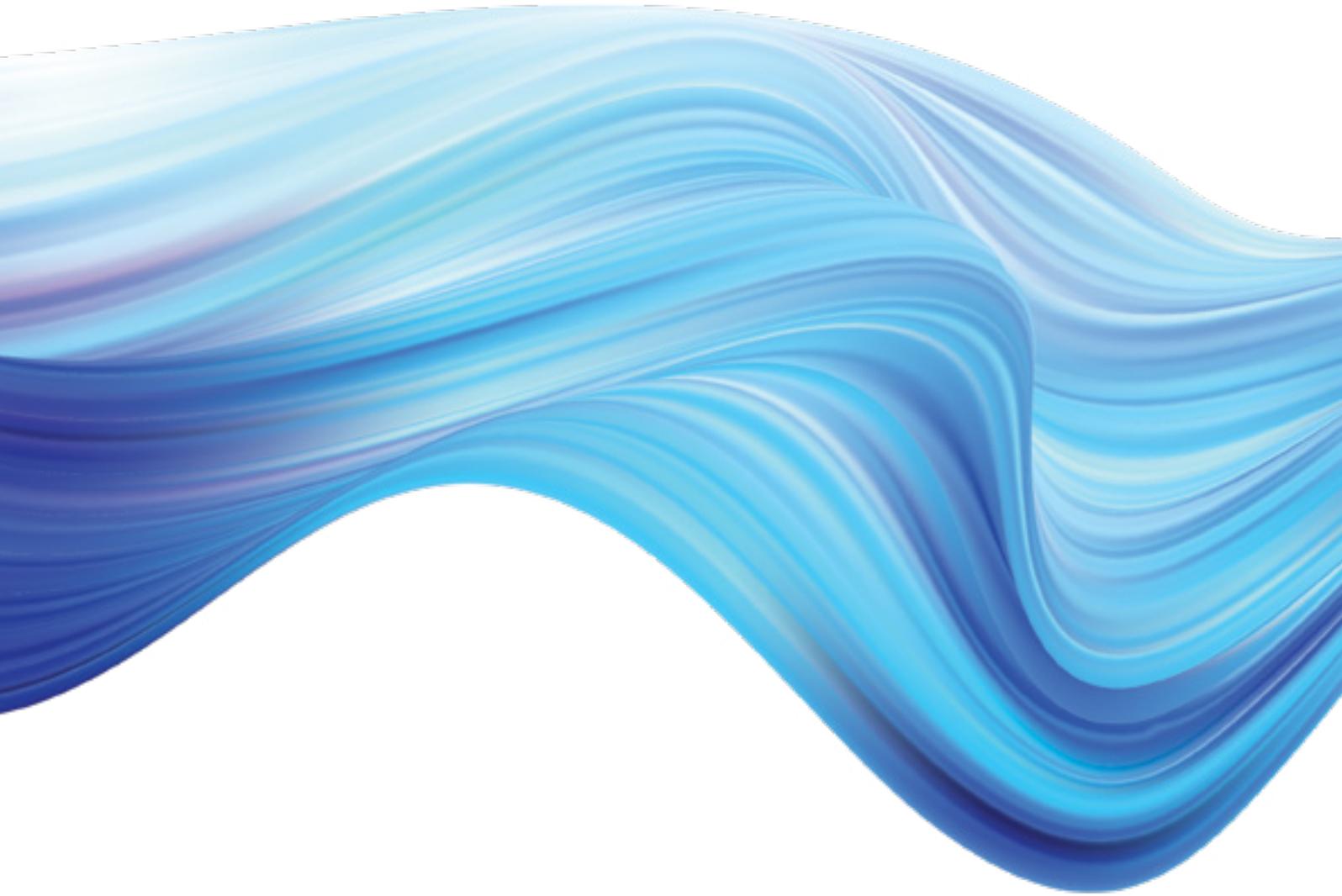


EWOV ANNUAL REPORT 2022



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

IN THIS YEAR'S REPORT

WHO WE ARE – WHAT WE DO.....	01
2021-22 SNAPSHOTS.....	02
ABOUT THE BOARD.....	04
FROM THE OMBUDSMAN	06
OBJECTIVES & STRATEGIC PRIORITIES.....	09
CASES RECEIVED & WHO LODGED THEM	20
DISPUTE RESOLUTION PROCESSES & OUTCOMES	22
ISSUES & TRENDS	28
BILLING	30
CREDIT	34
PROVISION	38
SUPPLY	39
LAND	40
MARKETING	42
TRANSFER	43
CUSTOMER SERVICE	44
PRIVACY	45
SOLAR	46
EMBEDDED NETWORK	48
SYSTEMIC ISSUES	50
ELECTRICITY	52
GAS	54
WATER	56
FINANCIAL STATEMENTS	58

OUR REPORTING RESPONSIBILITIES

This *Annual Report* is prepared and distributed in accordance with the Ombudsman's responsibilities under the *EWOV Charter* and the *Benchmarks for Industry-Based Customer Dispute Resolution (CDR Benchmarks)*.

DATA NOTE

The data in this report covers the year 1 July 2021 to 30 June 2022, run on 6 July 2022.

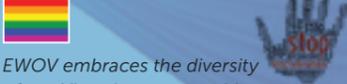
Percentages are rounded to the nearest whole number, so may not always add to 100%.

MORE ON OUR WEBSITE

See www.ewov.com.au for information on the cases we received in 2021-22 for individual energy and water companies, together with data visualisations and detailed graphical representations.



EWOV acknowledges the Traditional Owners of country on which we operate throughout Victoria and recognises their continuing connection to land, waters and culture. We pay respects to Elders past, present and emerging.



EWOV embraces the diversity of our Victorian communities. Every person, regardless of their race, religion, age, physical attributes or sexual orientation is entitled to be treated with dignity and respect. We oppose all forms of discrimination.

WHO WE ARE WHAT WE DO

Energy and Water Ombudsman (Victoria) (EWOV) is an industry-based ombudsman scheme. Its primary purpose is to provide a fair, accessible, independent, efficient and effective dispute resolution service to Victoria's energy and water customers and companies.

For EWOV to deal with a complaint, the energy or water company must be a member of EWOV Limited, the property must be in Victoria, and the customer should have tried at least once to resolve the complaint themselves by contacting the company directly.

While our service is free to customers, EWOV is not a customer advocate. Our scheme is independent in its structure and in its complaints handling and dispute resolution processes. We look at the facts and circumstances of each complaint, taking account of good industry practice and the law to reach fair and reasonable, and sustainable, outcomes.

EWOV was set up in late 1995 as Australia's first electricity ombudsman scheme. It opened to full operation in May 1996. Since then it has expanded to include natural gas (1999), water (2001), liquefied petroleum gas (LPG) (2005) and embedded networks (2018). To 30 June 2022, we had dealt with 751,065 cases.

As well as handling complaints, we draw on our case data and the frontline experience of our staff to contribute to industry improvement, and to inform policy and regulatory dialogue, to reduce the occurrence of complaints.

EWOV's operations are underpinned by the *EWOV Charter*, the *EWOV Limited Constitution*, licence conditions for the electricity and gas industries, the *General Exemption Order 2017* for embedded networks, relevant water legislation, the liquefied petroleum gas (LPG) industry code and the *Benchmarks for Industry-Based Customer Dispute Resolution (CDR Benchmarks)*.

OUR VISION

A fair and accessible energy and water market for all Victorians.

OUR PURPOSE

To independently and efficiently resolve energy and water disputes in Victoria and reduce their occurrence.

OUR PRINCIPLES

Accessible, fair, independent, efficient, effective, accountable.

OUR VALUES

We have courage to do the right thing. We are creative. Together, we are different. We aim high.

2022 ANNUAL REPORT

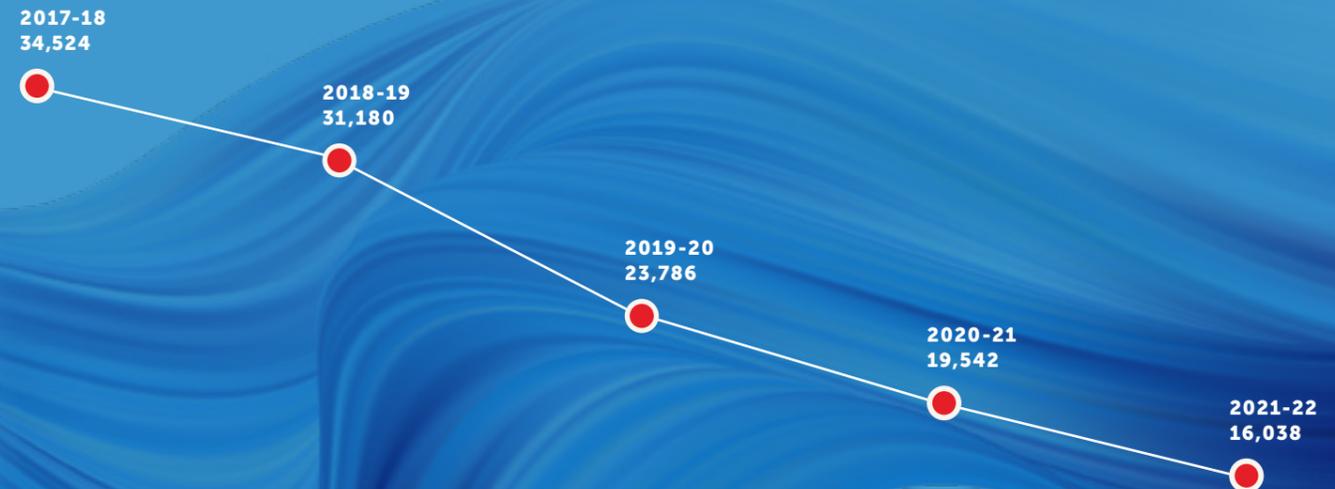
2021-22 SNAPSHOTS

16,038

RECEIVED
CASES

↓18%
FROM 2020-21

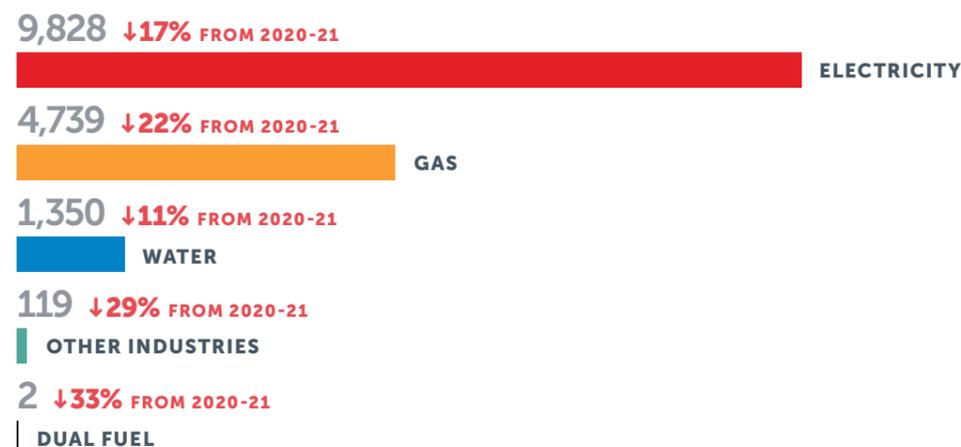
CASES RECEIVED: 5-YEAR HISTORY



BY CASE TYPE



BY INDUSTRY



BY CASE ISSUE



32
SYSTEMIC ISSUES IDENTIFIED AND CLOSED,
27 ENERGY AND 5 WATER

160
WRONGFUL DISCONNECTION PAYMENT ASSESSMENTS
FINALISED, WITH \$126,064 PAID TO CUSTOMERS

\$1,541,815
IN BILLING ADJUSTMENTS, SERVICE PAYMENTS AND DEBT
WAIVERS FOR CUSTOMERS THROUGH EWOV INVESTIGATIONS

ABOUT THE BOARD

FROM THE CHAIRMAN

I am delighted to report that EWOV has finished 2021-22 in excellent shape, notwithstanding, policy, regulatory and operational uncertainty, and the wide-ranging economic and social impacts of COVID-19.

Each year the Board agrees on a series of operational priorities with the Ombudsman and the Senior Leadership Team. These are set out in EWOV's Annual Plan and reflect the scheme's dual roles of dispute resolution and reduction of complaints. EWOV's strong performance is reported in detail in the 'Objectives & strategic priorities' section of this report. The Board thanks the EWOV team for their hard work and dedication, which ensured EWOV continued to provide a first-class dispute resolution service.

In April 2022, Cynthia Gebert stepped down as Ombudsman after 10 years in the role. Demonstrating the utmost integrity and excellent strategic foresight, Cynthia led EWOV through a period of significant organisational change. We wish her well in her new position as Telecommunications Industry Ombudsman. We also thank James Lawson, who acted as Ombudsman following Cynthia's departure. After an extensive recruitment process, Catherine Wolthuizen was appointed as the new EWOV Ombudsman. Catherine brings wonderful ombudsman, consumer and industry experience from leadership roles in utilities, financial services and professional services in Australia and the UK.

As I write this message, the national energy market is being described as 'in crisis'. Wholesale electricity prices have spiked, leading regulators to step in to ease community concerns about supply shortages and blackouts. Energy retailers are under pressure. Customers of all types and sizes are worried



Paul Sheahan AM
Chairman appointed
November 2014

about rising electricity and gas (and water) bills. As 'cost of living' meets 'cost of doing business', we expect requests (from customers and from industry) for EWOV's assistance will start to increase from the unusually low levels of the last few years.

In this uncertain environment, early identification of risks to EWOV becomes an even greater priority. It is part of the Board's role to use its collective industry and consumer experience to help EWOV monitor for risks and consider how they can be mitigated. We have reworked and refocused the Board's Risk and Emerging Issues Committee so we can do this more effectively.

During the year, the Ombudsman and I also continued to work with our interstate counterparts towards process harmonisation across the energy and water schemes around Australia. While significant synergy benefits are yet to materialise, we believe there is merit in continuing this work on a proportionate time and effort basis.

In July 2021, the Board welcomed a new consumer director in Lauren Solomon. In June 2022, we farewelled two consumer directors in Gavin Dufty and Ronda Held, thanking them for their valued insights and perspectives over nine and six years respectively.

In closing, I thank all EWOV Limited Directors for their contributions over another very challenging year.

Paul Sheahan AM
Chairman, EWOV Limited

DIRECTORS



Jonathan Briskin
Origin Energy
Industry Director,
appointed August 2014



Ronda Held
Consumer Director,
appointed July 2016



Gerard Brody
**Consumer Action
Law Centre**
Consumer Director,
appointed August 2014



Joanne Pafumi
**Powercor/CitiPower/
United Energy**
Industry Director
appointed April 2021



Gavin Dufty
**St Vincent de
Paul Society**
Consumer Director,
appointed August 2013



Lauren Solomon
Consumer Director,
appointed July 2021



**Eugenio (Gino)
Fragapane**
AGL Energy
Industry Director,
appointed August 2015



Peter Quinn
Industry Director
appointed August 2018

Company Secretary
Christopher See, EWOV,
appointed October 2008

GOVERNANCE STATEMENT

Energy and Water Ombudsman (Victoria) Limited is a company limited by guarantee and not having share capital. The objective of the company is to independently and efficiently resolve disputes between customers and energy and water service providers in Victoria, with the further aim of reducing the occurrence of disputes. To fulfill this objective, EWOV Limited has set up a dispute resolution scheme called Energy and Water Ombudsman (Victoria) (EWOV) and appointed an Ombudsman who has authority under the *EWOV Charter* to receive, investigate and facilitate the resolution of complaints. The 'members' of EWOV Limited,

some of which trade under multiple business names, are the 'scheme participants' of the EWOV dispute resolution scheme.

The EWOV Limited Board is responsible for the business affairs and property of the company, including corporate governance, the setting of budgets, risk management, strategic planning and ensuring the Ombudsman's independence. The day-to-day operation of the EWOV dispute resolution scheme is the responsibility of the Ombudsman. The roles of the Board and the Ombudsman are complementary, with the Ombudsman attending Board meetings.

FROM THE OMBUDSMAN

CHANGING AND ADAPTING

While the intense restrictions of the COVID-19 pandemic hit hard, and the almost constant need to adjust how we were working was often difficult and frustrating, EWOV has emerged from the past few years a more agile, flexible, creative and robust organisation.

Integral to the changes that have been made has been learning, and demonstrating, how a hybrid working model can deliver sustainable performance. A new *The Way We Work Playbook*, developed with the staff team, formalises EWOV's approach to hybrid, flexible work and articulates updated value statements that resonate with each of us.

This has all been part of a positive transformation, which may otherwise have taken us longer to achieve, and one that sets us up well for the future.

"A positive transformation, which may otherwise have taken us longer to achieve."

UNPREDICTABLE CASE TRENDS

In an unexpected trend, EWOV's cases have fallen significantly for four years straight, down from 31,180 in 2018-19 to 16,038 in 2021-22. Clearly, the extended pandemic has contributed to this. Alongside regulatory interventions, energy and water companies have continued to show compassion for customer circumstances, holding off on

disconnections and debt collection. Government financial support has helped people stay afloat and pay their bills. We're also confident that years of work by EWOV to share our complaints handling experience has helped to improve outcomes and reduce complaints.

It remains to be seen whether cases have plateaued, will fall further or will increase. Affordability is back in the headlines, with cost-of-living increases across the board. People are worried about their expenses rising faster than their incomes. Electricity and gas tariffs have increased. Winter bills are arriving. And disconnection activity is increasing, albeit, currently, at lower levels than before COVID.

In the wake of the current 'energy crisis', company viability is also in the spotlight. Some customers have been told to look elsewhere because their current retailer can no longer provide competitive pricing. Advertised offers have been withdrawn. Some retailers say they aren't taking on new customers. And, following retailer collapse, some customers have found themselves automatically moved to large retailers under 'retailer of last resort' (RoLR) arrangements.

Each of these developments has the potential to increase customer contacts with EWOV.

KEEPING OUR PROMISES

2021-22 saw a focus on building EWOV's capabilities in five key areas – communications, information exchange, knowledge, data as a service, and accessibility – to deliver on the three 'find you, explain it for you, work with you' commitments of the *EWOV Promise*. This work is challenging and will make sure our efforts are focused where they'll be most valuable, and that what we do and how we do it reflects current stakeholder expectations.

Aligned to the first *EWOV Promise* element 'we will find you', a targeted content strategy is helping ensure we reach more customers and community organisations with clear information that suits particular situations. Often delivered via social media, examples include help that's available for communities affected by bushfires or storms; rights and responsibilities around electricity and gas outages and water quality; and the availability of EWOV's free dispute resolution service.

A 'no wrong door' initiative is helping to lessen the frustration customers feel when they have to repeat their complaint over and over again as they search for the right body to help them. Now, where we assess that EWOV can't help directly, we tell the customer who can help and why, and we offer to forward their complaint directly to the other body, with their permission. So far, this well-received reciprocal referral process has been set up with 18 organisations.

In another initiative, the process through which customers can express concerns about how EWOV has handled their complaint has been simplified, giving our staff a better opportunity to respond to, and learn from, the points the customer raises.

Because the *EWOV Promise* is about what we need to deliver for EWOV to continue to be a high-performing dispute resolution scheme, it isn't something that has an end point. Now embedded in 'how we do things around here', it will change and adapt as we change and adapt to meet stakeholder expectations.

"We will find you. We will explain it for you. We will work with you."

SUPPORTED BY FIT-FOR-PURPOSE SYSTEMS

We know people want to be able to engage with EWOV in ways that, first and foremost, work for them. To be able to deliver to these expectations, we need robust, capable and fit-for-purpose information technology systems.

After analysis of what fit-for-purpose should look like for EWOV, and with the Board's support, our team embarked on one of the biggest operational changes in EWOV's history and made the move to a Salesforce solution.

This new software platform, which we've named SPARX, is being phased in over three years. Phase one was the replacement of our case management system. Phases two and three will deliver integration of external capabilities, including portals.

Staff confidence in the new platform is increasing, key performance indicators are being met, and the live allocation process has been well received by customers. The change of our case management system has been a major undertaking, but one that's essential for maintaining our performance.

MORE CONSISTENT APPROACHES NATIONALLY

EWOV has also been working on a number of harmonisation initiatives with its interstate counterparts to adopt better practice approaches, wherever they currently exist. As well as helping deliver a more consistent approach to our work, this goes to meeting stakeholder expectations for greater consistency across energy and water ombudsman schemes around Australia.

Current projects include a common approach to case management through shared case classifications, naming conventions, timeframes and process steps; a common funding model; and comprehensive shared jurisdiction expansion to ensure our schemes can deal with complaints about new and emerging energy products and services.

TAKING CHARGE OF HOW WE CHANGE

Over 2021-22, important changes were made to how EWOV delivers its dispute resolution services. New ways of working were introduced to better align with the new case management system. Improved use of data and feedback mechanisms put the emphasis on quality outcomes, rather than process compliance. Measures of customer and scheme participant satisfaction and experience reflected our focus on positive engagement with both parties to resolve disputes.

At the same time, a strong approach to data sharing was maintained – through stakeholder briefings, our online Data Hub and in publications – providing direct 'real-time' insights into the issues driving complaints. We engaged with the energy and water companies, policy makers and regulators, and with customer representatives and community groups, to understand the issues from their perspectives. EWOV's experience also continued to be contributed to major programs of work, especially in the rapidly changing energy sector with the publication of a major research piece, VOICES.

In all of this, the team has been guided by values, behaviours and work practices built around trust, innovation, diversity, and high quality. The focus is on ensuring EWOV remains as relevant as it was when it first opened to complaints over 26 years ago. Much has changed in that time, but the need for EWOV hasn't.

While I'm releasing this Annual Report, the 2021-22 year was under the leadership of Ombudsman, Cynthia Gebert and, from April 2022, Acting Ombudsman, James Lawson. I thank them both for the first-class foundations they've laid.

It's exciting to have joined EWOV at such an important time for the energy and water sectors. I'm looking forward to working with the staff team, the energy and water companies, customer and community representatives, regulators and government to help improve outcomes and consumer protections.

Catherine Wolthuizen
Energy and Water Ombudsman (Victoria)



"In all of this, the team has been guided by values, behaviours and work practices built around trust, innovation, diversity, and high quality."

HOW EWOV INVESTIGATES COMPLAINTS IN A FAIR AND REASONABLE WAY

'Fair and reasonable' is an EWOV fundamental. It's been explicit in the *EWOV Charter* since our scheme was set up as the Electricity Industry Ombudsman (Victoria) in 1995.

A *Fair and Reasonable Investigation Framework* guides us in taking a reasoned, logical approach to identifying and assessing what's fair and reasonable in the circumstances. It also helps us explain our view of that as it applies to a particular complaint. The framework consists of six categories against which we assess customer and company positions, expectations and offers.

In 2021-22, we streamlined the assessment process, to move away from a focus on this being used only for formal Investigation reports. A fair and reasonable lens is adopted by staff throughout our complaint process, with elements of the framework being drawn on as required.

EWOV'S FAIR AND REASONABLE INVESTIGATION FRAMEWORK



CUSTOMER CONSIDERATION

EWOV considers the individual circumstances of a customer, their contribution to the complaint and the financial impact experienced.



ADVICE AND INTERVIEWS

During an investigation EWOV will consider any regulatory, departmental, technical or legal advice relevant to the specific investigation. EWOV will also interview any relevant others, if required, during the investigation.



COMPANY CONSIDERATION

EWOV will consider the application of the company policies and procedures, customer service performance and contribution to the complaint in its investigation.



GOOD PRACTICE

EWOV will establish if the actions of the company are in line with good industry practice and where applicable other industry practice.



LAWS AND REGULATIONS

EWOV has regard to laws, codes and regulations relevant to the specific investigation.



PREVIOUS CASE RESULTS

EWOV will review previous investigations and decisions to guide an investigation where relevant.

OBJECTIVES AND STRATEGIC PRIORITIES

The EWOV Board and EWOV's Senior Leadership Team agreed on the following strategic priorities for 2021-22.

OPERATING MODEL

To provide efficient, effective, fair, and independent dispute resolution services to energy and water customers and companies

INDUSTRY RELATIONSHIPS

To foster effective, collaborative relationships and drive continued customer service improvement by companies

CUSTOMER AND COMMUNITY ENGAGEMENT

To ensure the accessibility and awareness of EWOV

POLICY AND INFLUENCE

To be a respected provider of high quality, independent information, analysis and advice about the customer experience of the energy and water industries

SYSTEMS AND DATA ANALYSIS

To deliver robust and capable information technology and data solutions to support EWOV's goals

FUTURE SCOPE AND CAPABILITY

To ensure EWOV remains relevant and effective in a changing environment

HUMAN CAPABILITY

To foster an agile, high-performing workforce

OPERATING MODEL

STRATEGIC PRIORITIES

- Improve ability to identify and respond to fluctuations in case volumes
- Embed a continuous improvement culture and approach to all EWOV processes
- Strong and effective financial management that balances efficient and fair operations

SUCCESS MEASURES

- Meet or exceed key performance indicators by 30 June 2022
- Meet cost per case outlined in the 2021-22 budget

OUR PERFORMANCE

We registered 16,038 cases, with 193 of these also requiring a wrongful disconnection assessment.

We finalised 14,145 cases – 794 as Enquiries, 2,113 as Unassisted Referrals, 8,863 as Assisted Referrals, and 2,375 as Investigations.

From our Investigations, customers received \$1,541,815.57 in billing adjustments, service payments and debt waivers.

We exceeded five of six key performance measures for case handling. This enabled us to strengthen two measures starting 1 July 2021, and a third measure starting 1 July 2022.

- Accessible and efficient service to customers contacting us on the 1800 number
 - Calls answered in 30 seconds: KPI = 85%. Result = 86.6%.
- Timely and sustainable resolution of straightforward cases
 - Stage 1 Investigations closed within 28 days: KPI = >90%. Result = 90.7%.
 - Stage 1 Investigations not reopened: KPI = 99%. Result = 99.8%.
- Effective and efficient Investigations (Stage 1 and Stage 2+)
 - Average days to close: KPI = 46 days. Result = 49.3 days.
 - Closed within 180 days: KPI = >98%. Result = 98.6%.
 - Not reopened: KPI = 98%. Result = 99.1%.

Time spent reduced across all complaint types. We substantially reduced the number of 'aged cases' (over 180 days). We then redefined an 'aged case' as anything over 90 days and updated our organisational KPIs for 2022-23 accordingly.

We achieved an overall customer satisfaction rating (excellent or good) of 78% (down 2%) and a Net Promoter Score of 54% (down 4%).

Our total expenditure was \$9.9 million, \$1.6 million (14%) under budget.

We applied the EWOV team's technical insights and abilities, and our extensive knowledge of energy and water issues, to the Investigation process – rigorously testing company and customer actions and positions to bring about fair and reasonable resolutions.

Ahead of implementing our new case management system (SPARX), we introduced new ways of working:

- We empowered staff to make individual decisions about the next steps based on the case in front of them.
- We streamlined our fair and reasonable assessment process to focus on the facts in dispute.
- We improved the use of data and feedback mechanisms to ensure quality outcomes, rather than focusing on process compliance.
- We developed the Service Team to be able to resolve Stage One complaints, reducing the handover of cases between teams. This increased the efficiency of resolution, and the skills and capacity of the teams to manage the ebb and flow of case volumes.
- We brought forward the allocation of more complex complaints, linking in the Conciliator responsible for resolving the complaint earlier in the process.

INDUSTRY RELATIONSHIPS

OUR PERFORMANCE

We included our scheme participants in key community outreach events, and otherwise shared insights we gained from the community through our outreach and engagement work.

Our engagement with industry through regular meetings and workshops of the Energy Security Board's Customer Insights Collaboration Stakeholder Steering Group increased our understanding of the pace at which companies are working to introduce new products and services, and their approaches to customers.

We worked closely with three Victorian distributors, sharing insights into the emerging energy market and changing policy and regulations.

Additional data in the Member Portal is providing scheme participants with more information about their own complaints, and how they compare with others in their sector categories (de-identified).

We changed our approach to EWOV's systemic issues function to better identify trends in our case data and improve staff awareness of potential systemic issues. We used our Investigation process to work with scheme participants to improve outcomes.

EWOV Member News continued to perform well with an average open rate of 29% and a click-through rate of 5% (both above benchmark rates). Content included planned improvements to the 'member portal' and current trends in EWOV cases in relation to Aboriginal and Torres Strait Islander peoples, complexity of large business customer disputes, planned works, family violence and backbilling.

The last 12 months saw a big uptake of energy retail licences by smaller/ start-up companies operating very different business models to those of traditional energy retailers – for example, solar and energy efficiency companies wanting to add retail to what they already do to offer a 'package deal' or a 'one-stop-shop'. So that it's easy for non-traditional companies to join EWOV, we've ensured our process is aligned with that of the ESC. We harmonised the processes for different membership types, so that as member categories change these processes remain relevant. We also increased process automation and simplified information input.

Our yearly survey of scheme participants helps us to understand their view on our performance. Survey questions measure us against the *CDR Benchmarks*. Results for all Benchmarks improved from the previous year. Effectiveness and Fairness were rated the highest in five years, while Accountability, Efficiency and Independence remained relatively stable.

STRATEGIC PRIORITIES

- Actively seek and act on feedback
- Share our knowledge and insights
- Collaborate to drive customer service improvements and reduce complaints

SUCCESS MEASURES

- Sustained levels of scheme participant satisfaction relative to 2020-21
- Improved engagement with EWOV's industry communications relative to 2020-21

CUSTOMER AND COMMUNITY ENGAGEMENT

STRATEGIC PRIORITIES

- Engage with all customer groups, especially vulnerable and disadvantaged customers
- Actively seek and act on feedback
- Share our knowledge and insights

SUCCESS MEASURES

- Maintaining positive community agency participation with a view to improving understanding of EWOV's role and process
- Sustained high levels of customer satisfaction and positive community agency feedback

OUR PERFORMANCE

We drew on Energy Consumers Australia's Consumer Sentiment Survey to shape our approach to customer awareness and engagement. We adapted our approach further to support continued (mostly online) outreach in a hybrid work environment.

We continued to focus on our identified priority areas — Wyndham catchment, Gippsland region and Dandenong/Casey.

Working with existing and new partners, we reached a broad and diverse customer base through our online engagement. For example, in conjunction with the Australian Red Cross, Good Shepherd, Uniting and the Asylum Seeker Resource Centre, we presented an energy information session to the Persian community.

We brought insights from community organisations into EWOV, with speakers from Ask Izzy (a website that connects people in need to a range of support services including housing, a meal, financial assistance, family violence support), the Victorian Small Business Commission, the Council on the Ageing, and the Federation of Community Legal Services. This built EWOV's understanding of the range of services available and the role these organisations play in the broader economy.

A new Content and Communications Strategy has improved the quality of our external communications — raising awareness, increasing audience engagement, converting aware audiences into long-term audiences, and building relationships with organisations that can help us get our messages out to those who need to hear them.

We produced several publications for customers and the community, to build understanding and awareness of the case handling, outreach and systemic issues aspects of our work.

We tested different approaches to getting relevant information out to community stakeholders and to consumers more broadly.

Sponsored posts on Facebook were targeted to specific audiences and modified for location and age to best get our message across. Content included disconnection rights, available concessions, debt collection requirements, outages, and cost of living.

We optimised our Facebook posts for click-throughs to our website, where customers can get more information and learn how to make a complaint. We reached almost 200,000 users with our content and received almost 13,000 click-throughs to our website. We achieved a cost per 1,000 impressions of \$6.30 (against a benchmark of \$10.22), a cost per click-through to our website of \$0.42 (against a \$0.72 benchmark), and a click-through rate of 1.51% (against a benchmark of 1.41%).

While we increased our activity and the quality of our posts, organic Facebook click-throughs were lower than paid Facebook posts, due to restrictions of the algorithm governing reach. However, reactions were high. We got 3,258 click-throughs to our website and 839 reactions to our posts, compared to almost 13,000 click-throughs for paid Facebook and 656 reactions.

PHOTOS

- 1 In June, we had a fantastic day in Broadmeadows at Hume City Council's Bring your Bills event.
- 2 In May, we participated in the Koori Women's Program, where we took part in activities and provided information and support for the attendees.
- 3 We joined an EDR forum in May. Many people joining the forum are financial counsellors, who dedicate their days to assisting people in financial difficulty.
- 4 In June, we joined the Hume City Council's Refugee Week event held in Craigieburn. Together with a wide range of community partners and local residents we celebrated the contributions and achievements of refugees and people seeking asylum with a shared lunch, activities and talent show.



1



2



3



4

POLICY AND INFLUENCE

STRATEGIC PRIORITIES

- Share our knowledge and experience
- Foster strong relationships with regulators and policymakers
- Broadly scan the external environment for influences on EWOV and identify strategic responses

SUCCESS MEASURES

- Stakeholders value EWOV information and contributions to policy issues
- Ongoing and sustained engagement with EWOV's publications agency feedback

OUR PERFORMANCE

We continued to contribute EWOV's complaint handling experience and data, and the stories of the customers who sought our help, to inform a wide range of policy and regulatory consultation processes.

We made four formal submissions, to the following consultations:

- Embedded Networks Review Panel's *Embedded Networks Draft Recommendations Paper*
- Essential Services Commission's *Payment Difficulty Framework Review*
- Essential Services Commission's *Regulatory Sandbox Framework*
- Australian Energy Regulator's *Retail Authorisation Review*.

We provided five tailored responses to data requests from regulators, government, customer advocate groups and the media.

We supplemented data requests with regular data briefings for regulators and government agencies.

We saw an increase in engagement with the case data that we update monthly in the Data Hub on our website.

We used a range of strategies — such as briefings from community partners and media monitoring — to keep up with developments in our external environment and assess how those may affect EWOV.

In stakeholder discussions about 'future-proofing' consumer protections, we prioritised the importance of access to external dispute resolution — especially in our engagement with the Department of Environment, Land, Water and Planning and, over the second half of the year, our weekly participation in the Energy Security Board's Consumer Insights Collaboration Steering Group.

We released a second systemic issues report, highlighting issues around solar.

We drew on our solar casework to produce a Solar Customer Journey Map setting out the multiple steps people must go through to install solar panels. It highlights the complexities of the solar installation process, and the need for consumer protections and access to dispute resolution when things go wrong. The map has been shared with key stakeholders in policy and regulation and is seen as a valuable resource in the development of an approach to the Energy Security Board's Distributed Energy Resources strategy.

Through regular meetings and data sharing, we developed our working relationships with the Essential Services Commission, Department of Environment, Land, Water and Planning, Consumer Affairs Victoria, Australian Energy Regulator, and Australian Competition and Consumer Commission.

SYSTEMS AND DATA ANALYSIS

OUR PERFORMANCE

We shifted our focus to align with our objective of delivering future-proofed, capable systems and data solutions. At the same time, we remained strongly focused on ensuring our environment remained secure and robust.

We maintained a minimum 99.5% functioning of key business systems during our operating hours.

We implemented EWOV's new complaints management system (SPARX) on time and under budget.

A refreshed data warehouse now underpins our reporting capabilities and is supporting our push to more predictive and prescriptive data analytics, aligning with our data analytics framework.

The new environment is functioning well, staff have adapted to the improved method of complaint handling, and our regular collection of system data shows we're tracking well towards the anticipated efficiency gains.

Since deployment, and with staff engagement and understanding of the platform, close to 100 improvement ideas and initiatives have been raised through the change control process, further improving platform capability and efficiency.

Work has commenced on the next stages — a Customer Portal (Stage 2) and a Member Portal (Stage 3).

On the security front, we continued to enhance and tighten our 'Essential 8' security framework. A penetration test returned a favourable result, aligning with a secure and robust IT environment. The framework responded well to a critical security threat, enabling us to identify and nullify the 'zero day' exploit before it caused any damage.

We developed a Facebook Messenger chat function, including an out-of-hours automated response capability, for customers reaching out via that channel. We've increased our accessibility through the introduction of this function and by being available 24 hours a day.

In line with our cloud migration strategy, we began the movement of systems across to the cloud. Two of our key business systems have now been migrated — email and case management. The footprint of our on-premises servers is gradually being reduced, with the goal to have all production environments in the cloud by May 2023, coinciding with the timing of our server 'extended maintenance' renewal.

STRATEGIC PRIORITIES

- Robust and capable information and communications technology

SUCCESS MEASURES

- Key business systems are functioning 99.5% of the time during EWOV's operating hours
- Timely and effective analysis of complaint trends

FUTURE SCOPE AND CAPABILITY

STRATEGIC PRIORITIES

- Proactively influence the dispute resolution environment in a changing energy and water market
- Work with key stakeholders to create a robust consumer protection framework
- Develop an organisation with ready-to-adapt governance, funding, operating model

SUCCESS MEASURES

- EWOV has the information required to make decisions about its role in 5-10 years
- EWOV has the capability to meet its purpose

OUR PERFORMANCE

Over the past year, we transformed EWOV's systems, processes and work culture. A portfolio of initiatives has revolutionised how we think about our case work, putting customer experience at the centre of what we do. Core to two parties resolving a dispute — now and into the future — is strong, positive engagement with EWOV's alternative dispute resolution processes. For both parties to reach an agreement requires confidence and trust in EWOV right from the start of their engagement with us. The work we've done — and the change and project management approaches embedded in how we work — will enable us to continue to improve EWOV's capability moving forward.

In August 2021, we released VOICES — featuring research undertaken by the Australian National University's Battery and Storage Grid Integration Program, on behalf of EWOV and the Department of Environment, Land, Water and Planning. The release was accompanied by a lead article in ABC Online and a segment on the 7.30 Report. The report was also shared in direct emails to key industry and market representatives, via EDM to our report database, and on social media (leveraging heavily off ABC and 7.30 Report posts). The Conversation also featured a piece, written by the researchers, further reinforcing the message of the report.

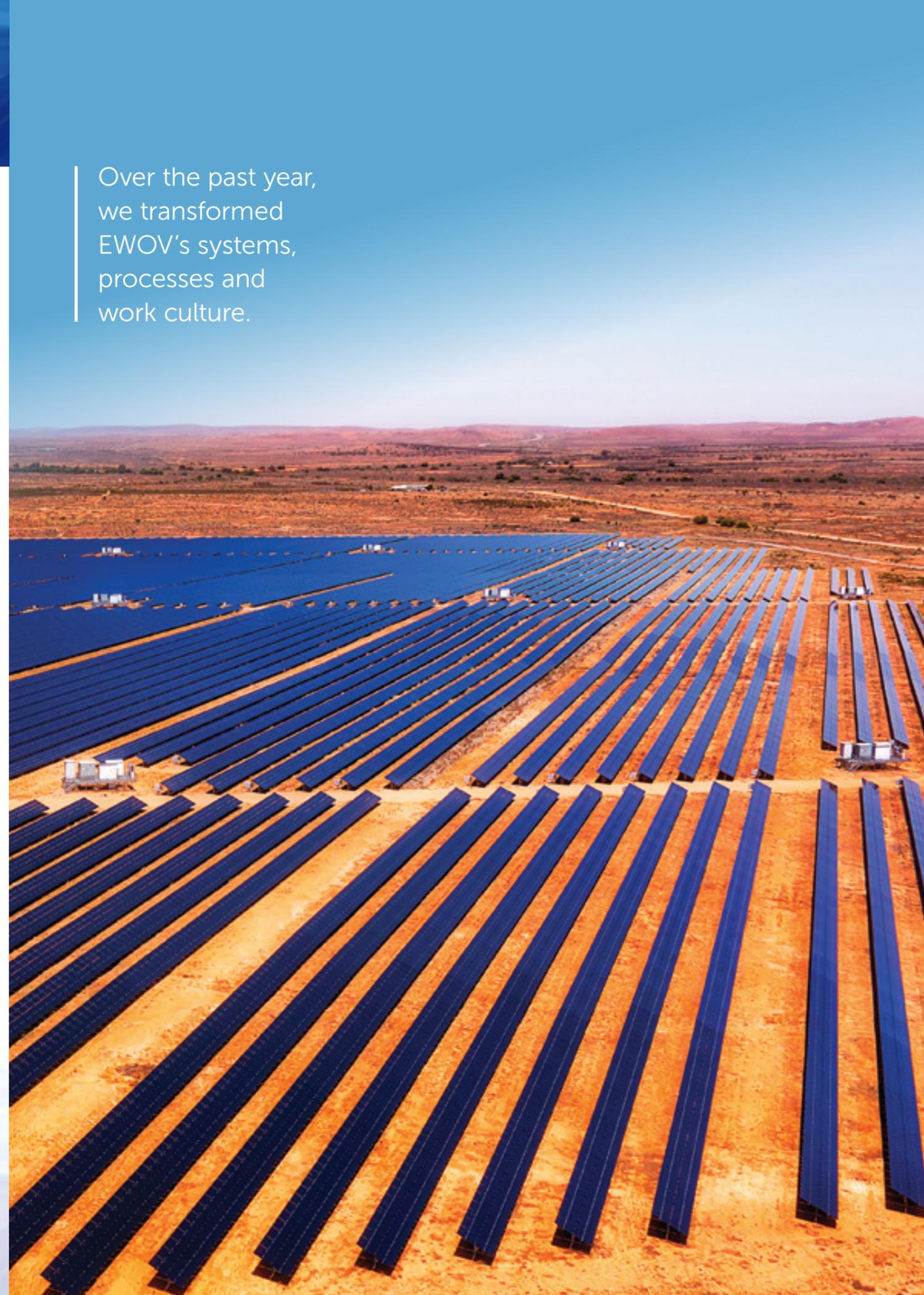
We followed the VOICES report release with a comprehensive series of meetings with state and national policymakers and regulators, peak bodies and our scheme participants to re-emphasise the importance and value of customer experience and complaint feedback in the development of the regulatory

landscape around new products and services. Our conversations, internally and with key stakeholders, continue to focus on EWOV's jurisdiction — to ensure that the customers of new energy services have access to free, independent, dispute resolution.

We led detailed discussions with the other energy and water ombudsman schemes around Australia to identify better operational practice across the schemes, and to harmonise around this. In principle agreement for consistency of complaint stage nomenclature and timeframes has been achieved — implementation across the schemes is pending and is dependent on system and resource limitations and differing approaches to billing. In the meantime, closer engagement between operational teams has been valuable and has helped to deliver smaller operational improvements.

The need for clear rules and guidelines around land access in relation to new transmission infrastructure was highlighted with the Essential Services Commission's *Electricity transmission company land access statement of expectations*, which took effect on 1 June 2022. The statement confirmed that EWOV is the appropriate dispute resolution body for land access complaints. We're working closely with AusNet, the Australian Energy Infrastructure Commissioner, VicGrid and others to ensure that a fit-for-purpose customer-focused complaint process is in place. As part of this work we're also ensuring that complaints which are outside of EWOV's jurisdiction can be referred seamlessly to the right body.

Over the past year, we transformed EWOV's systems, processes and work culture.



HUMAN CAPABILITIES

STRATEGIC PRIORITIES

- Our people – their safety, development and processes
- Strong governance processes

SUCCESS MEASURES

- Sustained staff engagement survey results
- Sustained employee performance

OUR PERFORMANCE

Once able to return to the CBD, we focused on rebuilding our connection, collaboration and wellbeing initiatives. Staff engagement increased to 82% (from 66%) with a participation rate of 88%.

We ran a series of all-staff workshops to establish parameters for organisational, team and individual rituals and behaviours, and new future-focused cultural values:

- We have courage to do the right thing (trust)
- We are creative (innovation)
- Together, we are different (diversity)
- We aim high (high quality).

These values and behaviours, and our approach to hybrid, flexible work, were formalised in a new The Way We Work Playbook. The Playbook now forms part of our recruitment information for prospective staff.

We conducted thematic reviews of our case handling practices for Aboriginal and Torres Strait Islander customers, customer responsibilities and expectations, and the uptake and effectiveness of our case clarification meetings. Recommendations arising from these reviews are being used to help drive continuous improvement.

We refined our capability strategy to suit the hybrid work model. New capability pathways have been added to our traditional program, including an Emerging Leader pathway (for new and emerging leaders), a Think Big pathway (an innovation pathway for high performers) and an Anytime, anywhere pathway (a self-paced e-learning library).

We revised our wellbeing program so that it's more responsive and reflective of staff needs. We shifted from an annual calendar of events to a three-monthly rapid delivery model, to ensure the program could respond as needed in line with our pulse checks.

We delivered a wide range of wellbeing initiatives, including more Employee Assistance Program sessions for staff and their immediate families, an online wellbeing knowledge hub, a wellbeing guest speaker series, physical health initiatives, mental health first aid certification for peer and manager support, and positive psychology and resilience workshops. 69% of staff reported feeling supported in their work/life balance and 82% said they felt positive about managing their workload (up from 45% in the previous year).

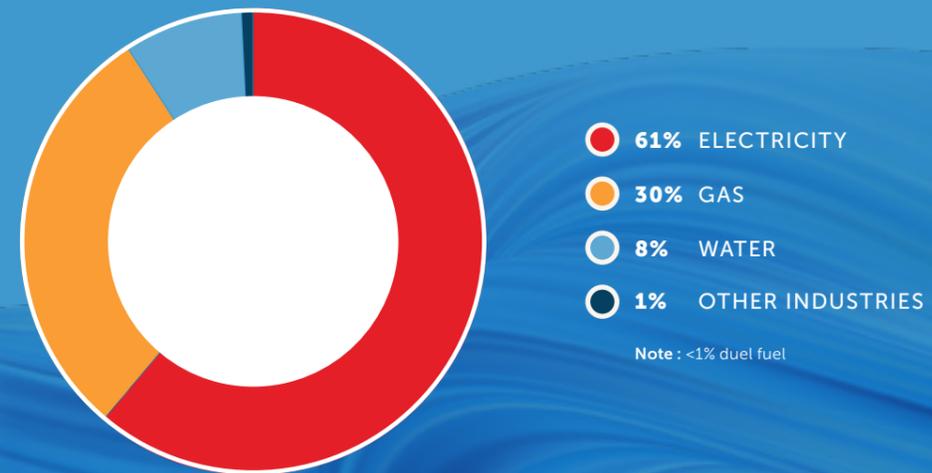
As we repositioned our systems and processes to suit a hybrid way of working, we revised our internal communications channels. Working with the Communications and Policy Team, we delivered regular content in our intranet, Emerald City, under themes relevant to different departmental needs. We also created a number of alternative communication channels to help staff stay up-to-date less formally, including Microsoft Teams chat channels and an operational knowledge-sharing hub on SPARX.

ORGANISATIONAL STRUCTURE AT 30 JUNE 2022



CASES RECEIVED AND WHO LODGED THEM

16,038
TOTAL CASES
↓ 18%



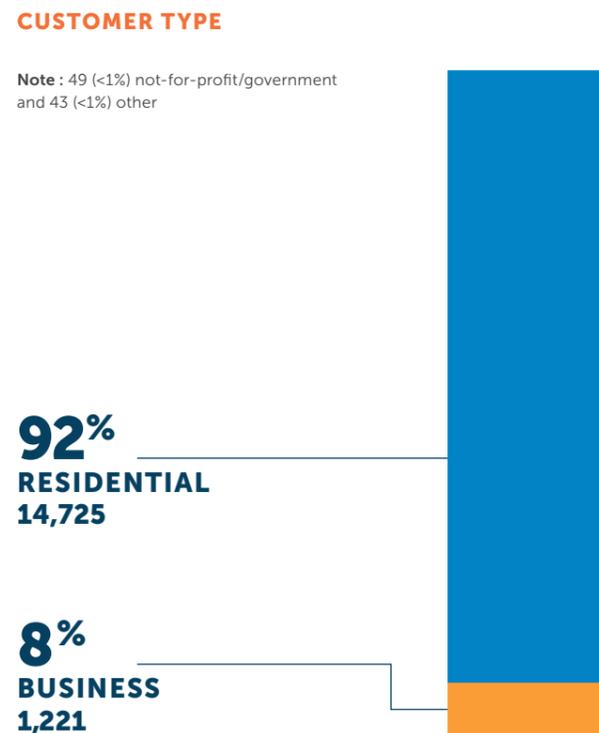
LOCATION

Note: 64 (<1%) from outside Victoria

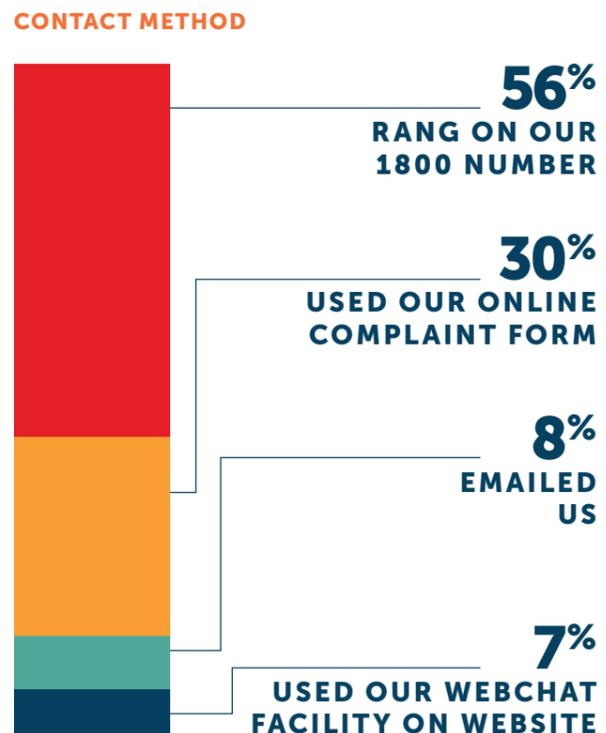


CUSTOMER TYPE

Note: 49 (<1%) not-for-profit/government and 43 (<1%) other



CONTACT METHOD

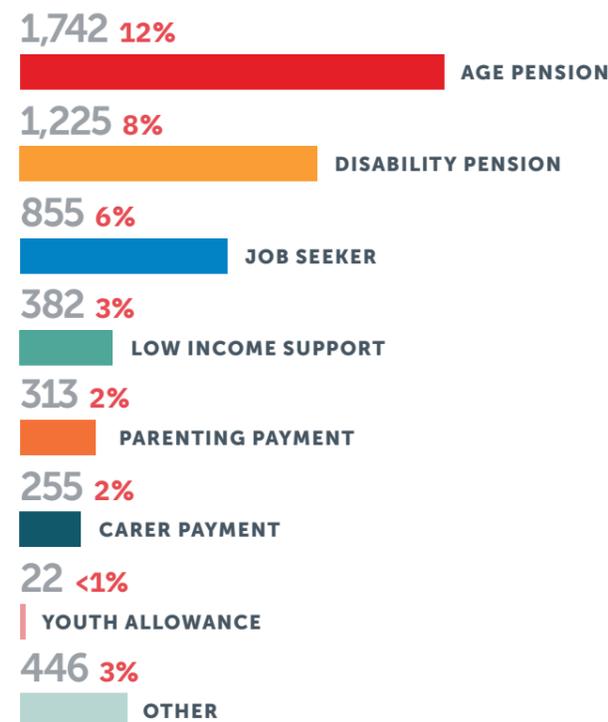


5,240
RESIDENTIAL CUSTOMERS IDENTIFIED AS CONCESSION CARD HOLDERS

315
RESIDENTIAL CUSTOMERS IDENTIFIED AS ABORIGINAL OR TORRES STRAIT ISLANDER

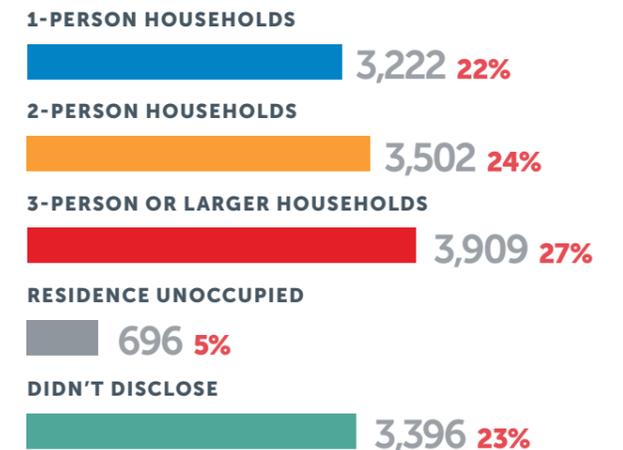
Note: Percentages are rounded to the nearest whole number, so may not always add to 100%.

CONCESSIONS

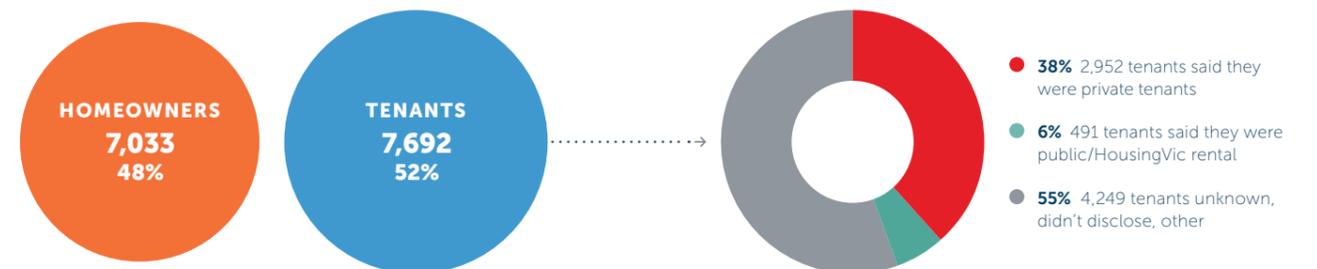


Note: 7,918 (54%) didn't hold a concession card and 1,567 (11%) unknown or didn't disclose

HOUSEHOLD SIZE



OWNING VS RENTING



Note: Percentages are rounded to the nearest whole number, so may not always add to 100%.

DISPUTE RESOLUTION PROCESSES AND OUTCOMES

OUR OVERALL APPROACH TO DISPUTE RESOLUTION

We make sure each party to the complaint has a fair opportunity to explain their perspective and understand the issues and each other's point of view. The company is given an opportunity to offer a resolution that takes account of the customer's situation. Then, without taking sides, we work towards agreement on a resolution and what needs to be done to achieve it. Our aim is to reach a fair and reasonable outcome as quickly as possible. This outcome may be achieved directly between the customer and the company, or it may be conciliated by us.

AT FIRST CONTACT

Case covers all customer contacts with EWOV – registered as either an 'enquiry' or a 'complaint'.

- An **enquiry** is a request for information.
- A **complaint** is an expression of dissatisfaction about a policy, a practice, or the customer service performance of an energy or water company or an embedded network entity that's an EWOV scheme participant – where a response or resolution is explicitly or implicitly expected.

When a customer first contacts EWOV, we assess:

1. whether we have jurisdiction under the *EWOV Charter* to deal with their issue
2. whether the contact is an enquiry or a complaint
3. how many contacts the customer has had with the company, how they did that, and with whom they spoke.

From this assessment, we decide whether to register the case as an Enquiry, an Unassisted Referral, an Assisted Referral, or an Investigation. The bar chart on this page shows how we registered the 16,038 cases we received.

HOW WE RESPONDED TO ENQUIRIES

An Enquiry is a request of us for general information. Where we can, we provide the information ourselves. Where we can't, we provide the customer with contact information for the most appropriate other body.

INFORMATION REQUESTS

We gave 92 customers (12%) information and referred them back to their energy or water company.

We helped 209 people (26%) with general information.

REFERRALS

Where a customer contacts us and we can't help them directly, we advise them who can help and why, and we offer to send the complaint directly on to the other body, with the customer's permission.

We referred 304 (38%) to a regulator – many of these were solar Enquiries referred to Consumer Affairs Victoria.

We referred 92 customers (12%) to another ombudsman.

We referred 15 people (2%) to government or a member of parliament.

We referred 41 people (5%) to another body.

The chart on this page shows the Enquiries we registered for each industry.

HOW WE HANDLED UNASSISTED REFERRALS

Before we can register a case as a complaint, the customer must give the company the opportunity to address the problem. In most cases where the customer hasn't done that, we register the case as an Unassisted Referral and refer the customer back to the company's call centre.

2,113 complaints were closed as Unassisted Referrals. 1,005 customers (48%) were referred to their company's call centre and 71 customers (3%) were referred to a regulator. 560 customers (27%) were provided with general information. We closed 477 complaints (23%) because there was insufficient information to take the matter further.

The chart below shows the Unassisted Referrals we registered for each industry.

HOW WE HANDLED ASSISTED REFERRALS

If a customer has contacted the company at least once and their issue remains unresolved, we register the complaint as an Assisted Referral. We provide the customer with information about their rights and responsibilities, and we arrange for a designated higher-level person within the company to contact them.

The customer can return to EWOV if the Assisted Referral doesn't resolve the complaint for them. Four weeks after the Assisted Referral, we send them a reminder SMS asking them to contact us again if the complaint isn't resolved.

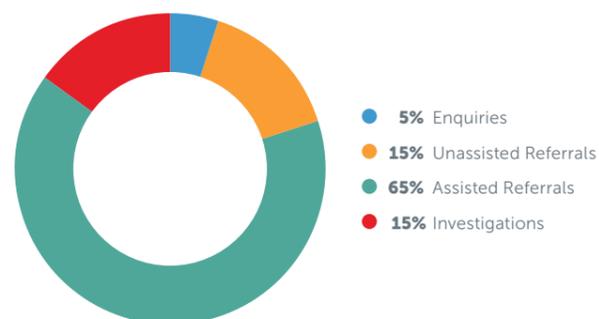
After an Assisted Referral from EWOV, the company has three business days to contact the customer. It has a total of 15 business days to investigate the complaint and undertake any necessary actions. Common reasons for customers returning to EWOV are no contact by the company, contact outside the required timeframes, and an offer that doesn't resolve the complaint to their satisfaction.

We closed 8,863 complaints at this level, when the customer's complaint was resolved by the company, or the customer didn't return to us.

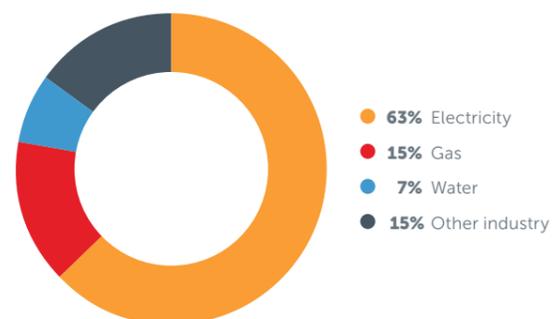
Where the customer returned to EWOV still dissatisfied with how the company responded to their complaint, we opened an Investigation. 15% of Assisted Referrals progressed to Investigation, with 26 days the average time between the Assisted Referral and the Investigation (down from 30 days in 2020-21).

The chart below shows the Assisted Referrals we registered for each industry.

CASES BY STAGES IN 2021-22 (16,038)

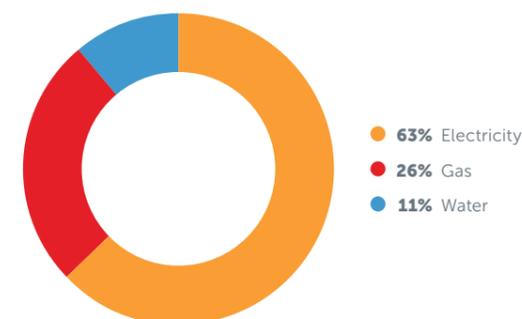


ENQUIRIES BY INDUSTRY



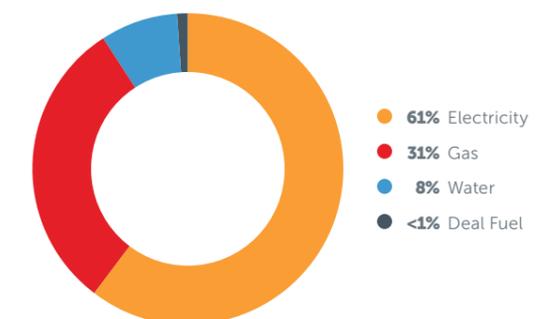
UNASSISTED REFERRALS BY INDUSTRY

In 2021-22, **2,455** complaints were registered at Unassisted Referral:



ASSISTED REFERRALS BY INDUSTRY

In 2021-22, **10,467** complaints were registered at Assisted Referral:



HOW WE HANDLED INVESTIGATIONS

If a customer returns to EWOV because an Assisted Referral to a higher-level contact hasn't resolved their complaint for them, we review the complaint again for jurisdiction before we open an Investigation. Sometimes we bypass Assisted Referral and move directly to Investigation. We do this where we assess a complaint as being complex and unlikely to be resolved by referral, where the customer's circumstances reflect EWOV's *Vulnerable and Disadvantaged Customer Policy and Procedure*, and/or where an energy or water company requests an Investigation.

The chart below shows the Investigations we opened in each industry.

INVESTIGATIONS OPENED BY INDUSTRY

ELECTRICITY

1,446

GAS

713

WATER

180

MONETARY OUTCOMES FROM EWOV INVESTIGATIONS

The bar chart below shows that, from EWOV Investigations, companies provided \$1,541,815 in billing adjustments, service payments and debt waivers. We also finalised 160 'wrongful disconnection' assessments, from which 67 payments were made by energy retailers. These totalled \$126,064, with customers receiving an average of \$1,882.

\$1,541,815
WAS PROVIDED BY COMPANIES
TO CUSTOMERS AS A RESULT OF
EWOV INVESTIGATIONS

MONETARY OUTCOMES FROM EWOV INVESTIGATIONS

From EWOV Investigations, \$1,541,815 was provided by companies to customers:

BILLING ADJUSTMENTS

\$730,987

DEBT REDUCTIONS / WAIVERS

\$408,645

RECOGNITION OF CUSTOMER

\$379,252

WAIVED FEES

\$12,855

GUARANTEED SERVICE LEVEL

\$10,076

INVESTIGATION STAGES AND UPGRADES

An Investigation may resolve at Stage 1, Stage 2, Stage 3 or Final Stage depending on its complexity and whether the complaint has been upgraded under EWOV's *Complaint Upgrade Policy*.

The complaint upgrade process — with its additional costs for the company — helps ensure that companies provide EWOV with timely, accurate and appropriate responses that assist resolution.

We may also upgrade a complaint if we assess that a company's suggestion for resolution is inappropriate or inadequate, or if the company disconnects or restricts supply, pursues debt collection activity, or contacts the customer about the issue during our Investigation.

STAGE 1 INVESTIGATIONS

A Stage 1 Investigation is one that we think can be resolved within 28 business days and two responses, because it doesn't require detailed information, action or analysis by us, the company or the customer. To provide faster information flows, we may gather a company's Stage 1 complaints into a 'batch' and schedule a meeting to go through each complaint. If the complaint isn't resolved promptly, or if the complaint needs to be tested against our fair and reasonable framework, it's upgraded.

We closed 827 Investigations at Stage 1 — 794 of them (96%) conciliated. A further 30 (4%) were closed because the customer disengaged from our process.

We upgraded 79 Investigations to Stage 2 — 50 electricity, 21 gas and 8 water.

STAGE 2 INVESTIGATIONS

A Stage 2 Investigation requires more detailed information, action or analysis by us, the company, or the customer. The company has 10 business days to provide us with a response, which we review and discuss with the customer. We then work with the customer and the company to reach a fair and reasonable outcome.

We closed 1,343 Investigations at Stage 2. We conciliated 877 of these Investigations (65%).

A further 27 Investigations were closed after a formal fair and reasonable assessment of the company's offer to the customer. And 439 Investigations were assessed as more appropriately dealt with by another body, or closed because the customer disengaged from the resolution process.

We upgraded 198 Investigations to Stage 3 — 119 electricity, 53 gas and 26 water.

STAGE 3 INVESTIGATIONS

We closed 153 Investigations at Stage 3. We conciliated 117 of these Investigations (76%).

A further 36 Investigations were assessed as more appropriately dealt with by another body, or closed because the customer disengaged from the resolution process.

We upgraded 44 Investigations to Final Stage — 27 electricity, 14 gas and 3 water.

FINAL STAGE INVESTIGATIONS

We aim to finalise a complaint at Final Stage within 90 days — by negotiating an outcome, closing the complaint on the basis that a fair and reasonable offer has been made by the company, or referring the matter to the Ombudsman for a decision. A Binding Decision is binding on the company if the customer accepts it. It's not binding on the customer, who can choose to pursue the complaint in another forum, such as a court.

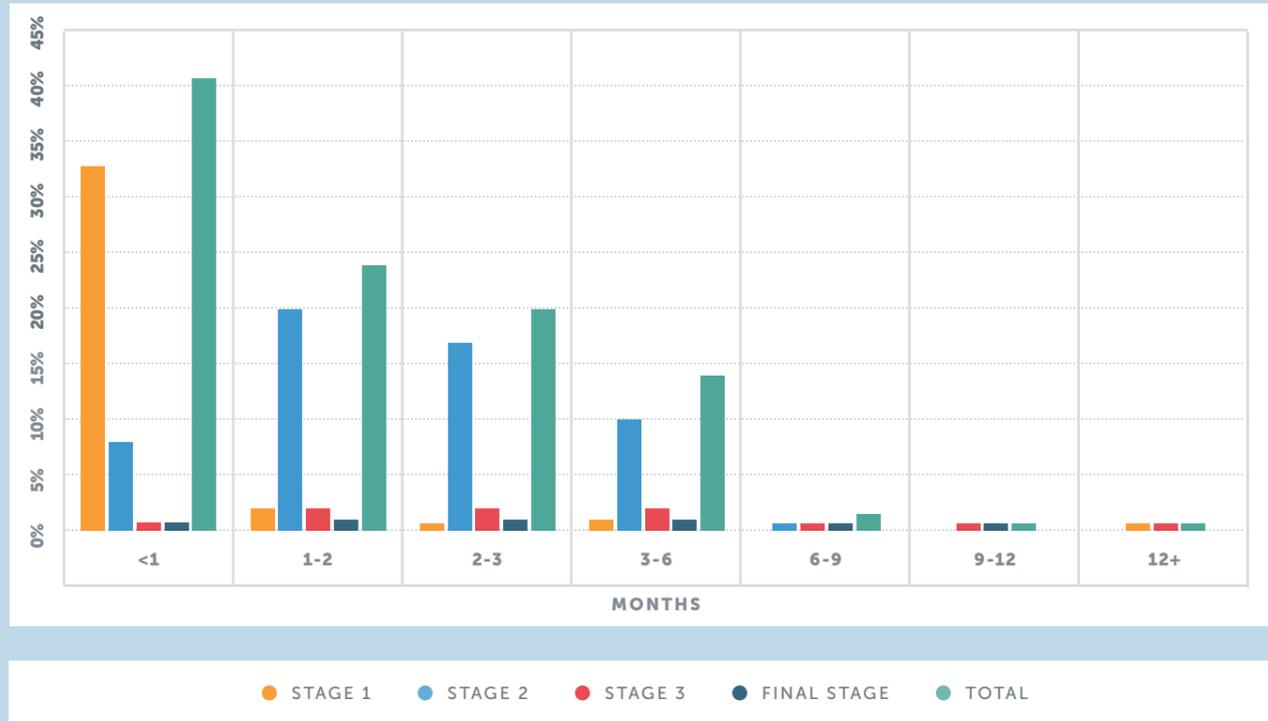
We closed 52 Investigations at Final Stage. We conciliated 44 of these Investigations (85%).

A further 8 Investigations (15%) were closed because the customer disengaged from the resolution process. No Binding Decisions were made.

The charts on page 26 show timeframes for EWOV Investigations, by stages and by industry.

INVESTIGATION TIMEFRAMES

BY STAGES



We aim to finalise our complaints within 90 days

BY INDUSTRY



ISSUES AND TRENDS

EWOV USES TEN HIGH-LEVEL ISSUES CATEGORIES

Our public reporting is on the basis of 'one case – one issue', that being the main issue the customer raises when they contact us.

BILLING

Generating bills, sending bills, payment processes

CREDIT

Unpaid bills and the action taken by energy and water companies to collect arrears

CUSTOMER SERVICE

The level of service received or not received

LAND

How company activities or network assets affect a customer's property

MARKETING

How electricity and gas retailers go about gaining new customers

PRIVACY

How a customer's personal information is handled

PROVISION

Connection of a property to an energy or water network

SUPPLY

Physical delivery of the electricity, gas or water service

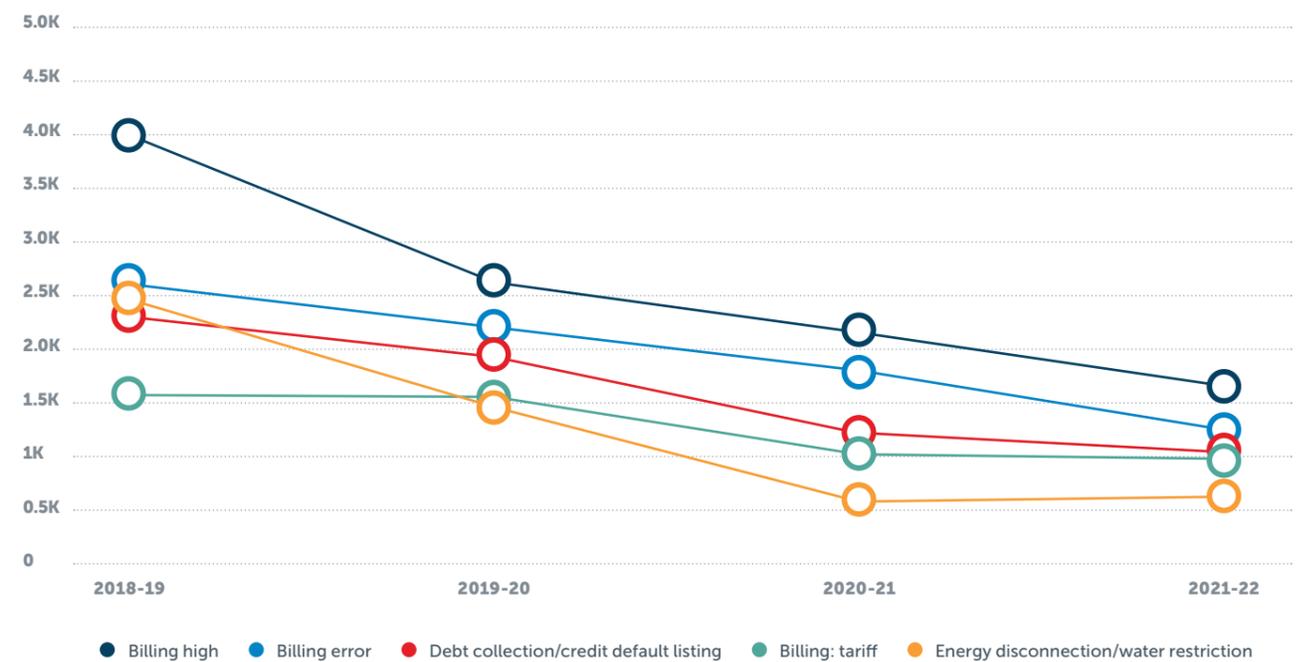
TRANSFER

Switching an electricity or gas account to another energy retailer

GENERAL ENQUIRY

Cases that don't fit under another category

TRACKING COMMON SUB-ISSUES OVERALL OVER 5 YEARS



TOP 5 SUB-ISSUES FOR 2021-22

OVERALL

1. Billing: high
2. Billing: error
3. Provision: existing connection
4. Credit: debt collection/ credit default listing
5. Billing: tariff

ELECTRICITY

1. Billing: tariff
2. Provision: existing connection
3. Supply: unplanned outage
4. Billing: high
5. Billing: error

GAS

1. Billing: high
2. Billing: error
3. Billing: estimation
4. Credit: debt collection/ credit default listing
5. Provision: existing connection

WATER

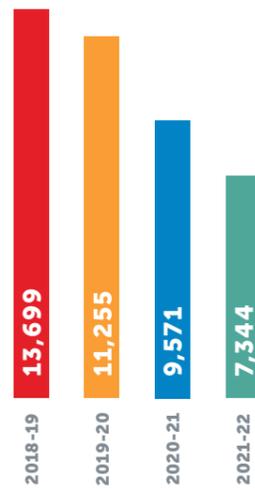
1. Billing: high
2. Land: network assets
3. Billing: fees & charges
4. Billing: error
5. Land: property damage

BILLING

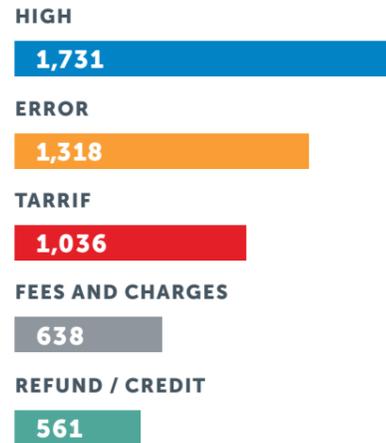
BILLING
GENERATING BILLS, SENDING
BILLS, PAYMENT PROCESSES

COMMON SUB-ISSUES
TARIFF, HIGH, ERROR,
FEES & CHARGES

5 YEAR HISTORY



TOP SUB-ISSUES



TRENDS IN BILLING CASES

▼ **23%**
7,344
BILLING CASES

EWOV received 7,344 billing cases in 2021-22:

- 56% electricity – most commonly about tariffs, high bills, billing errors
- 35% gas – most commonly about high bills, billing errors, estimation
- 9% water – most commonly about high bills, fees & charges, billing errors

Against 2020-21, billing cases were down 23% (and down 46% from four years ago):

- Electricity billing cases were down 25%
- Gas billing cases were down 23%
- Water billing cases were down 13%

We identified 6 billing issues as systemic, some of them listed below:

- Maximum demand presented incorrectly *SI/2021/2*
- Billing above the Victorian Default Offer *SI/2021/67*
- Multiplier on certain meters *SI/2021/29*
- Daylight savings and time of use *EWOV/2022/5196*
- Overbilling of large water customers due to incorrect meter settings *EWOV/2022/6236*

For more information on systemic issues see pages 50 and 51.

CASE STUDY

HIGH BILLS DUE TO METER MIX-UP DISABILITY PENSIONER | METERS AT ADJOINING UNITS

Alex contacted EWOV on behalf of their daughter, a disability pensioner. After two unusually high bills, Alex wondered whether there might be something wrong with the electricity meter at their daughter's unit. As a test, they'd turned the meter off at the mains. They found it was still recording, but the meter for the unit next door wasn't.

Alex said the higher bills started after the tenant next door moved out and a family moved in. The electricity retailer's response was that their daughter must have given the wrong meter number on moving in two years earlier. The electricity distributor sent them back to the retailer. Worried about more high bills, and because their daughter now was concerned about using the heating, Alex contacted EWOV.

We registered the complaint as an Assisted Referral. Alex came back to us saying the retailer had advised the meters were now labelled correctly. But the next bill was still very high, showed the previous meter number, and included a charge of \$445 for a meter investigation. Alex said they questioned it and were simply told the billing was correct.

We opened an Investigation. The retailer responded saying the distributor had confirmed that the meters for the adjoining units had been mixed up. The bills based on the wrong meter were cancelled and re-billed correctly. The resulting credit of \$1,990.94 was paid to their daughter's bank account. Alex was satisfied with the outcome. The complaint was closed. *2021/12615*

CASE STUDY

BROKEN WATER PIPE LEADS TO DISPUTED HIGH BILL **RESIDENTIAL TENANT | HIGH BILL | APPLICATION OF LEAK ALLOWANCE**

After leaving their rented property, Lee received a final bill for \$2,041.30. Lee queried the bill, and it was established that it was high because of water leaking out of a broken water pipe. Lee's water corporation assisted with a water leak allowance of \$1,048.35, which left Lee owing \$992.95. With bills usually around \$140, Lee was unhappy at having to pay so much more.

At Assisted Referral, the water corporation told Lee that in cases of an undetectable leak it can provide a bill rebate of up to 50% of the estimated water lost, and this had been applied to the bill already. It said Lee, as the account holder, would have to pay the balance. It said that a property owner is responsible for maintaining the property's pipes and fixtures, and suggested Lee contact the landlord to ask them

to pay the remainder of their water bill. It also noted that recent legislative changes enable tenants to seek reimbursement from landlords, but any such reimbursement is a matter between the tenant and the landlord.

Dissatisfied with this response, Lee came back to EWOV. Our Investigation confirmed the water corporation's advice and its correct application of the High Usage Leak Allowance in line with Victorian Water Industry Guidelines. The water corporation offered Lee a payment plan. Lee was satisfied with the outcome and understood they could pursue further reimbursement from the landlord as permitted by legislation. The complaint was closed. 2021/11844



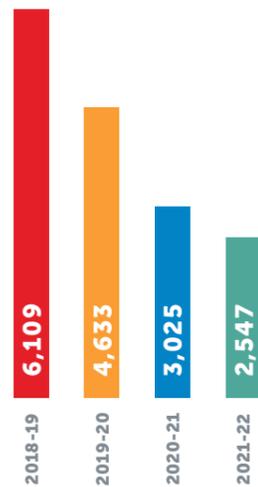
The water corporation told Lee that in cases of an undetectable leak it can provide a bill rebate of up to 50% of the estimated water lost

CREDIT

CREDIT
UNPAID BILLS AND THE
ACTION TAKEN BY ENERGY
AND WATER COMPANIES
TO COLLECT ARREARS

COMMON SUB-ISSUES
DEBT COLLECTION/
CREDIT DEFAULT LISTING,
PAYMENT DIFFICULTIES,
DISCONNECTION

5 YEAR HISTORY



TOP SUB-ISSUES

COLLECTION

1,093

PAYMENT DIFFICULTIES

749

DISCONNECTION / RESTRICTION

701

DELIVERIES STOPPED

4

TRENDS IN CREDIT CASES

EWOV received 2,547 credit cases in 2021-22:

- 60% electricity
- 35% gas
- 4% water

In all three industries, debt collection/credit default listing was the most common sub-issue.

Against 2020-21, credit cases were down 16% (and down 58% from four years ago):

- Electricity credit cases were down 16%
- Gas credit cases were down 16%
- Water credit cases were down 14%

We identified 9 credit issues as systemic:

- Missing information on payment assistance letters *SI/2018/49*
- Disconnections during pandemic *SI/2021/43*
- Less communication before debt collection *SI/2021/48*
- Payment arrangements cancelled after early payments through Centrepay *EWOV/2022/6380*

For more information on systemic issues see pages 50 and 51.

▼ 16%
2,547
CREDIT CASES

CASE STUDY

SOLAR POWER NEEDS SOLAR METERING

RESIDENTIAL CUSTOMER | IMMINENT DISCONNECTION | ACCURACY OF BILLS

Blake contacted EWOV because they owed \$1,095.60 for electricity and had received a notice of imminent disconnection. The debt came about because while Blake's property had solar, they also had an analogue meter. This set-up caused the meter to spin backwards, so the meter had to be read manually. Blake said they started receiving estimated bills during 2020, despite providing access for meter reading. They hadn't paid these bills because they disagreed that the bills should need to be estimated. Blake said the retailer wanted them to agree to the installation of a smart meter, but they didn't want to do this due to health concerns linked to electromagnetic frequencies.

Our Investigation of the complaint included consideration of a review by EWOV's technical advisor, health concerns, laws and codes, industry practice and

similar case results. We drew on these aspects to assess whether the retailer's position, and response to Blake's concerns about upgrading the meter to a smart meter were fair and reasonable in the circumstances.

To assess industry practice in this type of situation, we contacted three other energy retailers with a de-identified summary of the complaint, asking how they would handle it. All three said that, under the *National Meter Rules*, a customer installing solar should also install a meter that works with solar. None of the three would accept customer readings from a meter that was spinning backwards. We assessed that the retailer's position was consistent with the three responses provided to EWOV.

EWOV's technical advisor reviewed the complaint and confirmed that clause 7.8.2 (a) (7) of the *National Electricity Rules* requires that distributors install a bi-directional electricity meter

at any site with solar panels, and that an analogue meter isn't bi-directional. They also said that the distributor may be able to 'defect' the site and switch the system off.

Our review of similar EWOV complaints about similar issues, showed that the retailer's position was consistent with outcomes of those complaints.

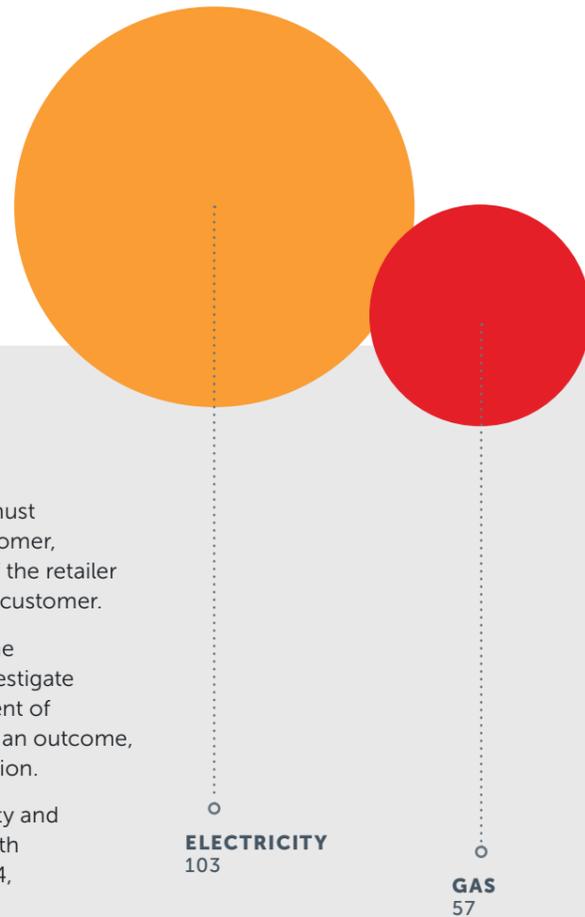
We acknowledged Blake's wish to keep the analogue meter. But, for the system to be compliant with current rules and regulations – and for the electricity usage to be recorded accurately – they would need to upgrade to a smart meter.

In line with EWOV's *Fair and Reasonable Investigation Framework*, we decided to close Blake's complaint because we assessed that the retailer had made a fair and reasonable offer of a credit of \$409.99 for missed pay-on-time discounts and was estimating Blake's bills only because of the non-compliant metering. 2021/2525



160

WDP ASSESSMENTS FINALISED



ASSESSING WHETHER AN ELECTRICITY OR GAS DISCONNECTION WAS 'WRONGFUL'

Before disconnecting electricity or gas supply, an energy retailer must comply with the terms and conditions of its contract with the customer, and with the requirements of the Energy Retail Code of Practice. If the retailer doesn't, a Wrongful Disconnection Payment (WDP) is payable to a customer.

The payment is \$500 a day (or part thereof), capped at \$3,500 if the customer doesn't contact the retailer within 14 days. When we investigate an energy disconnection complaint, we make a separate assessment of whether a WDP is payable. If the retailer and EWOV can't agree on an outcome, we request a formal decision from the Essential Services Commission.

In 2021-22, we finalised 160 WDP assessments, 103 (64%) electricity and 57 (36%) gas. From these, 67 WDPs were paid, including 27 paid with no admission of breach by the retailer. The total paid was \$126,064, with an average of \$1,882 per customer.

OUTCOMES OF WDP ASSESSMENTS CLOSED

WDP NOT PAYABLE



WDP PAYABLE



WDP NOT APPLICABLE



WDP PAID - NO ADMISSION OF BREACH BY RETAILER



CASE NOT WITH DISCONNECTING RETAILER



CASE STUDY

CUSTOMER WITH VERY HIGH ARREARS OFFERED A DEBT WAIVER TO LEAVE RESIDENTIAL CUSTOMER | DISCONNECTED BEFORE ACCOUNT WAS TRANSFERRED

Paying \$20 a month, Val had gas arrears of \$4,297 and, combined with electricity, total energy arrears of \$9,064.88. Val's gas was disconnected soon after they agreed to switch to another retailer in return for a full waiver of their energy arrears. Val arranged to switch, but the transfer couldn't be completed because the gas had been disconnected.

The energy retailer responded to our Investigation, confirming Val's arrears. It also confirmed its offer of a full waiver if Val switched to another retailer,

and its reconnection condition of \$1,000 upfront. Once Val complained to EWOV this offer conflicted with EWOV's Reconnection/Restriction Policy.

When Val's gas was still not reconnected a week later, the complaint was upgraded to Final Stage under our Complaint Upgrade Policy. Following discussion with both parties, we confirmed to the retailer that Val accepted its offer and understood that the gas reconnection was only for the purpose of enabling account transfer. The retailer agreed to reconnect. The complaint was closed. 2021/14142

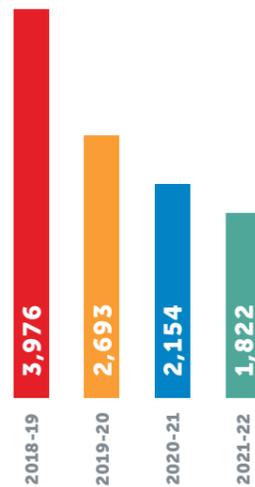
We also opened an Investigation into whether the disconnection of Val's gas was wrongful. Our Investigation found that a wrongful disconnection payment wasn't applicable because, in its disconnection of the gas, the retailer had followed the law. EWOV/2022/0007665.

PROVISION

PROVISION
CONNECTION OF A PROPERTY
TO AN ENERGY OR WATER
NETWORK

COMMON SUB-ISSUES
EXISTING
CONNECTION,
NEW CONNECTION

5 YEAR HISTORY



TOP SUB-ISSUES

EXISTING CONNECTION

1,187

NEW CONNECTION

496

DISCONNECTION / RESTRICTION

133

DELIVERIES STOPPED

6

TRENDS IN PROVISION CASES

EWOV received 1,822 provision cases in 2021-22:

- 69% electricity
- 25% gas
- 5% water

In all three industries, provision at an existing connection was the most common sub-issue. This was likely COVID-19-related, with customers in lockdown concerned about the duration and inconvenience of scheduled outages for maintenance and new customer connections, even where notice was given.

Against 2020-21, provision cases were down 15% (and down 54% from four years ago):

- Electricity provision cases were down 13%
- Gas provision cases were down 19%
- Water provision cases were down 26%

▼ **15%**
1,822
PROVISION CASES

CASE STUDY

RESPONSIBILITY FOR LOST RENTAL INCOME

SMALL BUSINESS | METER RELOCATION DELAYS | FAIR AND REASONABLE ASSESSMENT TRANSFERRED

Wanting to make changes within their shop/residence property, Danny requested the relocation of the electricity meters. After emailing the request form to the retailer, Danny's electrician found out it had to be lodged online. All up, it took four months to get the works completed. The delays were due to a combination of factors – the need to submit amended paperwork, the distributor having to move the supply line to a different location, Danny's electrician installing the wrong meter, and then the meter failing an inspection.

Danny was seeking compensation for the loss of \$1,734 in monthly rental income, for poor customer service, and for significant stress. The retailer offered \$1,240.40 (\$1,040.40 for loss of rental income and a \$200 customer service payment).

Our Investigation concluded that the retailer had addressed each aspect of Danny's complaint on a fair and reasonable basis. We found that the retailer was responsible for a delay of 18 days, which equated to loss of rent of \$1,026.18. This was less than the amount offered by the retailer. Having listened to the call recordings between Danny and the retailer, we agreed with the retailer's offer of a customer service payment of \$200.

EWOV doesn't investigate claims for injuries to a customer's psychological or emotional state, but we provided Danny with information on how they might make a claim through other processes. 2021/8232

SUPPLY

SUPPLY
PHYSICAL DELIVERY
OF THE ELECTRICITY,
GAS OR WATER SERVICE

COMMON SUB-ISSUES
UNPLANNED OUTAGE,
PLANNED OUTAGE,
VARIATION

5 YEAR HISTORY



TOP SUB-ISSUES

OFF SUPPLY - UNPLANNED

828

OFF SUPPLY - PLANNED

215

VARIATION

155

QUALITY

112

SEWER / STORMWATER OVERFLOW

24

TRENDS IN SUPPLY CASES

EWOV received 1,339 supply cases in 2021-22:

- 85% electricity – most commonly about unplanned outages (largely due to storm activity in October 2021), planned outages, variations in supply
- 7% gas – most commonly about supply quality
- 8% water – most commonly about water quality

Against 2020-21, supply cases were up 9% (and up 5% from four years ago):

- Electricity supply cases were up 29%
- Gas supply cases were down 55%
- Water supply cases were down 21%

We identified 1 supply issue as systemic:

- Low gas pressure supply during winter months S1/2021/49

For more information on systemic issues see pages 50 and 51.

▲ **9%**
1,339
SUPPLY CASES

CASE STUDY

SEEKING COMPENSATION FOR OUTLAYS TO DEAL WITH PLANNED OUTAGE

BUSINESS CUSTOMER | LOSS LINKED TO PLANNED OUTAGES DURING COVID-19 LOCKDOWN

Faced with a planned power outage, Gus hired a generator and paid an electrician to connect it to keep their business running. When the generator couldn't be connected by opening time, Gus had to cancel bookings. Gus said it cost them around \$4,000. Faced with a second planned outage, and business stresses due to COVID-19 lockdowns, Gus contacted EWOV seeking compensation.

After an Assisted Referral, Gus returned saying the distributor maintained the works were essential. It also told Gus the business should have plans in place to deal with power outages.

Responding to our Investigation, the distributor said the two outages were needed to connect a new customer. It showed it had sent Gus the correct notification for each outage, as well as two SMS reminders each time. It said business customers need to plan for electricity outages, and that it doesn't offer compensation unless the outage causes damage to property or appliances.

We confirmed to Gus that the distributor's actions were in line with its rights under the *Electricity Distribution Code of Practice* – it may interrupt supply for planned maintenance, repair, or system augmentation [5.3] with at least 4 business days' written notice of the interruption [5.5.1 (a)]. We also highlighted the Code requirement that a business customer must take reasonable precautions to minimise risk of loss or damage to its equipment, premises or business [16 (c)].

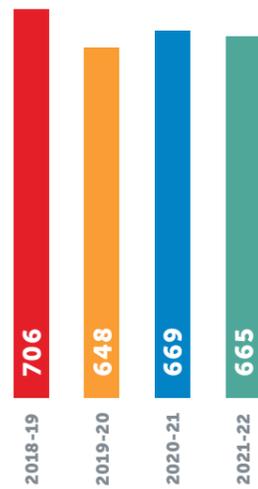
While not happy with the Investigation outcome, Gus said they understood the Code provisions. 2021/9580

LAND

LAND
HOW COMPANY ACTIVITIES
OR NETWORK ASSETS AFFECT
A CUSTOMER'S PROPERTY

COMMON SUB-ISSUES
NETWORK ASSETS,
PROPERTY DAMAGE,
VEGETATION MANAGEMENT

5 YEAR HISTORY



TOP SUB-ISSUES

NETWORK ASSETS

316

PROPERTY DAMAGE

199

VEGETATION MANAGEMENT

83

OTHER

31

EASEMENT

28

TRENDS IN LAND CASES

EWOV received 665 land cases in 2021-22:

- 43% electricity, most commonly about network assets, vegetation management
- 14% gas, most commonly about property damage, network assets
- 43% water, most commonly about network assets, property damage

Against 2020-21, land cases were down 1% (and down 6% from four years ago):

- Electricity land cases were down 9%
- Gas land cases were down 4%
- Water land cases were up 12%

▼ 1%

665

LAND CASES

CASE STUDY

GETTING RID OF THE SMELL OF SEWAGE

RESIDENTIAL CUSTOMER | PLACEMENT OF NETWORK ASSETS

Chris complained that the smell of sewage from a vent attached to the water corporation's sewer main was all through their home. Chris said that, without notice during lockdown, the water corporation had allowed the developer of a new housing development to move a vent from beside its own property to beside their home.

Responding to our Investigation, the water corporation said it had tested the developer's pipework but found no leaks. To gather more information, it was using odour sensors in the sewers and around the vent. It was also reviewing whether the vent was suitable, installed correctly and working properly.

To assist our Investigation, we asked the local council for a health inspection of the property. This confirmed the smell as sewage. The developer was given a month to fix it. As a temporary measure, the water corporation capped the vent. Chris advised that the smell stopped the day the vent was capped. The complaint was closed on this basis.

A month later, Chris came back asking us to reopen our Investigation because they couldn't get information from the water corporation about a permanent solution. Given EWOV's experience that planning and decision-making processes in matters of this kind can be lengthy — and because we were satisfied the water corporation was progressing the matter reasonably — we declined Chris' request. Chris disagreed with our decision.

At our request, the water corporation committed to sending Chris fortnightly updates. It also revisited with Chris its process for claims for compensation. 2021/10040

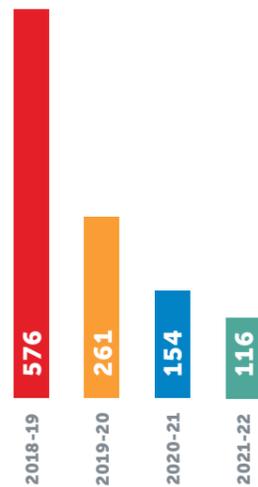
To assist our Investigation, we asked the local council for a health inspection of the property

MARKETING

MARKETING
HOW ELECTRICITY AND GAS RETAILERS GO ABOUT GAINING NEW CUSTOMERS

COMMON SUB-ISSUES
MISLEADING, PRESSURE SALES, INFORMATION

5 YEAR HISTORY



TOP SUB-ISSUES

PHONE

54

OTHER SALES CHANNELS

50

DOOR TO DOOR

12

TRENDS IN MARKETING CASES

EWOV received 116 marketing cases in 2021-22:

- 82% electricity
- 13% gas
- 5% other (mostly about energy saving initiatives)

Overall, the most common energy marketing sub-issue was phone marketing.

Against 2020-21, marketing cases were down 25% (and down 80% from four years ago):

- Electricity marketing cases were down 23%
- Gas marketing cases were down 50%

We identified two marketing issues as systemic:

- Exempt seller not meeting obligations SI/2021/11
- Another exempt seller misses obligations SI/2021/16

For more information on systemic issues see pages 50 and 51.

▼ 25%

116

MARKETING CASES

CASE STUDY

BILLS DIDN'T REFLECT WEBSITE INFORMATION

RESIDENTIAL CUSTOMER | SOLAR TARIFF RATES

Jerry said that they signed up to a single-rate solar tariff based on information on their retailer's website. After installing solar, their first bill showed they were on a Time of Use (TOU) tariff. We provided Jerry with an Assisted Referral to a higher-level contact within the retailer. Jerry said they were first told that their previous single-rate tariff could be restored, but then they were told it couldn't be. The retailer offered an account credit. Their next bill was based on the TOU tariff again. Jerry was concerned the solar contract and marketing was misleading from the beginning.

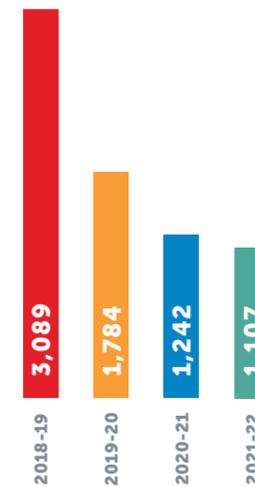
We opened an Investigation. The retailer confirmed that Jerry had signed up to a single-rate tariff. However, when the local electricity distributor configured the meter at their property for solar, the tariff was changed to TOU. It said it had raised a tariff change request with the distributor and, in early October 2021, the distributor had changed Jerry's tariff back to single-rate. It apologised that Jerry's most recent bill was still on TOU. It sent Jerry a new single-rate bill and increased its offer to \$350, which Jerry accepted. Jerry was satisfied with the outcome of our Investigation. The complaint was closed. 2021/11490

TRANSFER

TRANSFER
SWITCHING AN ELECTRICITY OR GAS ACCOUNT TO ANOTHER ENERGY RETAILER

COMMON SUB-ISSUES
CONTRACT TERMS, ERROR, DELAY, WITHOUT CONSENT

5 YEAR HISTORY



TOP SUB-ISSUES

IN ERROR

326

DELAY

241

CONTRACT TERMS

227

WITHOUT CONSENT

155

OBJECTIONS

106

TRENDS IN TRANSFER CASES

EWOV received 1,107 transfer cases in 2022-22:

- 60% electricity, most commonly about contract terms, error
- 40% gas, most commonly about error, delay

Against 2020-21, transfer cases were down 11% (and down 64% from four years ago):

- Electricity transfer cases were down 11%
- Gas transfer cases were also down 11%

▼ 11%

1,107

TRANSFER CASES

CASE STUDY

SEEKING EARLY RELEASE FROM FOUR-YEAR CONTRACT

LARGE ELECTRICITY USER | RETAILER OBJECTION TO TRANSFER

The operations of Darcy's business were severely affected by COVID-19. Darcy was selling the business and wanted to be released from the four-year electricity contract struck in 2019, saying they hadn't agreed to a four-year term. The electricity retailer wouldn't agree to the transfer unless the business paid an early termination fee of just under \$100,000.

Responding to our Investigation, the electricity retailer provided evidence that the signed four-year contract had been emailed to the retailer by the energy broker engaged by Darcy's business. The retailer also provided a copy of a letter of authority between Darcy's business and the energy broker, which confirmed that the broker had the authority to make decisions and had selected the four-year term. The retailer offered Darcy some other options, all of which would require the business to remain with the retailer.

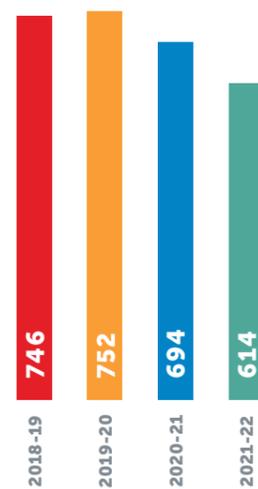
Our Investigation confirmed that the retailer hadn't received any information to indicate that Darcy was either unaware of the four-year period or didn't consent to it. We assessed that the early termination fee was payable if Darcy wanted to close the account before the contract period ended. We advised Darcy to contact the energy broker directly if they were concerned about how it had acted on behalf of their business. The complaint was closed.

2021/8339

CUSTOMER SERVICE

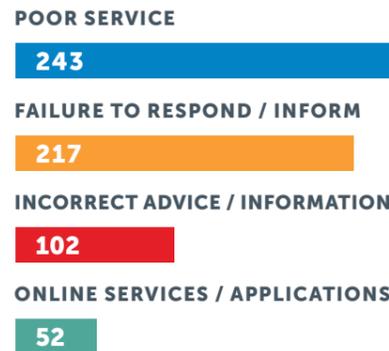
CUSTOMER SERVICE
THE LEVEL OF
SERVICE RECEIVED
OR NOT RECEIVED

5 YEAR HISTORY



COMMON SUB-ISSUES
POOR SERVICE, FAILURE TO
RESPOND/INFORM, INCORRECT
ADVICE OR INFORMATION

TOP SUB-ISSUES



TRENDS IN CUSTOMER SERVICE CASES

EWOV received 614 customer service cases in 2021-22:

- 67% electricity
- 22% gas
- 9% water

In all three industries, the most common issues were poor service and failure to respond/inform.

Against 2020-21, customer service cases were down 12% (and down 18% from four years ago):

- Electricity customer service cases were down 10%
- Gas customer service cases were down 20%
- Water customer service cases were down 2%

We identified one customer service issue as systemic:

- Complaints allege a retailer wasn't contactable SI/2021/57

For more information on systemic issues see pages 50 and 51.

▼ 12%

614

CUSTOMER SERVICE CASES

CASE STUDY

ARRIVING AT A METER READING COMPROMISE

RESIDENTIAL CUSTOMER | VULNERABILITY | POOR SERVICE

Due to a family violence situation, Jan had increased their home security. As a result, meter readers couldn't get to the home's gas, electricity, and water meters. The water company dealt with this through a device enabling it to read from the boundary, electricity was handled through a smart meter and Jan provided self-reads for gas.

Two years on, the gas retailer wanted access for an actual reading. After appointments were missed, the local gas distributor moved the meter and Jan cut a hole in the fence so it could be read at any time. While this addressed the meter reading issue, Jan was upset by the unprofessional behaviour of the contractors who came out to move the meter.

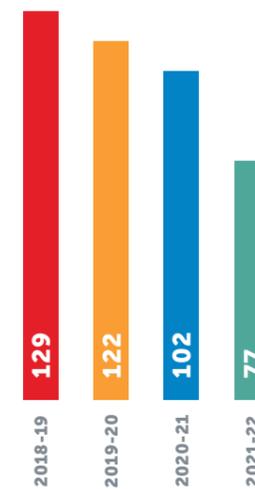
Due to Jan's vulnerable circumstances, we exercised EWOV's discretion to bypass Assisted Referral and move straight to an Investigation. We suggested an EWOV-facilitated three-way video conference as a useful way to address Jan's complaint. Jan and the gas distributor agreed to take part.

The gas distributor apologised for the behaviour of its contractors. It acknowledged that Jan had gone to a lot of trouble and expense to ensure the gas meter could be read, while maintaining the home's security. Agreement was reached on a meter reading process that would meet the needs of both Jan and the meter readers. Jan was satisfied with the resolution. The complaint was closed. 2021/8485

PRIVACY

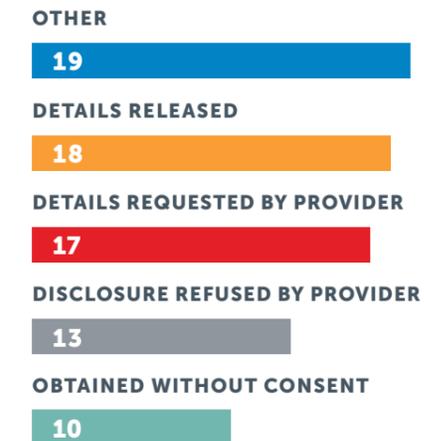
PRIVACY
HOW A CUSTOMER'S
PERSONAL INFORMATION
IS HANDLED

5 YEAR HISTORY



COMMON SUB-ISSUES
DETAILS REQUESTED,
DETAILS RELEASED,
DISCLOSURE REFUSED

TOP SUB-ISSUES



TRENDS IN PRIVACY CASES

EWOV received 77 privacy cases in 2021-22:

- 64% electricity – most commonly about details requested
- 16% gas – most commonly about details released
- 18% water – most commonly about details released

Against 2020-21, privacy cases were down 25% (and down 40% from four years ago):

- Electricity privacy cases were down 23%
- Gas privacy cases were down 50%
- Water privacy cases were up 17%

We identified three privacy issues as systemic:

- Postcard leads to potential privacy breach SI/2020/46
- Privacy measure and concessions SI/2020/43
- Inappropriate third-party customer contact SI/2021/71

For more information on systemic issues see pages 50 and 51.

▼ 25%

77

PRIVACY CASES

CASE STUDY

MISDIRECTED MAIL PUTS SAFETY IN JEOPARDY

DETAILS RELEASED | FAMILY VIOLENCE SITUATION

Ricky had an Apprehended Violence Order (AVO) against their son, who was living in another house Ricky owned. When a letter showing Ricky's current address was sent to the wrong address by the water corporation, the son found out where they were living and came to the property multiple times. Ricky said they feared for their safety, moved out, and put the house up for sale.

The water corporation agreed that its action breached the *Information Privacy Principles* and *Australian Privacy Principles*. It responded by changing the postal address for the water bills and notices and added a password to Ricky's account. It said it had also changed the processes that led to the breach.

Ricky wanted compensation of several hundred thousand dollars, as well as the costs of alternative accommodation, property sale and removalists. The water corporation's offers came in well below this.

To assess good industry practice relevant to the situation, we provided anonymised information about the complaint, and the steps taken so far to address it, to four other EWOV scheme participants (two water and two energy). We considered the information received and shared it with Ricky and the water corporation.

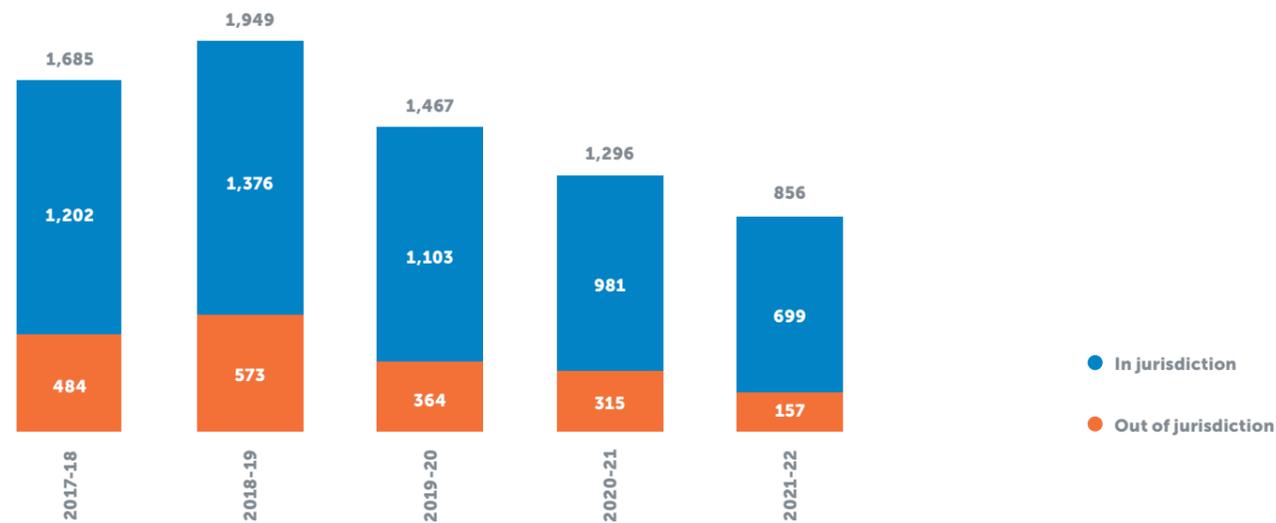
While the water corporation amended its position, adding the offer of several weeks of like-for-like rental accommodation in Ricky's location, it wouldn't offer anything further without the specialist consideration of the Office of the Victorian Information Commissioner (OVIC). Ricky decided to withdraw the EWOV complaint and lodge it with OVIC. Our Investigation was closed. 2021/8053

SOLAR

SOLAR
RELATING TO SOLAR
INSTALLATION BY A
COMPANY THAT IS AN
EWOV SCHEME PARTICIPANT

COMMON SUB-ISSUES
TARIFF, PROVISION
AT AN EXISTING
CONNECTION,
HIGH BILL

5 YEAR HISTORY



TRENDS IN SOLAR CASES

In 2021-22 we registered 856 solar cases, down 34% from 1,296 cases in 2020-21.

We were able to assist with 699 of these cases, which fell within EWOV's jurisdiction because the complaint was about a company which is an EWOV scheme participant. The most common issues were billing and provision.

157 cases fell outside EWOV's jurisdiction, most of these related to solar installers. We referred these customers to Consumer Affairs Victoria.

We registered 425 in-jurisdiction solar **billing** cases. 272 (64%) were about tariffs. 45 (11%) were about high bills.

We registered 175 in-jurisdiction solar **provision** cases. 156 (89%) were about provision at an existing connection.

▼ 34%
856
SOLAR CASES

CASE STUDY

CHANGES IN SOLAR FEED-IN TARIFF BILLING | DELAYED SOLAR CREDITS

In 2020, Max signed a two-year contract with a solar feed-in tariff of 16 cents per kWh. Since then, the tariff had been reduced twice and was currently 7 cents. Max complained about this and questioned how the retailer could reduce it without notice. Max said they'd been sent a copy of the contract, but no explanation. Max wanted the lost credits restored.

Responding to our Investigation of Max's complaint, the retailer pointed out the section in its contract with Max which allowed it to vary the feed-in tariff

because Max wasn't on a fixed rate contract. It also provided evidence of notification to Max of the tariff changes.

We reviewed the terms and conditions of Max's contract and the billing for the period in question. We confirmed the billing was correct and that, as Max's contract wasn't fixed-term, there could be price variations. We also confirmed that written notifications had been sent to Max before the changes were made. We suggested that Max check the Victorian Energy Compare website for other options that may be available to them to maximise solar generation at the property.

The delayed refund Max received for solar credits cleared their electricity account. Acknowledging Max's ongoing dissatisfaction, the retailer agreed that Max could switch to another retailer with no termination fee. When Max didn't respond to EWOV's advice of the retailer's offer, we exercised our discretion under the *EWOV Charter* to close the complaint. 2021/12551



EMBEDDED NETWORK

EMBEDDED NETWORK
GENERATING BILLS, SENDING BILLS, PAYMENT PROCESSES

COMMON SUB-ISSUES
TARIFF, HIGH, ERROR, FEES & CHARGES

EWOV'S EMBEDDED NETWORK JURISDICTION

Caravan parks, retirement villages, apartment blocks and shopping centres are examples of private electricity networks supplying homes or businesses within specific self-contained sites. These are called embedded networks. There are 546 embedded network entities registered with EWOV, providing access to independent dispute resolution for 150,005 customers.

We've been dealing with embedded network complaints since July 2018, under the Victorian Government's General Exemption Order (GEO).

The GEO requires that the legal entity responsible for each embedded network site must be a member of EWOV Limited.

Until recently, those entities were required to list all of their embedded network sites in their initial EWOV Limited membership application and maintain that list throughout their time as a member. To reduce the administrative burden, the requirement to keep an up-to-date list of sites with EWOV has been removed. Entities are still required to keep EWOV updated on the total number of customers across all their sites.

TRENDS IN EMBEDDED NETWORK CASES

In 2021-22, EWOV received 299 embedded network cases, down 47% from 2020-21.

77 cases were registered as Enquiries. 222 cases were registered as Complaints:

- 55 Unassisted Referrals
- 139 Assisted Referrals
- 28 Investigations

BILLING

HIGH

74

ERROR

32

BACKBILL

22

TARIFF

22

▼ 47%

299

EMBEDDED NETWORK CASES

CREDIT

DISCONNECTION

17

DEBT COLLECTION

4

PAYMENT DIFFICULTIES

4

CASE STUDY

BILLED LONG AFTER MOVING OUT TENANT | DISPUTED FINAL BILL

In November 2019, with their friend overseas, Robin put their own name on the electricity account for the friend's property. New tenants moved in January 2020. Robin said a final bill had been requested, but never received. Robin said the retailer now wanted over \$1,700 for electricity for the whole of 2020. Robin said that for the time the account was in their name no bills were received until the disputed backbill.

The embedded network retailer offered to waive \$645.45 of the bill. It also offered a payment

plan of \$15 a fortnight, and support through its hardship program.

Our Investigation showed that all bills were sent to the address provided when the account was set up. We reviewed the written communications from the retailer to Robin, finding they were directed to the same email address Robin used to contact EWOV. Our review of the retailer's notes of calls about the account showed no calls or emails from Robin to cancel the account. We concluded that Robin hadn't cancelled the electricity account in December 2020 as they said they had.

We asked Robin for additional information, including proof that contact was made with the retailer via phone or email to close the account. Robin didn't respond to our request.

On this basis, we exercised our discretion under the *EWOV Charter* to close Robin's complaint. We advised Robin that, with the complaint closed, the retailer would be within its rights to start debt collection action. 2021/8717



SYSTEMIC ISSUES

EWOV'S ROLE

EWOV's systemic issues identification and reporting responsibilities are underpinned by the *EWOV Charter* and the *EWOV Limited Constitution*, regulatory memoranda of understanding and reporting protocols, and the *Benchmarks for Industry-Based Customer Dispute Resolution (CDR Benchmarks)*.

We define a systemic issue as an issue, problem or change in company policy or practice that affects, or has the potential to affect, a number of customers. Some affected customers contact EWOV, and some don't.

Identifying systemic issues from our casework, customer surveys and data analysis enables us to work with the company concerned, to bring about a timely and efficient solution and reduce the potential for more customers to be affected.

In energy, where the issue isn't appropriately addressed by the company, or where the issue highlights a regulatory breach, we formally advise the Essential Services Commission for its further investigation and subsequent action.

In water, we're responsible for investigating the issue and seeking redress for all affected customers, and

then reporting the outcome to the Department of Environment, Land, Water and Planning.

We also report publicly on the systemic issues we've identified, to bring more transparency to industry practices, drive customer service improvements and prevent more complaints.

In September 2021, we published the second edition of *Detect*, EWOV's systemic issues publication. We highlighted, with case studies, systemic issues arising from complaints to EWOV about issues related to solar power and complaints about customer service, systems and processes more generally.

SYSTEMIC ISSUES WE IDENTIFIED AND CLOSED

In 2021-22 we identified and closed 32 systemic issues, 27 energy and 5 water.

BILLING

- Price structure mismatch *SI/2020/48*
- Maximum demand presented incorrectly *SI/2021/2*
- Multiplier on certain meters *SI/2021/29*
- Discrepancy in index reads *SI/2021/1 & SI/2021/46*
- Credit card payments processed twice *SI/2021/37*
- Billing above the Victorian Default Offer *SI/2021/55 & SI/2021/67*
- Payments not applied to customer accounts *SI/2021/68*
- Billing system error leads to hundreds of water backbills *SI/2021/51*
- Daylight savings and time of use *EWOV/2022/5196*
- Title discrepancy leads to overcharging for water *EWOV/2022/5784*
- Incorrect Annual Electricity Concession calculations *EWOV/2022/5981*
- Digital meter trial leads to failed water records *EWOV/2022/5824*

- Overbilling of large water customers due to incorrect meter settings *EWOV/2022/6236*
- Provision of a deemed best offer message on bill or bill summary *EWOV/2022/6377*

CREDIT

- Missing information on payment assistance letters *SI/2018/49*
- Disconnections lead to Essential Services Commission review *SI/2020/59*
- Concession issue in housing complex *SI/2021/32*
- Customers affected by family violence highlight retailer requests and behaviour *SI/2021/42*
- Disconnections during pandemic *SI/2021/43*
- Less communication before debt collection *SI/2021/48*
- Unnecessary repeated debt collections calls *SI/2021/69*
- Payment arrangements cancelled after early payments through Centrepay *EWOV/2022/6380*

- Using best endeavours to contact customers before sending final disconnection notice *EWOV/2022/6589*

CUSTOMER SERVICE

- Complaints allege a retailer wasn't contactable *SI/2021/57*

MARKETING

- Exempt seller not meeting obligations *SI/2021/11*
- Another exempt seller misses obligations *SI/2021/16*

PRIVACY

- Privacy measure and concessions *SI/2020/43*
- Postcard leads to potential privacy breach *SI/2020/46*
- Inappropriate third-party customer contact *SI/2021/71*

SUPPLY

- Low gas pressure supply during winter months *SI/2021/49*

SYSTEMIC ISSUES SNAPSHOTS

DISCONNECTIONS DURING PANDEMIC

An energy retailer pursued a disconnection using a bill issued in September 2020, against written advice from the Essential Services Commission that retailers should use bills issued after 1 November 2020. The retailer stopped disconnecting on invoices issued before 1 November and changed the COVID-19 assistance information it provided to customers. *SI/2021/43*

DAYLIGHT SAVINGS AND TIME OF USE

An energy retailer identified that its billing system, introduced in 2018, didn't take account of daylight savings hours for Victorian customers on a Time-Of-Use tariff (TOU). The retailer identified 1,630 accounts that hadn't been billed correctly. It contacted affected customers and didn't seek to recover any undercharged amounts. *EWOV/2022/5196*

DIGITAL METER TRIAL LEADS TO FAILED WATER RECORDS

During its digital meter trial, a water corporation discovered that 500 digital meters weren't displaying or communicating water usage. The water corporation decided to replace the affected digital meters with mechanical meters, and not to bill for unrecorded water use. *EWOV/2022/5824*

TITLE DISCREPANCY LEADS TO OVERCHARGING

Because of a discrepancy between its billing system and the property record system, a water corporation billed title charges incorrectly. 54 customers with 68 properties (50 residential and 18 commercial) were affected. The water corporation contacted all customers and refunded relevant charges going back seven years, as well as interest on the charges. *EWOV/2022/5784*

LESS COMMUNICATION BEFORE DEBT COLLECTION

Customers of one water corporation, who hadn't received final bills or payment reminders after closing their accounts, were contacted by third-party lawyers requesting payments, often for amounts less than \$150. The water corporation said that because of COVID-19 it had stopped sending bill reminder notices and undertaking other collection activities. It confirmed it had referred finalised account holders and customers with two or more outstanding bills to a third-party debt collector. It stopped the practice and resumed its usual billing processes. *SI/2021/48*

BILLING ABOVE THE VICTORIAN DEFAULT OFFER

An exempt seller was billing higher than the Victorian Default Offer (VDO), contrary to changes implemented by the Essential Services Commission on 1 September 2020. The seller acknowledged the overbilling and credited affected customers. It undertook to apply the correct rates going forward. *SI/2021/67*

EXEMPT SELLERS NOT MEETING OBLIGATIONS

Two exempt sellers weren't meeting their obligations under clause 25 of the *Energy Retail Code* to give small customers clear, helpful information that enables them to easily understand their options for purchasing energy. Both exempt sellers admitted to being unaware of the requirements under clause 25 but took action to rectify the issue. *SI/2021/11 & SI/2021/16*

COMPLAINTS ALLEGE A RETAILER WASN'T CONTACTABLE

Multiple complaints to EWOV suggested that a retailer wasn't contactable. The retailer attributed that to a combination of the popularity of its new plans and understaffing. It said it had taken on more staff, and introduced a complaint management inbox, with team leaders now expected to action complaints within one hour. *SI/2021/57*

ELECTRICITY

9,828
CASES RECEIVED
▼ 17%

492
ENQUIRIES RECEIVED
▼ 45%

9,336
COMPLAINTS RECEIVED
▼ 14%

THE CUSTOMERS

There were 3,006,978 electricity customers (2,713,463 residential and 293,515 small business)¹ in Victoria at 30 June 2021. Most of these customers have been able to choose their electricity retailer since early 2002. They can't choose their electricity distributor, because each of the five distributors owns and operates the 'poles and wires' network in a specific part of the state. Some customers in caravan parks, retirement villages and retail complexes buy their electricity through an embedded network entity.

THE COMPANIES

EWOV Limited has 65 electricity members² under licence:

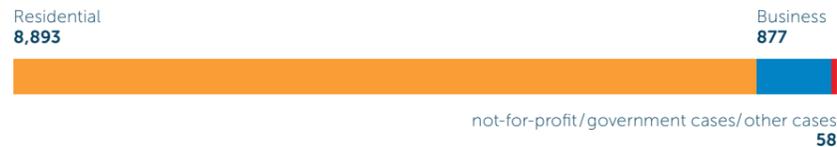
- 57 Retailers
- 5 Distributors
- 3 Transmission companies

A further 546 electricity embedded network entities are members under the *General Exemption Order*

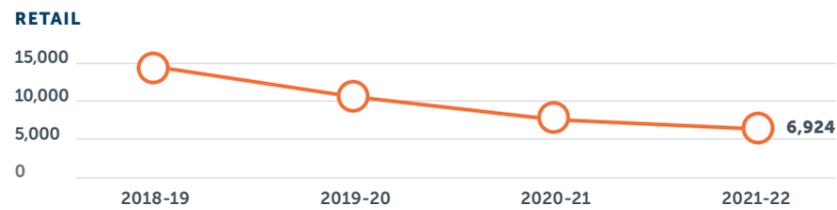
CASES BY STAGES



CASES BY CUSTOMER TYPE



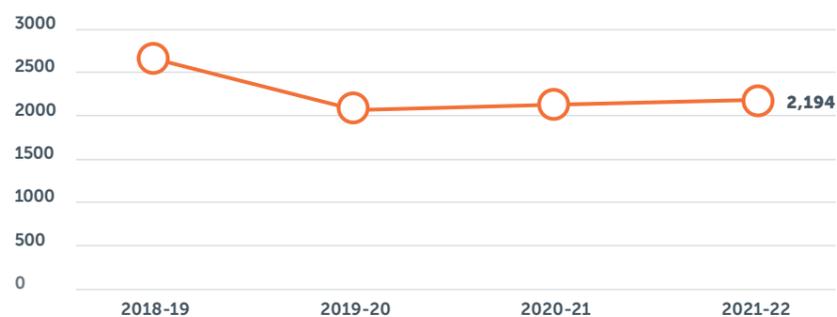
5-YEAR HISTORY OF CASE NUMBERS



EMBEDDED NETWORK



DISTRIBUTION

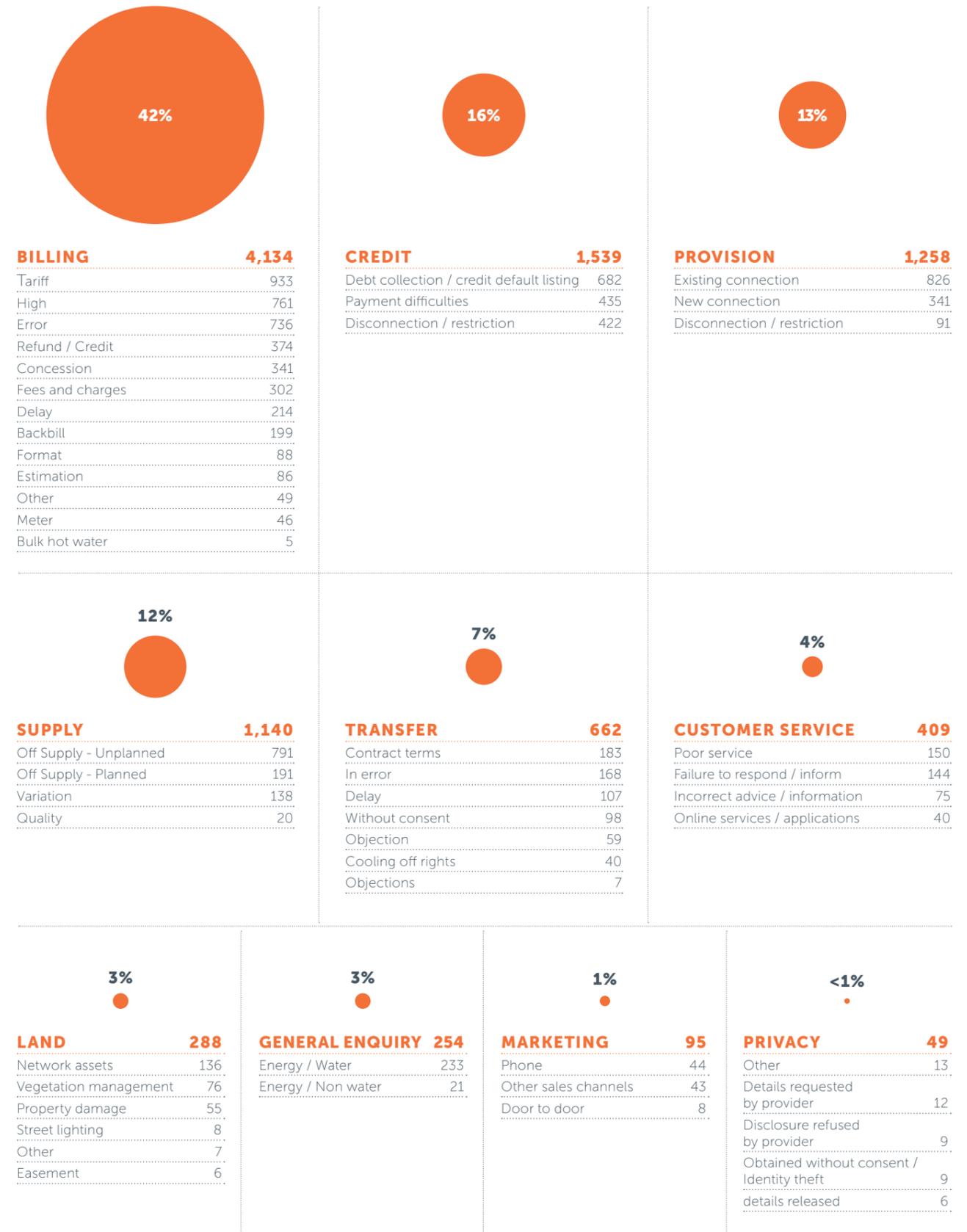


¹ Essential Services Commission 2021, *Victorian Energy Market Report: 2020-21, Appendix: Retailer performance*

² Some EWOV Limited members trade under multiple 'brands'. There's a full list on our website: www.ewov.com.au

Note: There were also 511 (5%) non-company specific electricity cases
Note: Percentages are rounded to the nearest whole number, so may not always add to 100%.

THE MAIN ISSUES



4,739
CASES RECEIVED
▼ 22%

115
ENQUIRIES RECEIVED
▼ 27%

4,624
COMPLAINTS RECEIVED
▼ 21%

THE CUSTOMERS

There were 2,148,644 gas customers (2,087,076 residential and 61,568 small business)³ in Victoria at 30 June 2021. These customers have been able to choose their natural gas retailer since 2002. They can't choose their distributor, because each of the natural gas distributors owns and operates a network of pipes in a specific part of the state. Customers using LPG at home, or in their business, can choose from LPG retailers or resellers operating in their area.

THE COMPANIES

EWOV Limited has 36 gas members³:

- 27 Natural gas retailers under licence
- 5 Natural gas distributors under licence
- 4 Liquefied petroleum gas (LPG) retailers under the *LPG Industry Code*

CASES BY STAGES

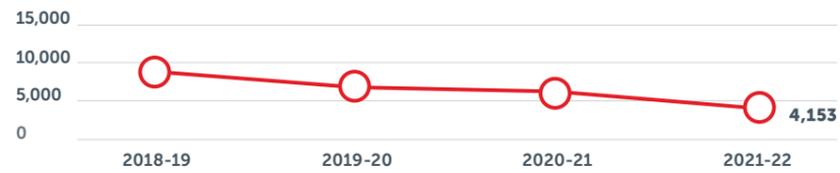


CASES BY CUSTOMER TYPE



5-YEAR HISTORY OF CASE NUMBERS

RETAIL



LPG



DISTRIBUTION



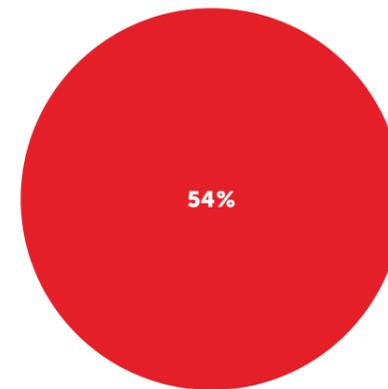
³ Essential Services Commission 2021, Victorian Energy Market Report: 2020-21, Appendix: Retailer performance

⁴ Some EWOV Limited members trade under multiple 'brands'. There's a full list on our website: www.ewov.com.au

Note: There were also 103 (2%) non-company specific gas cases

Note: Percentages are rounded to the nearest whole number, so may not always add to 100%.

THE MAIN ISSUES



BILLING	Count
High	686
Error	484
Estimation	361
Fees and charges	213
Concession	180
Refund / Credit	155
Backbill	147
Tarrif	99
Bulk hot water	73
Delay	51
Meter	44
Format	31
Other	23



TRANSFER	Count
In error	158
Delay	134
Without consent	56
Contract terms	45
Objection	36
Cooling off rights	12
Objections	4



LAND	Count
Property damage	47
Network assets	41
Vegetation management	2
Other	1



CREDIT	Count
Collection	352
Disconnection / Restriction	278
Payment difficulties	269
Deliveries stopped	4



CUSTOMER SERVICE	Count
Poor service	63
Failure to respond / inform	45
Incorrect advice / information	20
Online services / applications	8



MARKETING	Count
Other sales channels	6
Phone	5
Door to door	4



PROVISION	Count
Existing connection	299
New connection	114
Disconnection / restriction	42
Deliveries stopped	6



SUPPLY	Count
Quality	46
Off supply - Unplanned	26
Off supply - Planned	10
Variation	9



PRIVACY	Count
Details released	4
Other	3
Details requested by provider	2
Disclosure refused by provider	2
Obtained without consent / Identity theft	1

1,350
CASES RECEIVED
▼ 11%

51
ENQUIRIES RECEIVED
▼ 54%

1,299
COMPLAINTS RECEIVED
▼ 8%

THE CUSTOMERS

There were 2,929,194⁵ water customers (2,697,153 residential and 232,041 non-residential) in Victoria at 30 June 2021. These customers are provided with water supply, sewage and trade waste disposal and treatment, water delivery for irrigation and domestic and stock purposes, drainage, and salinity mitigation services.

THE COMPANIES

EWOV Limited has 18 water members⁶, all State-owned water corporations constituted under the *Water Industry Act 1989*:

- 3 metropolitan retailers
- 1 metropolitan wholesaler
- 10 regional urban water corporations
- 2 rural water corporations
- 2 rural urban corporations

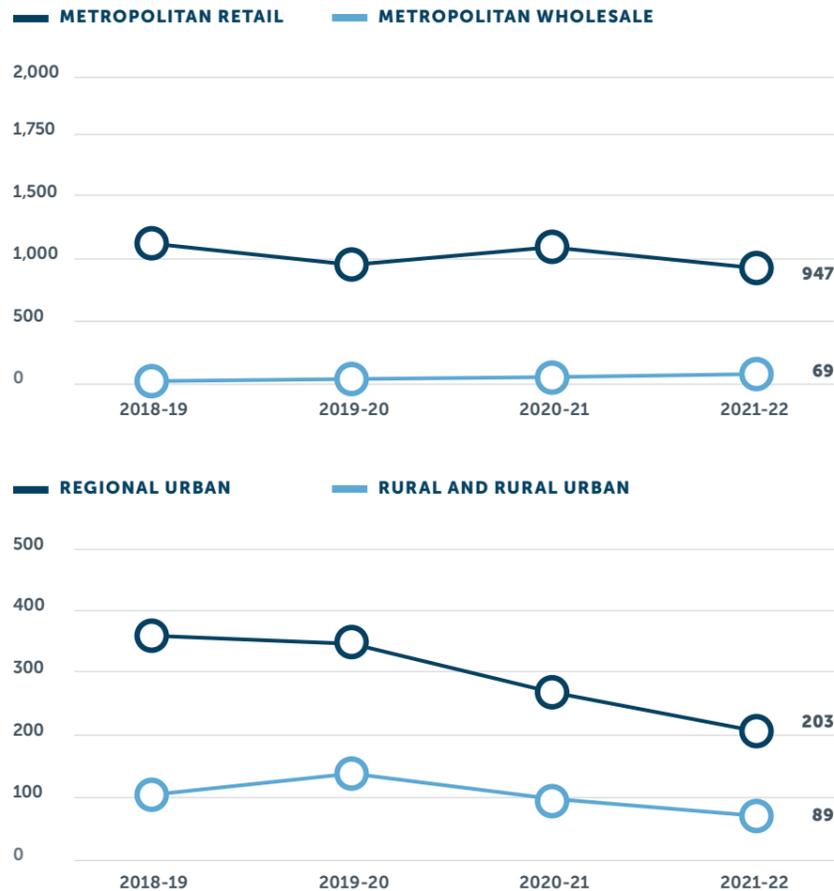
CASES BY STAGES



CASES BY CUSTOMER TYPE



5-YEAR HISTORY OF CASE NUMBERS



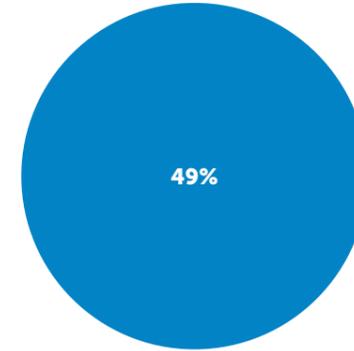
⁵ Essential Services Commission 2022, Water Performance Report 2020-21: Performance of Victorian urban water and sewerage businesses, 8 February

⁶ Listed on our website: www.ewov.com.au

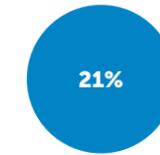
Note: There were also 42 (3%) non-company specific water cases

Note: Percentages are rounded to the nearest whole number, so may not always add to 100%.

THE MAIN ISSUES



BILLING	658
High	283
Fees and charges	122
Error	97
Refund / Credit	32
Backbill	25
Concession	23
Estimation	23
Format	20
Other	11
Meter	10
Delay	9
Tariff	3



LAND	285
Network assets	139
Property damage	96
Other	23
Easement	22
Vegetation management	5

8%



SUPPLY	108
Quality	46
Sewer / Stormwater overflow	24
Off Supply - Planned	14
Off Supply - Unplanned	11
Variation	8
Water licensing	5

8%



CREDIT	103
Collection	58
Payment difficulties	44
Restriction	1

7%



PROVISION	100
Existing connection	59
New connection	41

4%



CUSTOMER SERVICE	55
Failure to respond / inform	24
Poor service	21
Incorrect advice / information	6
Online services / applications	4

2%



GENERAL ENQUIRY	26
Energy / Water	24
Energy / Non water	2

1%



PRIVACY	14
Details released	8
Details requested by provider	2
Disclosure refused by provider	2
Other	2

<1%



TRANSFER	1
Without consent	1

FINANCIAL STATEMENTS

STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME

FOR THE YEAR ENDED 30 JUNE 2022

	2022	2021
	\$	\$
Revenue	9,183,164	9,849,188
Administrative expenses	(921,799)	(816,285)
Bad debts reversal/(expenses)	5,345	(67,615)
Consultancy expenses	(627,179)	(118,065)
Depreciation and amortisation expenses	(1,100,126)	(1,107,025)
Employee benefits expenses	(6,527,712)	(6,493,033)
Finance expenses	(179,498)	(204,317)
Occupancy expenses	(266,086)	(253,227)
Policy and Communication expenses	(110,812)	(139,068)
Training and development expenses	(100,841)	(106,675)
Surplus/(Deficit)	(645,544)	543,878
Income tax expense	-	-
Surplus/(Deficit) from continuing operations	(645,544)	543,878
Total comprehensive income for the year	(645,544)	543,878

STATEMENT OF FINANCIAL POSITION

FOR THE YEAR ENDED 30 JUNE 2022

	2022	2021
	\$	\$
Current Assets		
Cash and cash equivalents	4,099,672	4,005,729
Trade and other receivables	72,658	42,113
Other financial assets	3,282,664	3,275,803
Other assets	17,625	142,797
Total Current Assets	7,472,619	7,466,442
Non-Current Assets		
Intangible assets	128,142	202,368
Property, plant and equipment	1,596,744	1,919,503
Right-of-Use Assets	3,369,740	4,047,968
Total Non-Current Assets	5,094,626	6,169,839
Total Assets	12,567,245	13,636,281
LIABILITIES		
Current Liabilities		
Lease liabilities	823,692	780,529
Trade and other payables	229,740	165,916
Other financial liabilities	894,231	362,319
Employee benefits	732,874	1,022,658
Total Current Liabilities	2,680,537	2,331,422
Non-Current Liabilities		
Lease liabilities	4,055,364	4,880,482
Employee benefits	116,191	74,026
Long-term provisions	690,857	680,511
Total Non-Current Liabilities	4,862,412	5,635,019
Total Liabilities	7,542,949	7,966,441
Net Assets	5,024,296	5,669,840
EQUITY		
Accumulated surplus	5,024,296	5,669,840
Total Equity	5,024,296	5,669,840

STATEMENT OF CASH FLOWS

FOR THE YEAR ENDED 30 JUNE 2022

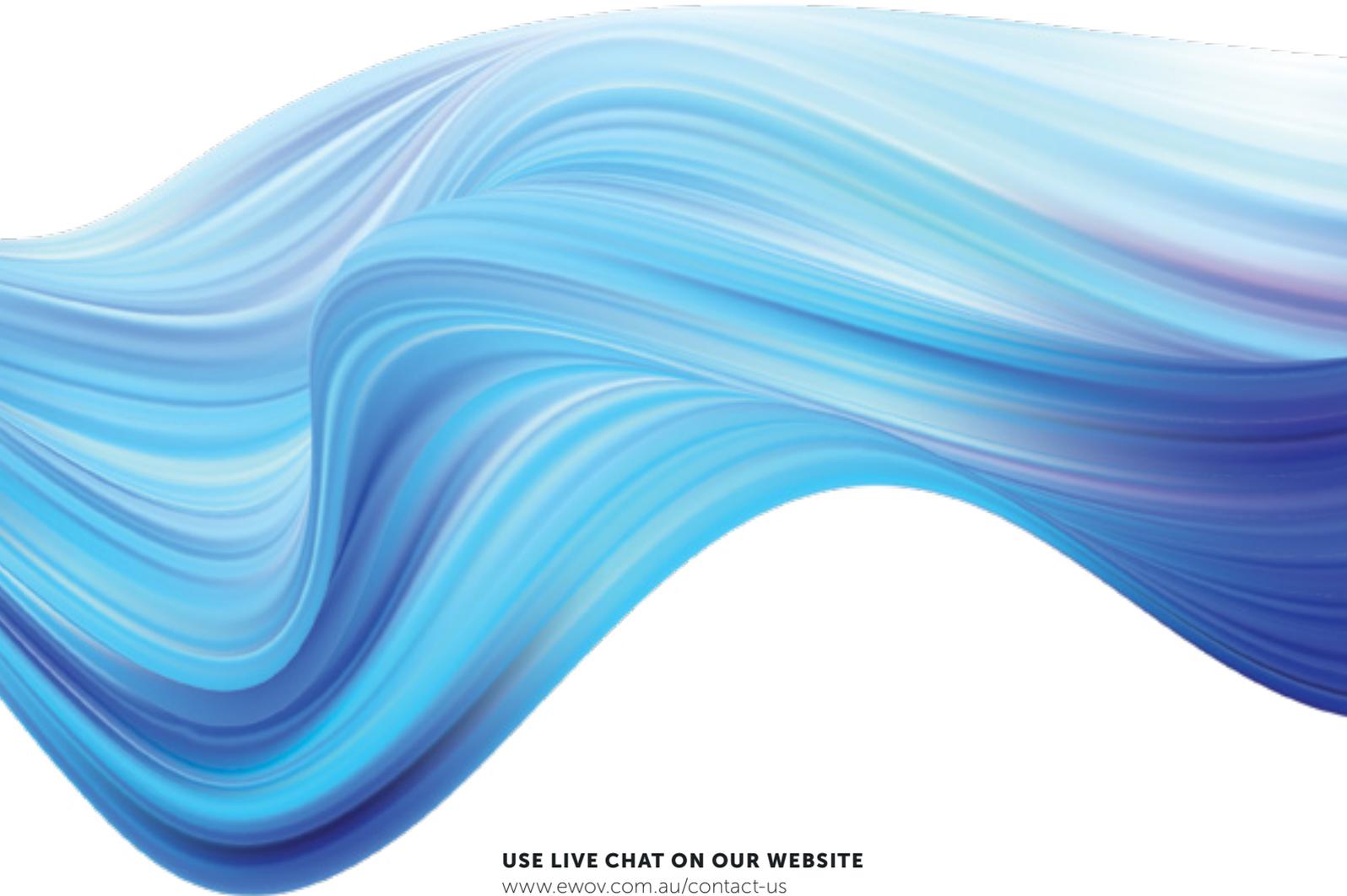
	2022	2021
	\$	\$
Cash Flows from Operating Activities		
Receipts from Members	10,589,479	10,164,515
Interest received	12,740	25,501
Other income	-	51,330
Payments to suppliers and employees	(9,510,822)	(9,098,148)
Finance costs	(179,498)	(204,371)
Net cash provided by/(used in) operating activities	911,899	938,881
Cash Flows from Investing Activities		
Payments for property, plant and equipment	(36,001)	(104,371)
Net cash from / (used in) investing activities	(36,001)	(104,371)
Cash Flows from Financing Activities		
Repayment of lease liabilities	(781,955)	(671,964)
Net cash provided by/(used in) financing activities	(781,955)	(671,964)
Net increase/(decrease) in cash and cash equivalents held	93,943	162,546
Cash and cash equivalents at beginning of year	4,005,729	3,843,183
Cash and cash equivalents at the end of the Financial Year	4,099,672	4,005,729



HOW TO CONTACT EWOV

We can help with complaints about electricity, gas or water companies, which a customer hasn't been able to resolve directly with the company.

Our services are free and available to everyone.



FREE CALL

1800 500 509

Calls from mobile phones may attract charges. We can call back.

Interpreter service : 131 450
National Relay Service : 133 677

USE LIVE CHAT ON OUR WEBSITE

www.ewov.com.au/contact-us

USE THE COMPLAINT FORM ON OUR WEBSITE

www.ewov.com.au/start-a-complaint

WRITE TO US

Reply Paid 469 Melbourne VIC 8060. We accept letters in Braille.

EMAIL US

ewovinfo@ewov.com.au

FAX US

1800 500 549 (free fax)

ABN : 57 070 516 175