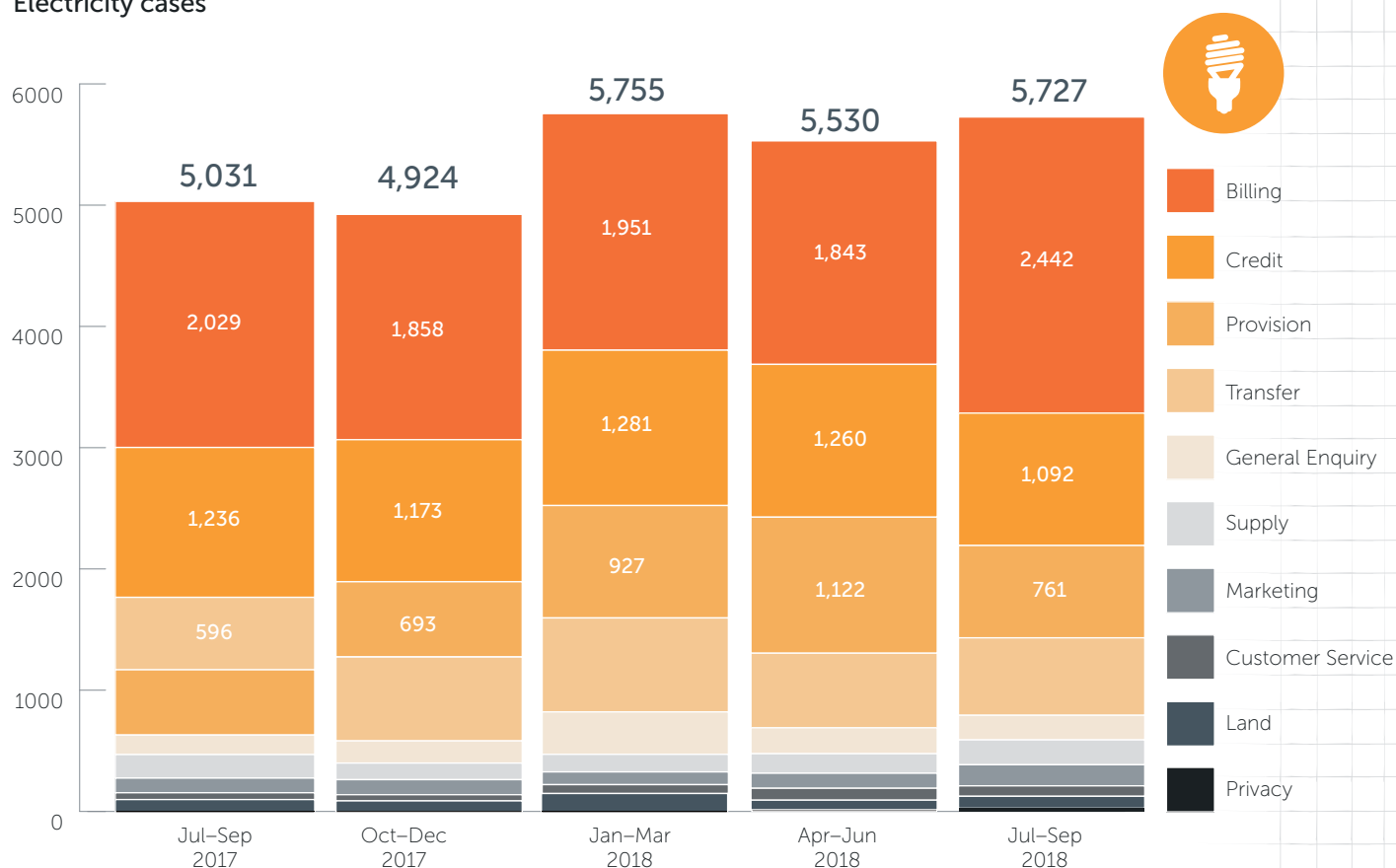
In the July to September 2018 quarter, EWOV received 496 solar cases — 4% more than in the April to June 2018 quarter, and 15% more than in the July to September 2017 quarter. Customers most commonly complained about tariffs and provision at an existing connection.

Of the 496 solar cases EWOV received, 81 (16%) were out of jurisdiction, mainly because the business complained about wasn't an EWOV scheme participant. Examples included solar installers, third party providers, solar power purchase agreements, and community energy projects. Customers raised a variety of complaints — misleading marketing, faulty inverters, solar installation delays, faulty solar PV, inverters lacking the required capacity, solar systems not working at full capacity, solar systems not installed incorrectly, and relevant paperwork not submitted to the electricity retailer or distributor. In these cases, we referred the customer to Consumer Affairs Victoria.

# ELECTRICITY

FIGURE 7

Electricity cases



COMPARED TO  
LAST QUARTER

**ELECTRICITY  
CASES**



**4%**



COMPARED TO  
THIS TIME LAST YEAR

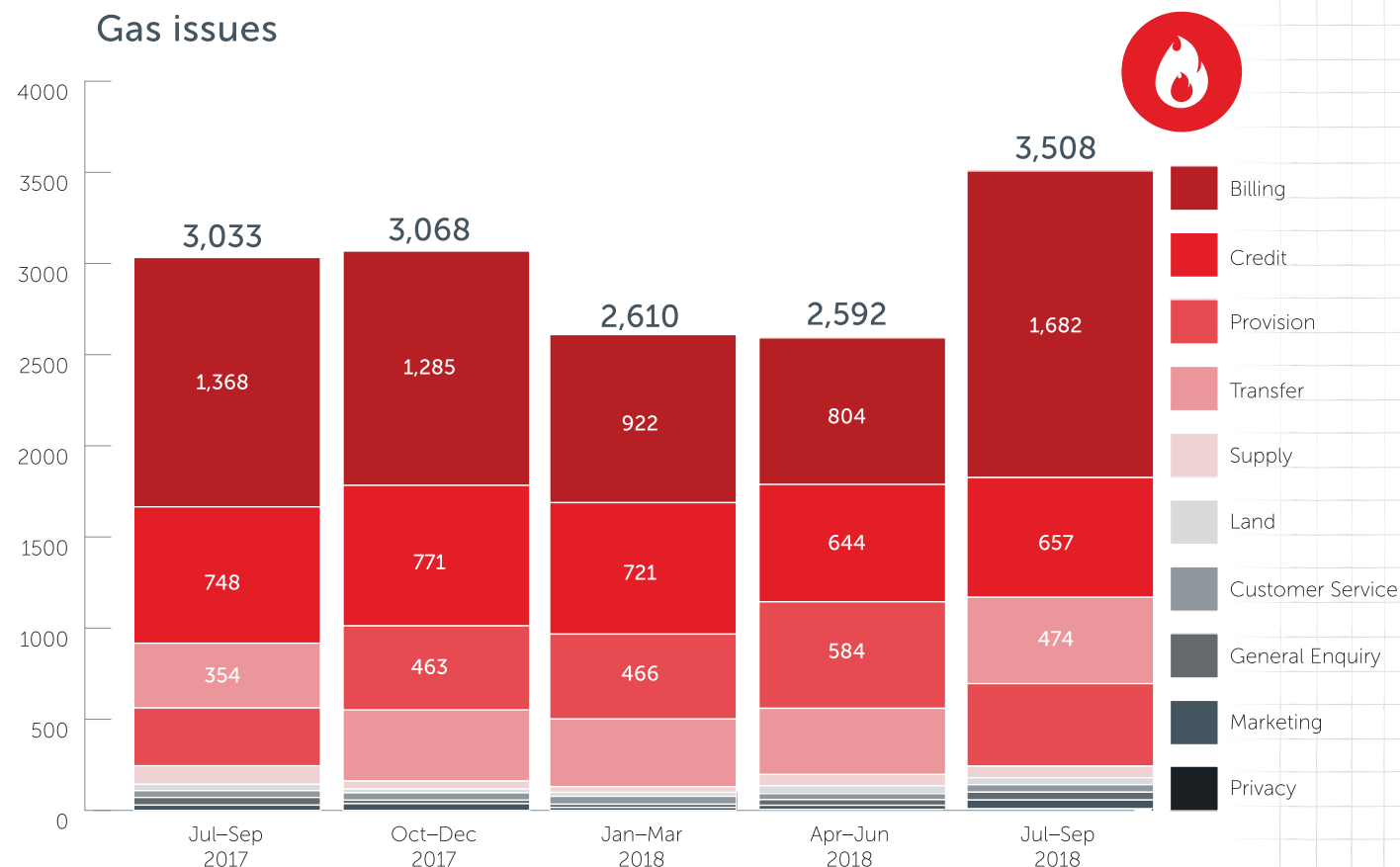
**ELECTRICITY  
CASES**



**14%**

# GAS

FIGURE 8  
Gas cases



COMPARED TO  
LAST QUARTER

**GAS CASES**



**35%**



COMPARED TO  
THIS TIME LAST YEAR

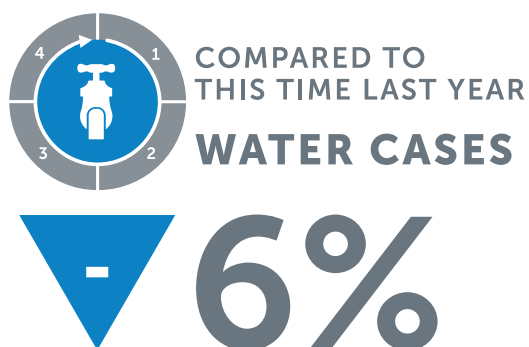
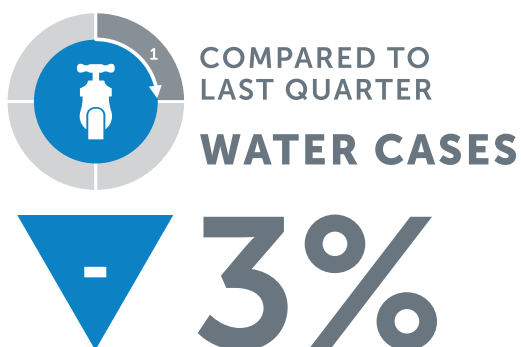
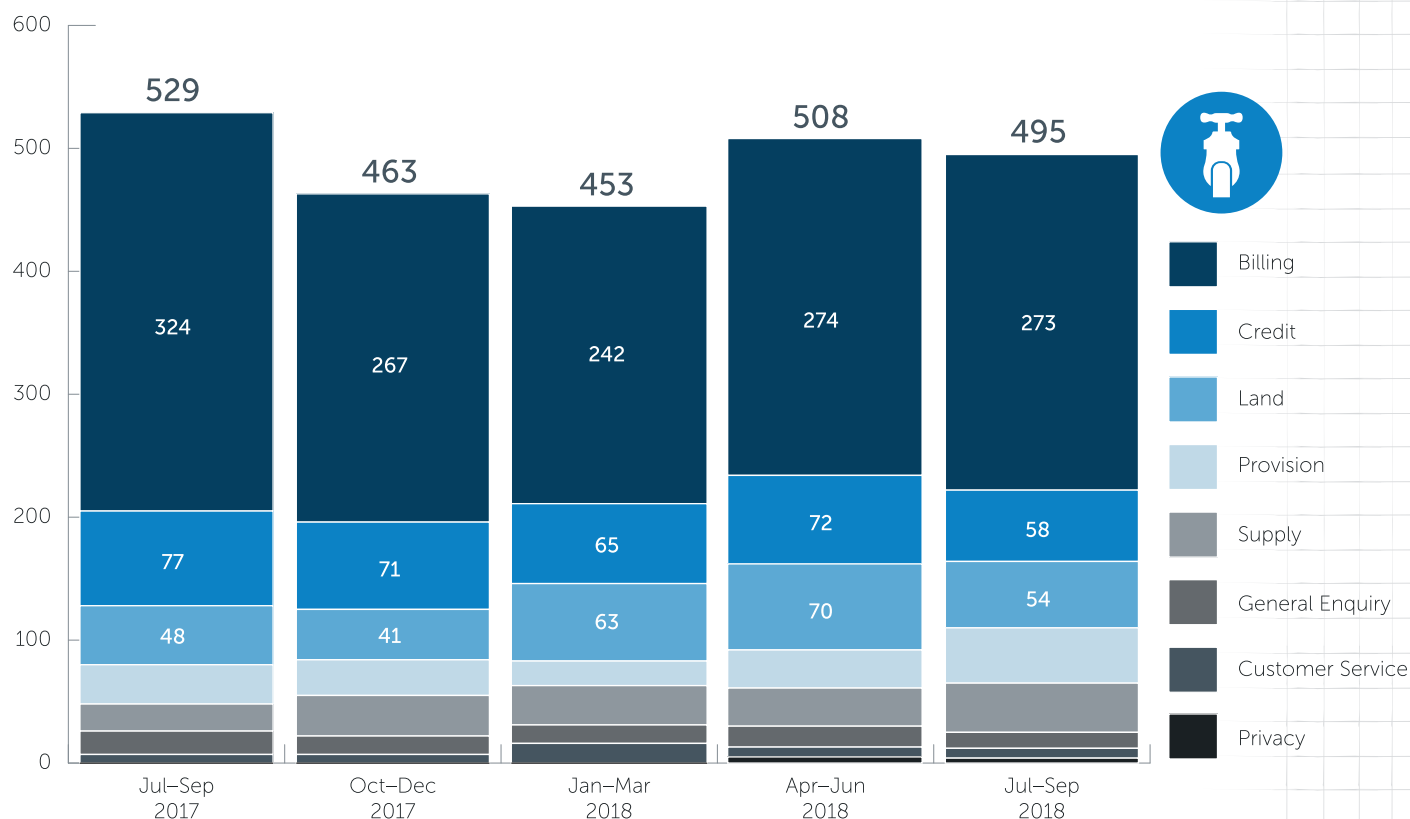
**GAS CASES**



**16%**

# WATER

FIGURE 9  
Water cases



# SYSTEMIC ISSUES

## Summary of systemic issue investigations opened and closed

July to September 2018

	Energy	Water	LPG
Open/Under Investigation	2	0	0
Closed	9	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.

## Systemic issues identified through EWOV's case handling

July to September 2018

### *Reminder notices short on business days*

Through EWOV's casework, we identified that even though an energy retailer's reminder notices factored in public holidays, they didn't give enough business days for the customer to make a payment. As a result, the notices didn't comply with clause 109 of the *Energy Retail Code* which requires a reminder notice period of no less than 6 business days. EWOV received three related complaints. We understand about 135 customers were affected. The retailer advised that the error, detected in June 2016, went back to March 2015. It said it had manually adjusted its credit cycle to address public holidays in 2016. In March 2017, it implemented a system change to prevent a recurrence. The retailer said it had made wrongful disconnection payments to all 135 affected customers. SI/2016/63

### *Unclear contract renewal documentation*

Through EWOV's casework, we identified that the renewal documentation for an energy retailer's customer contracts was unclear on whether the entitlement to Gold Class Movie Tickets also applied when the contract renewed automatically. We drew it to the retailer's attention. The retailer undertook to amend the wording on its new batch of renewal letters to make it clear that the customer must sign up to a new contract to continue receiving the tickets, not just allow the contract to renew. SI/2018/19

### *Inaccurate solar billing*

Through EWOV's casework we identified issues with one electricity retailer's solar billing that affected around 12,000 customers. For customers with solar export, the electricity usage information on the energy retailer's bill combined both import and export figures in both the graph and average daily usage. This wasn't compliant with the requirements of Clause 25 (1) (k) of the *Energy Retail Code*. The energy retailer made a system change to ensure that, going forward, the bills accurately showed the average daily usage, the average daily cost, and the average daily cost for each tariff component (for example peak and off-peak). The average daily usage, cost figures and the graph now don't include export. The bills now comply with clause 25 of the *Energy Retail Code*. SI/2018/6

***Scheduling of truck appointments***

Through EWOV's casework, we identified a systemic issue involving scheduling and rescheduling of truck appointments by registered electrical contractors (RECs) using an electricity distributor's online portal. While RECs could reschedule a truck appointment, the portal didn't update the distributor's scheduling tool and, as a result, the appointment wasn't rescheduled. The distributor said it was planning to remove the rescheduling facility from the portal. In the interim, an automated message on the portal sign-in page would tell RECs to ring a dedicated telephone number to reschedule appointments. SI/2018/36

***Large rate increases***

EWOV's casework highlighted that an energy retailer had raised its rates by large amounts. We received 14 complaints and we understand 2,364 customers were affected. The retailer advised that the increases affected customers on its variable rate and customers who had been recontracted after their previous contract expired. SI/2018/37

***Billing delays***

EWOV's case handling highlighted billing delays for some of an energy retailer's customers. The retailer said that meter readings weren't being correctly processed in its billing system to allow automatic billing. It was working on a solution. Until that was implemented, it was checking the accounts of the 108 affected customers manually each week and then billing as required to prevent ongoing billing delays. SI/2018/16

***Billing data mismatches***

Through EWOV's case handling, we identified that the start and end readings in an energy retailer's bills didn't match the billed usage sourced from the interval data. Our analysis revealed that, while the retailer was using the correct end index read, it wasn't using the correct start index read. Though customers' bills were found to be correct, the methodology wasn't compliant with clause (25) (1) (y) of the *Energy Retail Code*. The issue affected all the retailer's bills. It implemented a system fix. Its bills now display the correct start index read, and the difference between the start and end reads now matches the consumption billed. SI/2018/9

***Inconsistent calculation of GSL payments***

Through EWOV's case handling, we identified a problem with an electricity distributor's calculation of Guaranteed Service Level (GSL) payments. Where there was an incident on the distributor's network which caused a group of meters to go off supply, the distributor calculated the GSL payment from the time of the outage. Where a single meter went off supply due to an outage, it calculated the GSL payment from the time the customer informed it of the outage. This meant some customers received a lower GSL payment than they were entitled to. The distributor advised that it would change its approach to ensure that, where a single outage was reported by a customer, the GSL would be paid from when the power went out. SI/2018/17

***Offers to customers in a non-contestable area***

Through EWOV's case handling we identified that a gas retailer was wrongly providing offers to customers in a non-contestable area of Victoria. The retailer addressed the situation by writing to the customers who were wrongly sold gas to advise their contracts were cancelled. It said that all affected customers were able to transfer back to the retailer for the area. It said it had also implemented a systems change to ensure that, in future, customers in non-contestable areas don't progress through its sales process at all. SI/2018/44

# PUBLIC SUBMISSIONS MADE BY EWOV

## **Draft Decision: Energy Retail Code obligations for exempt sellers under the general exemption order 2017**

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

This draft decision sets out initiatives to keep customers informed of changes affecting their bills and whether they could access a better offer from their retailer. In EWOV's submission, we highlighted clauses of the new *Energy Retail Code* which we think could be changed, strengthened or retained. We recommended keeping clauses about publishing standing offers on retailer websites, as an important part of the effective operation of the licensed retail energy market. We suggested that the ESC provide a billing template for use by exempt retailers. We welcomed the retention of restrictions on recovering undercharged amounts. We supported the inclusion of Centrepay as a means of minimising payment difficulties and complaints.

[EWOV's submission online](#)

[About this ESC consultation](#)

## **Draft decision: Building trust through new customer entitlements in the energy retail market**

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

This draft decision outlines how the ESC proposes to implement the first tranche of recommendations from the *Independent Review of the Electricity and Gas Retail Markets in Victoria*, supported by the Victorian Government in March 2018. The recommendations outline new regulatory obligations for energy retailers. On the basis that customers should have the genuine benefit of the 'best offer' for them based on their energy usage, we supported inclusion of the 'best offer' on bills in a way that enables clear and easy access for all customers. We also made a number of other suggestions about the dollar threshold, change notices and exemptions (supporting the last with case examples).

[EWOV's submission online](#)

[About this ESC consultation](#)



# GLOSSARY

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