



Res ONLINE



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

CONTENTS

3.....THE OMBUDSMAN'S VIEW

4.....THE BIG PICTURE

5.....FEATURE: SMART METERS – SHARING EWOV'S EXPERIENCE

10.....BILLING

12.....CREDIT

16.....TRANSFER

18.....ELECTRICITY

19.....GAS

20.....WATER

21.....SYSTEMIC ISSUES

23.....PUBLIC SUBMISSIONS

24.....GLOSSARY

FIGURES

5.....FIGURE 1.
The number of EWOV Smart Meter-related cases each financial year since 2009-10

10.....FIGURE 2.
Billing cases

12.....FIGURE 3.
Credit cases

13.....FIGURE 4.
Credit-related disconnection and restriction cases

14.....FIGURE 5.
WDP outcomes

16.....FIGURE 6.
Transfer cases

18.....FIGURE 7.
Electricity cases

19.....FIGURE 8.
Gas cases

20.....FIGURE 9.
Water cases

THE OMBUDSMAN'S VIEW

Smart Meters – sharing our experience

With the Victorian rollout of some 2.8 million Smart Meters and almost 21,000 related EWOV cases behind us, we've certainly learnt a thing or two about how the introduction of Smart Meters generates customer complaints – pre-installation, during installation and post-installation.

Our [feature article](#) draws on EWOV's experience to make what we hope is an insightful and useful contribution to the planning – by industry, government, other energy ombudsman schemes, and consumers and their representatives – for Smart Meter rollouts in other states.

With... 2.8 million Smart Meters and almost 21,000 related EWOV cases behind us, we've certainly learnt a thing or two.

Tracking downwards trends in cases

EWOV cases fell 7% against the previous quarter, and were down across almost all issues categories, including the top three categories of billing, credit and transfer. [Read](#) about the case numbers, issues and trends.

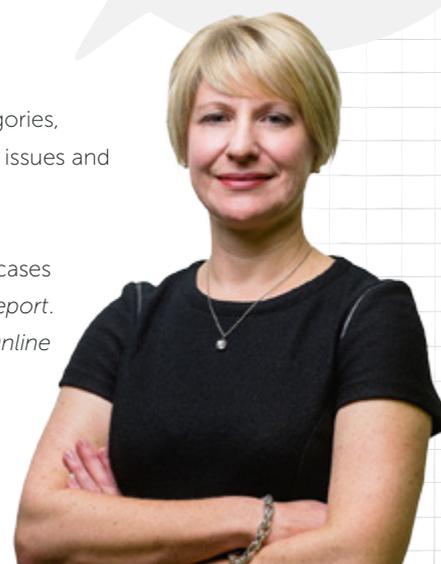
With marketing cases (125) down 47% against those for the same quarter in 2014 and transfer cases (1,190) similarly down 38%, we've decided to retire EWOV's quarterly *Marketing and Transfer Report*. Because transfer is still the third most common issues category overall, in this edition of *Res Online* (and going forward), you'll find a report on [transfer cases](#), including a recent case study.

Complaints about solar installers

We receive a high number of enquiries from customers wanting to make a complaint about the installation of a solar photovoltaic (PV) system by a solar installer. Complaints about solar installers fall outside EWOV's jurisdiction and should be directed to Consumer Affairs Victoria. However, we can help with complaints about solar-related electricity billing, connection and metering. See our website (under [Hot Topics](#)) for more information and links.

2015 Annual Report

EWOV's *2015 Annual Report* will be released in mid-October 2015, in hard copy and online. It reports on another busy year, one which presented us with some new challenges.



Cynthia Gebert
Energy and Water Ombudsman (Victoria)

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

Cynthia Gebert

Energy and Water Ombudsman (Victoria)

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', written in a cursive style.

THE BIG PICTURE

APRIL—JUNE 2015

Compared to last quarter:



CASES

- 7%



ENQUIRIES

+ 18%



UNASSISTED REFERRALS

- 2%



ASSISTED REFERRALS

- 9%



REAL TIME RESOLUTIONS

- 23%



INVESTIGATIONS

- 4%

10,470 CASES

572 ENQUIRIES

9,898 COMPLAINTS

6,198 ASSISTED REFERRALS

1,437 UNASSISTED REFERRALS

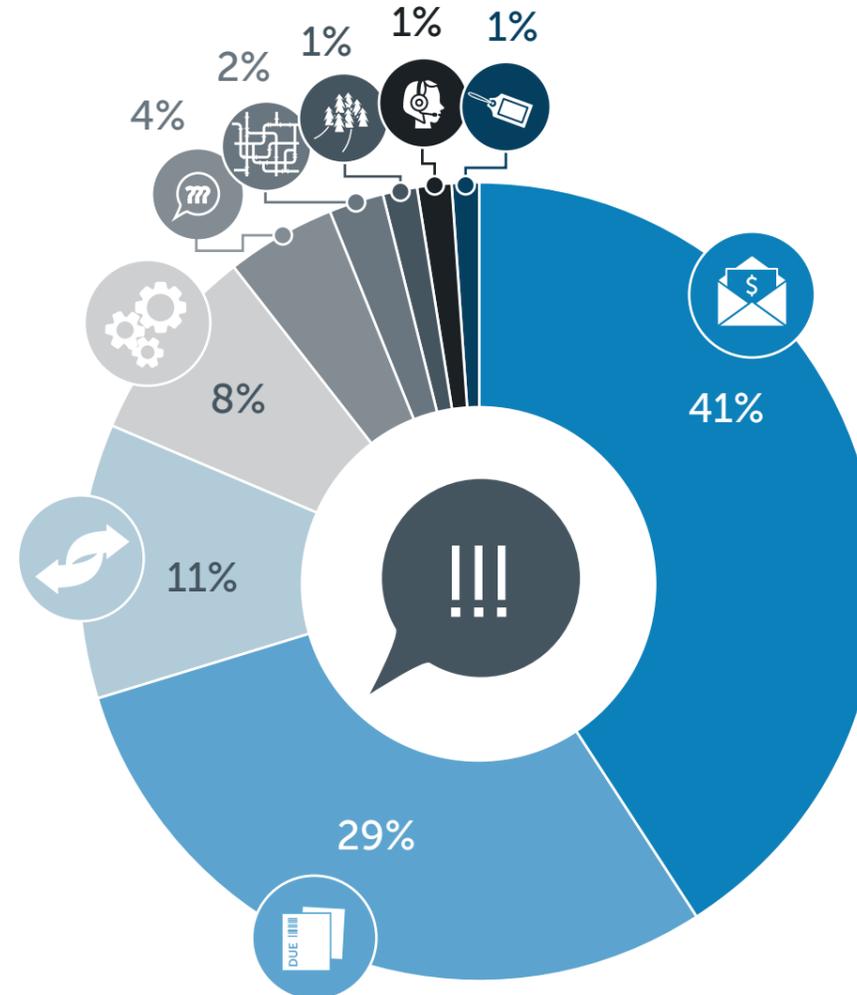
513 REAL TIME RESOLUTIONS

439 were finalised

1,750 INVESTIGATIONS

1,821 were finalised

The issues customers complained about



Compared to last quarter:



BILLING
4,286 cases
-11%



CREDIT
3,087 cases
-10%



TRANSFER
1,174 cases
-1%



PROVISION
824 cases
+9%



GENERAL ENQUIRY
463 cases
+16%



SUPPLY
245 cases
-27%



LAND
145 cases
+17%



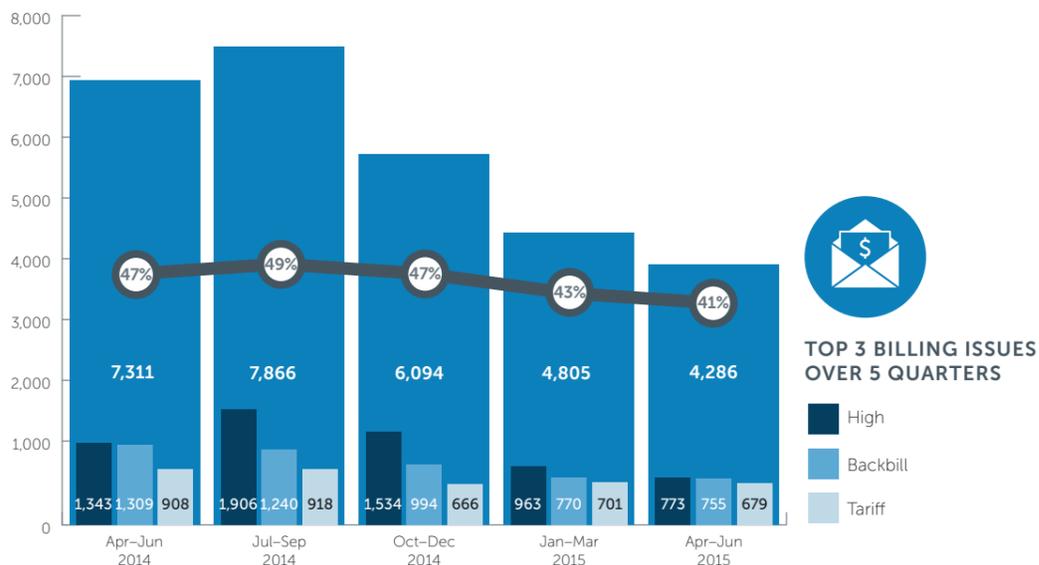
CUSTOMER SERVICE
139 cases
+17%



MARKETING
107 cases
-14%

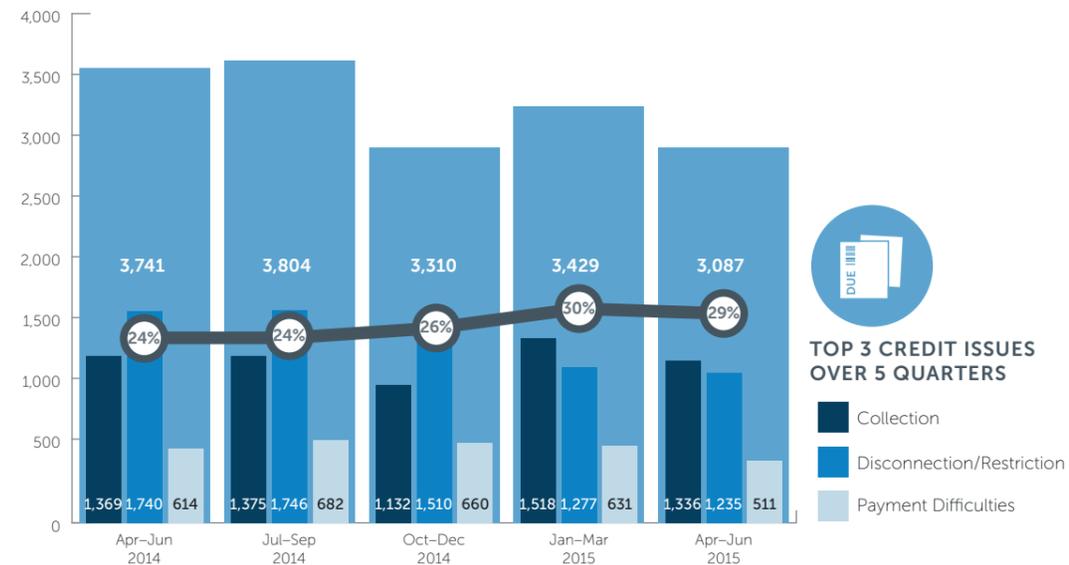
Billing cases

Number of Billing cases % of overall cases



Credit cases

Number of Credit cases % of overall cases



FEATURE: SMART METERS – SHARING EWOV’S EXPERIENCE

Since September 2009, electricity distributors have installed around 2.8 million Smart Meters at properties in Victoria as part of the State Government mandated rollout. Since July 2009, EWOV has received almost 21,000 cases related to Smart Meters.

We believe the electricity industry across Australia will have learnt much from the experience of the Victorian rollout. EWOV has also built its experience and expertise and is in a good position to provide useful insight into customer concerns, ahead of Smart Meter rollouts in other jurisdictions.

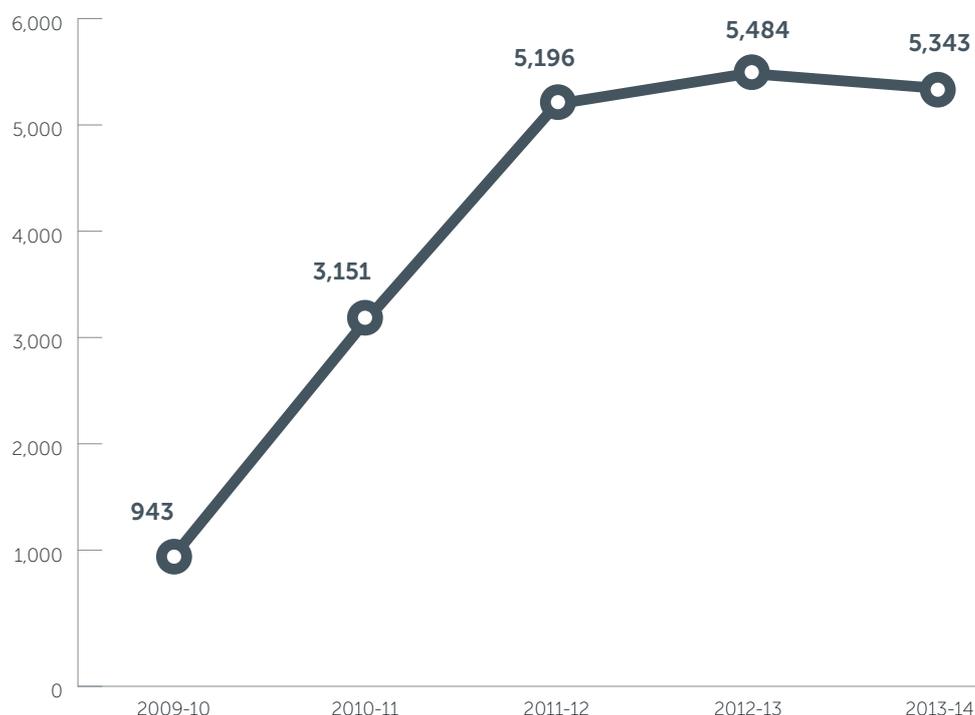
Smart Meter technology offers customers a range of benefits, including the capacity to monitor their ‘real-time’ electricity use through web portals and in-home displays, greater accuracy of meter reading and billing information, and access to flexible pricing tariffs.

However, the introduction of Smart Meters across Victoria generated customer complaints on a number of fronts.

As the graph at below shows, Smart Meter cases to EWOV increased quickly over the first three years of the rollout – in the beginning driven by media coverage and the absence of ready information for customers, and later as the rate of meter installations increased. Cases plateaued in the later stages of the rollout, but remained high.

The issues customers have complained to EWOV about can be categorised by the three stages of the rollout – pre-installation, meter exchange and post-installation.

FIGURE 1.
The number of EWOV Smart Meter-related cases each financial year since 2009-10



DID YOU KNOW?

Smart Meters are installed by Victoria’s five electricity distributors – CitiPower, Jemena, Powercor, AusNet Services and United Energy – which own and manage the poles and wires that deliver power to homes and businesses across Melbourne and throughout the state.

Electricity meters have always been the property of the electricity distributors, who are therefore allowed to replace their equipment. Property owners are obliged to provide reasonable access to their property for this to occur.

More at: smartmeters.vic.gov.au

Pre-installation complaints

Many of the things customers raised with us before the installation of a Smart Meter at their property fell outside EWOV's jurisdiction, because the issue related to government policy and pricing. Even so, we were able to offer general advice and help and, as appropriate, refer them to the then Department of Primary Industries, the Essential Services Commission, their local Member of Parliament, or to a higher level contact within an electricity company.

Customers were often seeking general information about the rollout (e.g. whether it was really mandatory; whether installation could be delayed or deferred) or they wanted to complain about the government policy underpinning the rollout, the associated costs, or perceived health and safety risks. Commonly they contacted us when they couldn't get answers elsewhere. Increases in enquiries and complaints could be tracked back to media coverage, including negative publicity and confused messages about Smart Meters.



CASE STUDY

Concerns about safety — customer wanted meter installation deferred

The customer received a letter from the local electricity distributor advising of its upcoming installation of a Smart Meter at her home. The customer, aware of media reports of potential safety issues, contacted the distributor asking that it defer installation. When the distributor said installation would go ahead as scheduled, the customer (who had heard of other customers having installation deferred) contacted EWOV seeking deferral, or a clear explanation of why this couldn't be done. At the distributor's request, we opened an Investigation.

Although the distributor had previously insisted that installation couldn't be deferred and would go ahead as scheduled, during our Investigation, it said it could put the customer on a 'deferral list'. The complaint was resolved and closed when the distributor confirmed it had added the customer's name to a list of installations that would be deferred, pending the outcome of the Victorian Government's review of the Advanced Metering Infrastructure (AMI) program. It also agreed to provide the customer with written confirmation of this. C/2011/3461 and C/2011/4297

The customer, aware of media reports of potential safety issues, contacted the distributor asking that it defer installation.

Complaints at the meter exchange

At the point where the electricity distributor exchanged the existing meter at a property for a Smart Meter, the nature of the complaints changed.

Sometimes the customer received a defect notice from their distributor, requiring them to fix something relating to their electricity supply before the Smart Meter could be installed – for example, hazardous wiring, a broken meter board or obstructive home renovations. Adding to the concerns of customers who received a defect notice was the additional advice that their supply may be disconnected if the defect wasn't fixed within a certain timeframe.

Customers also complained about damage to their property caused by the person installing the Smart Meter, or the quality of the workmanship, or about the inconvenience of having to provide access so the installer could do the job.

For some customers, the meter exchange affected or delayed the progress of their solar application and eligibility for feed-in tariffs. These complaints were especially evident around the in-demand Premium Feed-in Tariff.



CASE STUDY

Rotting food and appliance damage – the power didn't come back on after the meter installation

The customer blamed his local electricity distributor when he came home to find his power off and rotting food in his fridge and freezers. A Smart Meter had been installed at his property while he was away. He said he had to replace his appliances (one of which was new) and have his house cleaned. He sought \$6,000 compensation from the distributor, providing photos as evidence of his losses. When the distributor offered only \$2,000, he contacted EWOV. At the distributor's request, we opened an Investigation.

The distributor said the customer hadn't provided written substantiation to support his full \$6,000 claim – no written evidence of his labour costs or the original purchase receipts that the distributor had requested. We found this to be the case. Our Investigation also revealed that the Smart Meter didn't record any consumption following its installation, which confirmed that the power wasn't restored. We checked and found there had been no general power outage incident. The distributor maintained that its records showed that the installer hadn't tripped the safety switch, or left the main switch off, so it was unclear why the power wasn't restored. The complaint was resolved and closed when the distributor increased its offer to \$2,415, with no admission of liability. 2012/21829

(The customer) sought \$6,000 compensation from the distributor... When the distributor offered only \$2,000, he contacted EWOV.

Post-installation complaints

Billing accuracy is the main thing customers complain about following the installation of a Smart Meter at their property. Commonly their complaint is about a bill that's higher than usual. Investigating these types of complaints, especially from residential customers, we often find that the old analogue meter at the customer's property was under-recording their usage — because the Smart Meter is reading more accurately, the customer's bills are higher. These types of high bill complaints become more complicated when the analogue meter isn't available for an accuracy test and/or the customer's last bill on the old analogue meter was based on an incorrect or estimated final meter reading.

Concerns have been raised that customers find it hard to compare the readings on the Smart Meter to the information on their bills. The Victorian Government has moved to address this through legislation, which requires energy retailers to provide index reads on all electricity bills to show each meter register's total electricity consumption.

For some customers, the installation of a Smart Meter affected their tariff arrangements, for example, loss of an off-peak rate for a time-of-use tariff, or for the controlled load of a dedicated hot water system. Sometimes it turned out that the controlled load appliance was incorrectly wired to the Smart Meter. There were also billing delays while electricity retailers made their billing systems compatible with new Smart Meter data files.



CASE STUDY

Billed for someone else's property — account was assigned the wrong meter number

After the installation of the Smart Meter, the customer was billed for the wrong property. Her retailer confirmed the error. The customer subsequently received an amended bill for the period February 2014 to February 2015. She could see that the meter number on her bill now matched the number on the meter at her property, but the opening balance on the amended bill didn't appear to be correct. In addition, the meter readings on the bill were estimated and, she believed, substantially over-estimated. The customer said her billing was fine until the installation of the Smart Meter. While the retailer had put her account on hold, it still hadn't addressed her concerns after several months.

Responding to our Investigation, the retailer advised that, in a scheduled meter exchange in February 2014 the wrong meter number was assigned to the customer's account. This resulted in five bills based on the wrong meter. Those bills were reversed and the account re-billed in April 2015. But the re-billing was based on 'substituted' meter data which assumed consumption significantly higher than the customer's historical usage. The retailer said it was seeking amended data from the distributor, so it could re-bill again. During our Investigation, we reviewed a reconciliation of the customer's account, as well as financial records, metering data, bills and contact notes from the retailer.

Having received the amended historical meter data from the distributor (for the correct meter), the retailer re-billed the account a second time, for the period February 2014 to May 2015. This resulted in a credit of \$595.33 for the customer. It apologised for the delay and credited his account with a further \$54.57. This left the account \$650 in credit, which it refunded to the customer by cheque. It confirmed that his future bills would be based on actual meter data from the correct meter. The customer was satisfied with the outcome and the complaint was closed. 2015/9195

The customer said her billing was fine until the installation of the Smart Meter.

Looking forward

With the introduction of Smart Meters, customers now have the choice of switching to flexible pricing (different rates for different times of day). So far, we've received few complaints related to flexible pricing and Smart Meter complaints continue to fall.

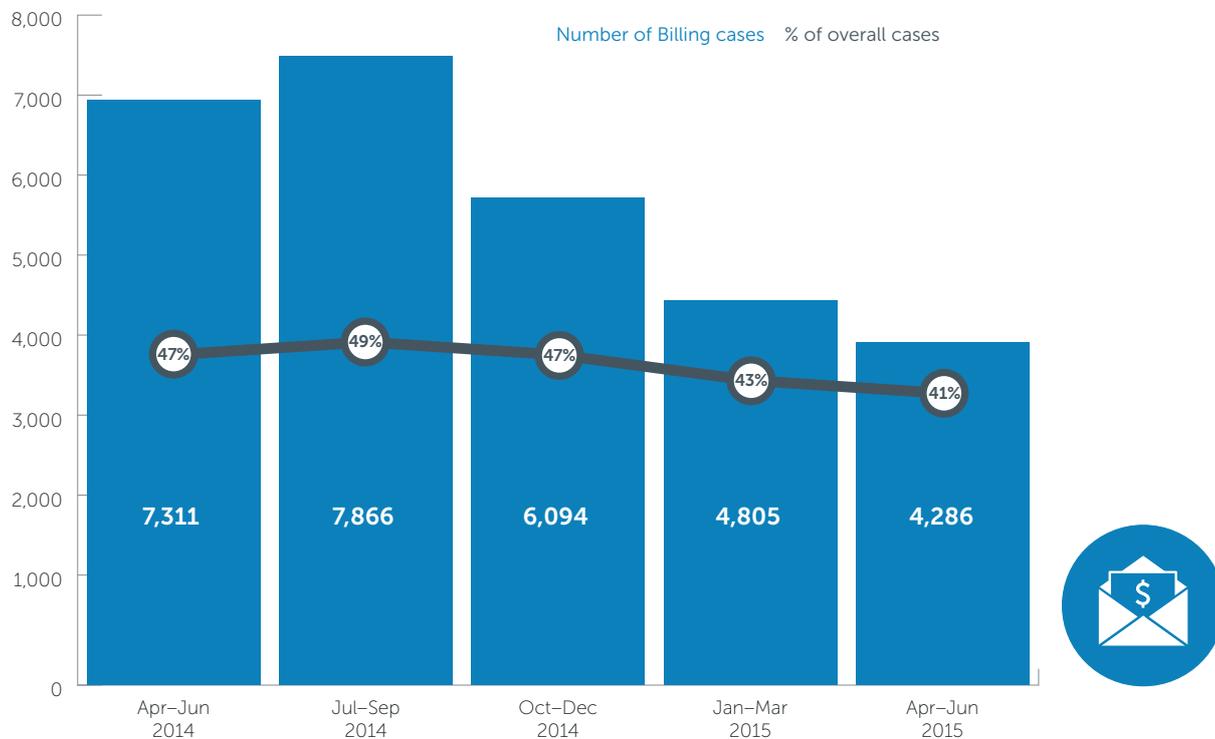
With new technology driving ongoing change in the energy market, we think it's likely that the focus of complaints will shift to issues such as access to data, tariffs/pricing and other new and sometimes complex products enabled by the technology. The introduction of metering contestability may also drive future complaints – the Australian Energy Market Commission's *Final Determination* on this is scheduled for November 2015.

Useful links

- EWOV's quarterly [Solar and Smart Meter Report](#)
- EWOV fact sheets:
 - [Smart Meter Basics](#)
 - [EWOV's role with Smart Meters](#)
 - [Flexible electricity pricing](#)
- Victorian Government's [Smart Meters website](#)
- Australian Energy Market Commission (AEMC): [Expanding competition in metering and related services](#)

BILLING

FIGURE 2.
Billing cases



1
2

COMPARED TO
LAST QUARTER
BILLING CASES

- **11%**

1
2
3
4

COMPARED TO
THIS TIME LAST YEAR
BILLING CASES

- **41%**



CASE STUDY

Estimated bills and access issues eventually addressed by remote meter reading

When customers aren't given clear, accurate information about the basis for estimated bills and how to rectify meter access/estimation issues, their high bill concerns are unlikely to be resolved.

The customer was disputing high estimated bills. He said the meter at his property was inside the building and accessible only when he was there, which was usually outside business hours. He said his electricity retailer told him the billing was correct and based on actual readings, but it couldn't provide him with meter reading dates. He'd tried to read the meter himself, but couldn't.

Despite protracted discussions, the customer remained dissatisfied that his concerns weren't being acknowledged. He also wanted to know when the meter, a Smart Meter, would be configured for remote reading.

Responding to EWOV's initial contact, the retailer confirmed that the customer's most recent bill (for \$1,634.51) was correct and based on an actual meter reading. It said his previous bills had been estimated due to access issues, and the customer was aware of this. It placed a hold on the account, offering to move it to monthly billing and allow the customer to provide his own readings of the meter. It said that if the customer wanted remote access, he would have to arrange that through a third party at his own cost. The customer remained dissatisfied with the retailer's response.

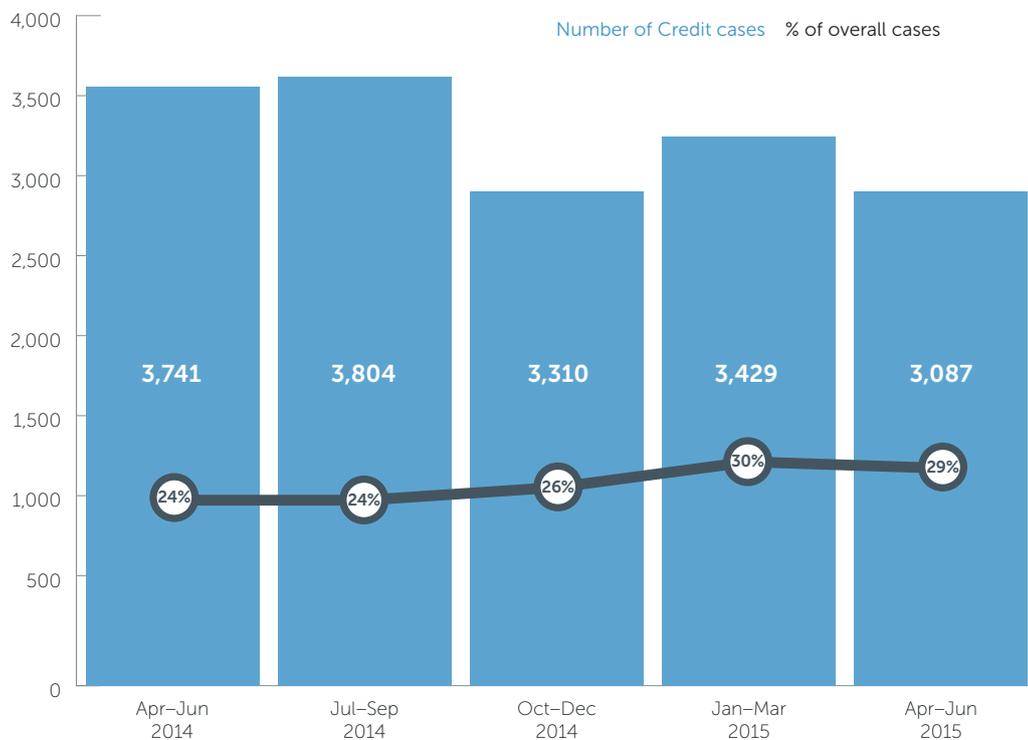
When the complaint couldn't be resolved otherwise, we opened an Investigation. From our review of the customer's historical meter data and the retailer's contact notes, we concluded that the billing was correct. While his bills had been estimated as a result of access issues (locked premises), in late January 2015 the meter had been reconfigured for interval and, at that point, an actual reading had been obtained.

The retailer apologised for the delay in resolving the customer's concerns. It confirmed he hadn't been default-listed, so his credit rating was unaffected. It also confirmed that the meter was now configured to be read remotely. It offered to re-bill the customer on better rates, backdated (with applicable discounts) to when his account was set up. It also offered to arrange a suitable payment arrangement for the rebilled account, should he require it. The customer accepted the retailer's offer and the complaint was closed. 2015/11773

... his electricity retailer told him the billing was correct and based on actual readings, but it couldn't provide him with meter reading dates...

CREDIT

FIGURE 3.
Credit cases



COMPARED TO
LAST QUARTER
CREDIT CASES

- 10%



COMPARED TO
THIS TIME LAST YEAR
CREDIT CASES

- 17%

FIGURE 4.
Credit-related disconnection and restriction cases

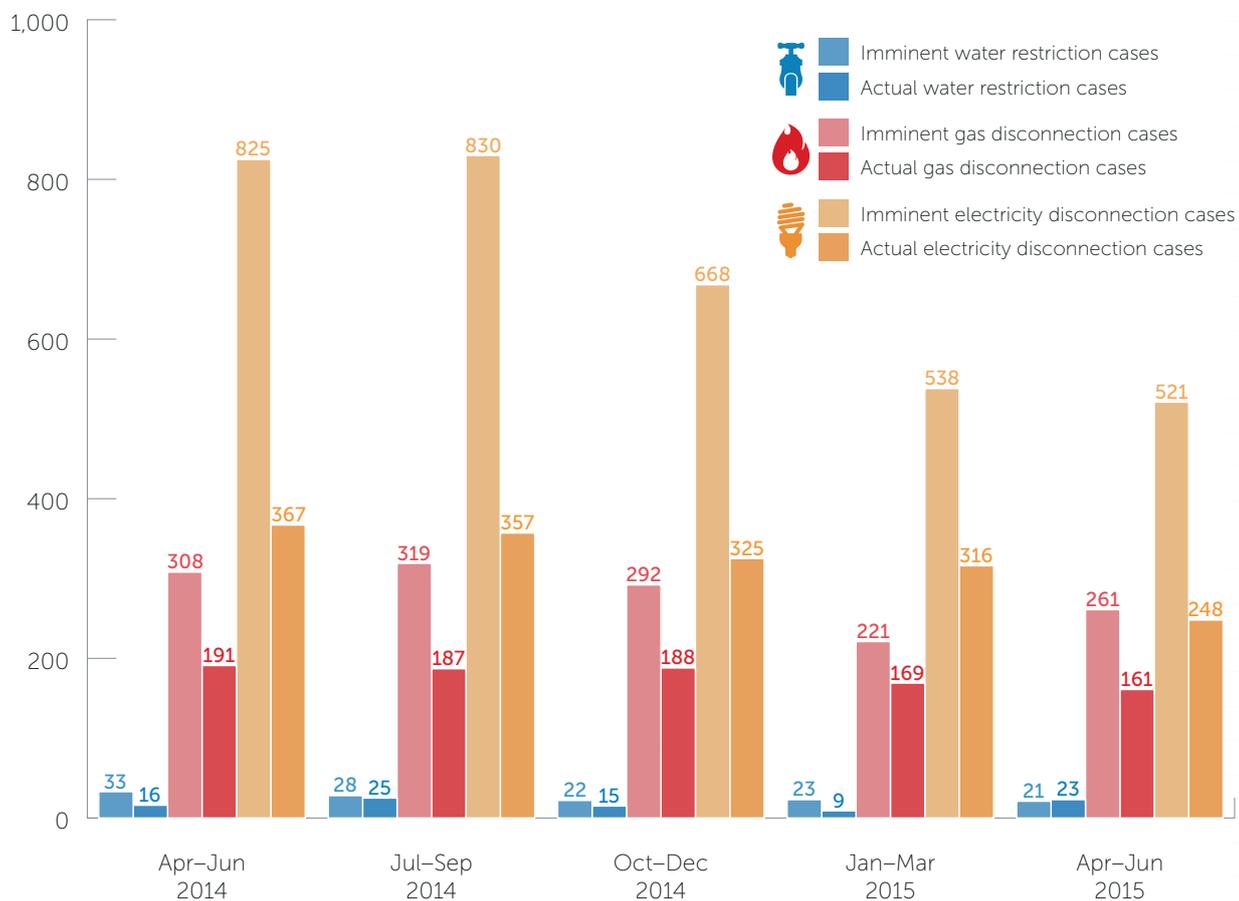
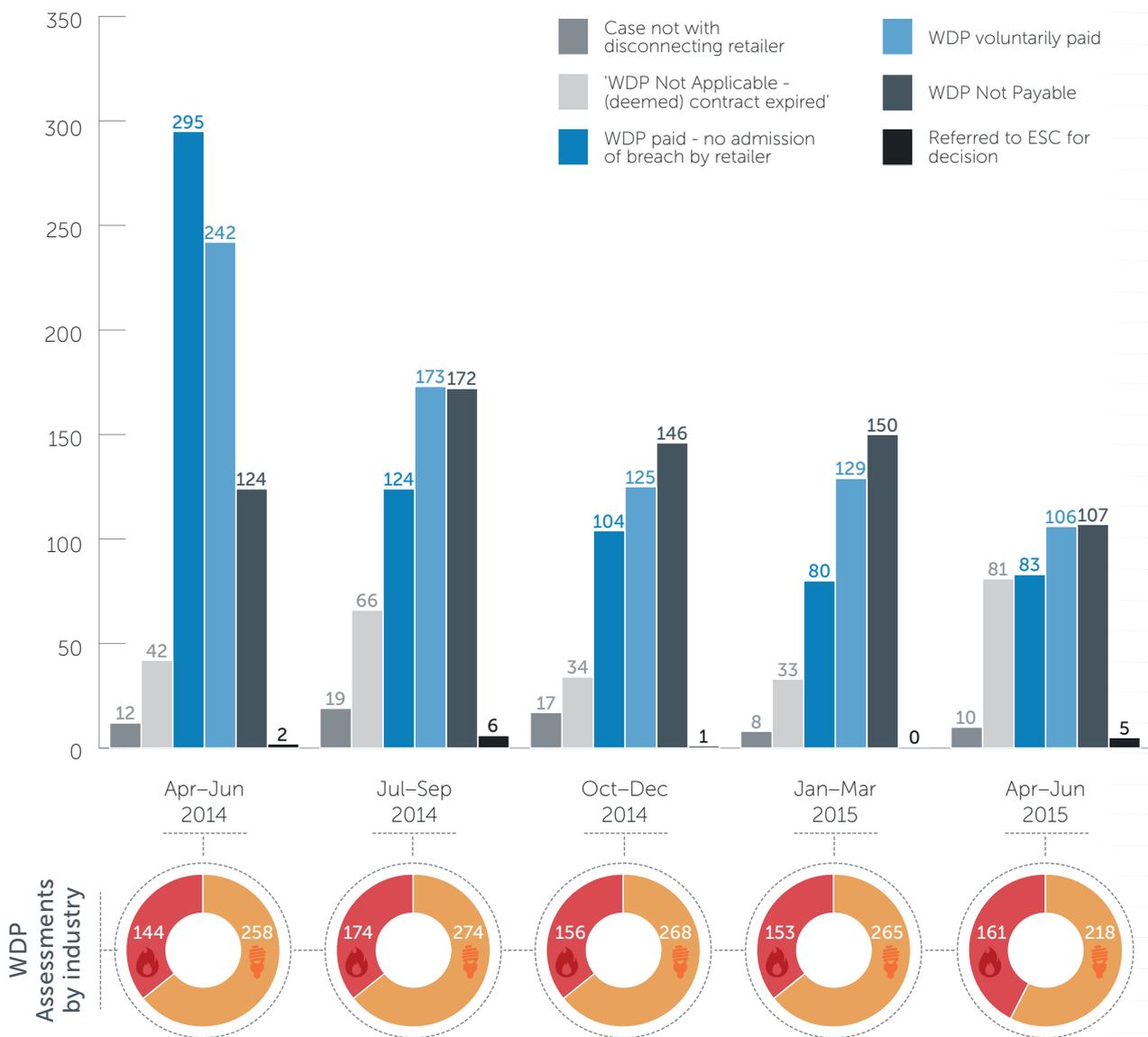


FIGURE 5.
WDP outcomes





CASE STUDY

Disconnection for arrears after the customer reverted to paying a lower instalment amount

This case highlights some common issues which arise in EWOV's credit cases – the affordability of payment plans and the importance of ongoing contact between customers and companies so that payment issues don't reach the point of disconnection.

The customer's electricity was disconnected in early April 2015 for non-payment. When she contacted her retailer seeking reconnection, she was asked for a payment of \$400 upfront, which she couldn't afford. She was also told that her fortnightly payment plan of \$50 had been increased to \$85. The customer, who owed around \$700, said she told the retailer she needed electricity for a machine to support her breathing, but the retailer said it didn't have any paperwork verifying this.

When she contacted EWOV seeking urgent reconnection of her electricity, the customer told us she'd been making fortnightly payments of \$50, as agreed with her retailer. We arranged for reconnection of her electricity while we investigated her complaint. We also began an assessment of whether the disconnection had been carried out in line with the rules in the *Energy Retail Code*.

The electricity retailer provided us with an account reconciliation, contact notes, and copies of the correspondence it had sent to the customer. We reviewed this information and found that the retailer had written to the customer in December 2014, advising her of the increased instalment amount of \$85. The account reconciliation showed that three \$85 payments had been made, after which the payments dropped back to \$50. There was no contact by the customer to explain why, or to say that \$85 wasn't affordable.

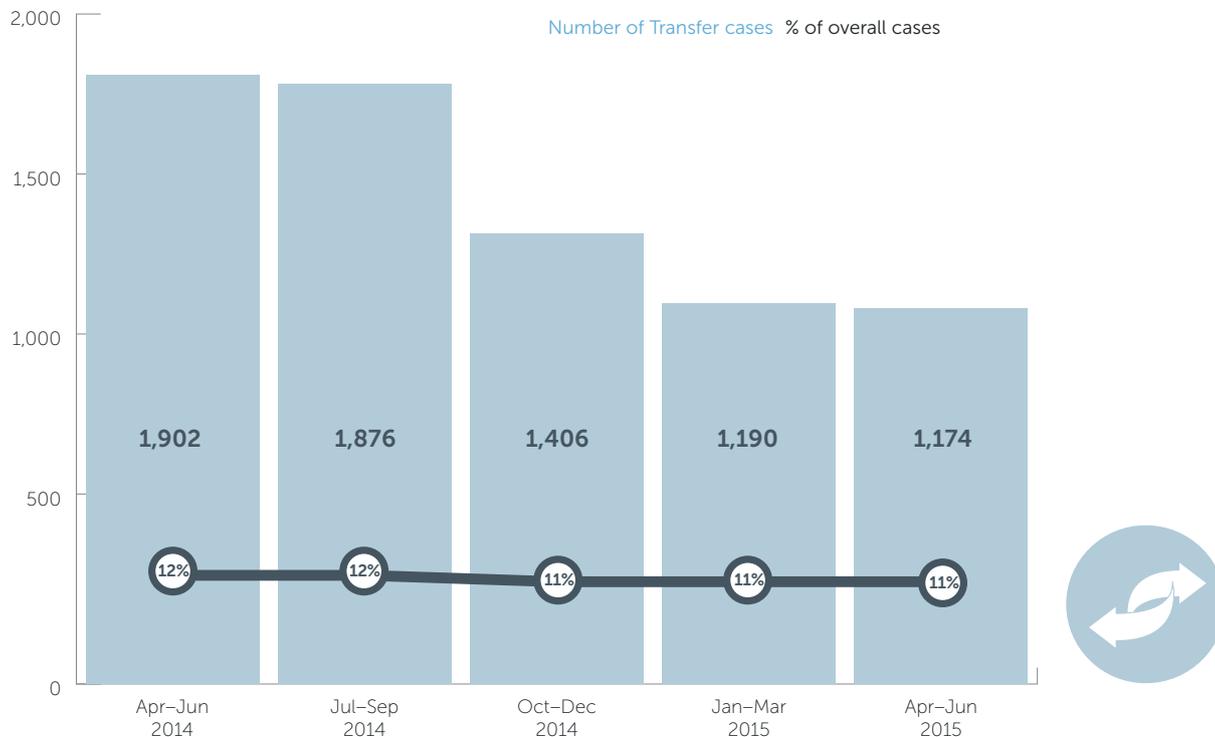
The retailer offered to put in place a payment plan of \$82 a fortnight, an amount which it calculated would cover both the customer's ongoing consumption and help reduce her arrears. It accepted the customer onto its hardship program, saying that it would assess her eligibility for a Utility Relief Grant and discuss listing the household as requiring electricity for medical reasons. The customer was satisfied with the proposed payment plan and offer of hardship assistance and the complaint was closed. 2015/10028

Our assessment of the circumstances surrounding the disconnection found that the retailer had followed the required steps before disconnecting the customer's electricity, so no Wrongful Disconnection Payment was due. WDP/2015/478

... three
\$85 payments
had been made, after
which the payments
dropped back to \$50.
There was no contact by
the customer to explain
why, or to say that \$85
wasn't affordable...

TRANSFER

FIGURE 6.
Transfer cases



COMPARED TO
LAST QUARTER

TRANSFER CASES



1%



COMPARED TO
THIS TIME LAST YEAR

TRANSFER CASES



38%



CASE STUDY

Customer disputes her responsibility to pay a delayed bill

In this case, the retailer wasn't able to meet the three-monthly billing obligations set out in the customer's contract because the distributor delayed its provision of metering data. While this was allowable under the retailer's contract terms and conditions and the Energy Retail Code, the retailer made the situation worse by not explaining the delay to the customer and then allowing it to affect her eligibility for a pay-on-time discount.

Having signed a contract at beginning of September 2014, the customer rang her electricity retailer in January 2015 to say she hadn't received a bill. The retailer undertook to send it by the end of the week. When the bill eventually arrived in late March 2015, it covered the first four months of her contract. Two weeks later, in April 2015, she received a second bill for the next three months of her contract. The second bill included the first bill as overdue, without application of her pay-on-time discount.

The customer maintained that the retailer hadn't met the terms of its contract with her, which stated that a bill would be issued every three months. The retailer said that, while this was ideal, it could still issue back bills notwithstanding the three-monthly billing clause in the customer's contract. The customer rejected its offers of extended payment terms and account credits. She paid the second bill, but insisted she shouldn't have to pay the disputed first bill of \$588.30.

Responding to our Investigation, the retailer confirmed it had sent the customer a delayed bill for four months' usage. It said the delay was due to the distributor not providing meter read data. It maintained that its billing complied with the *Energy Retail Code* and its contract terms and conditions, which allow for back billing and suspension of obligations that can't be met due to uncontrollable events.

Reviewing the retailer's contact notes, we found that by the time the customer made contact to say she hadn't received a bill, the retailer was already in touch with the distributor to obtain the missing meter data. Our review of the retailer's terms and conditions and actions concluded that these were in line with *Energy Retail Code*.

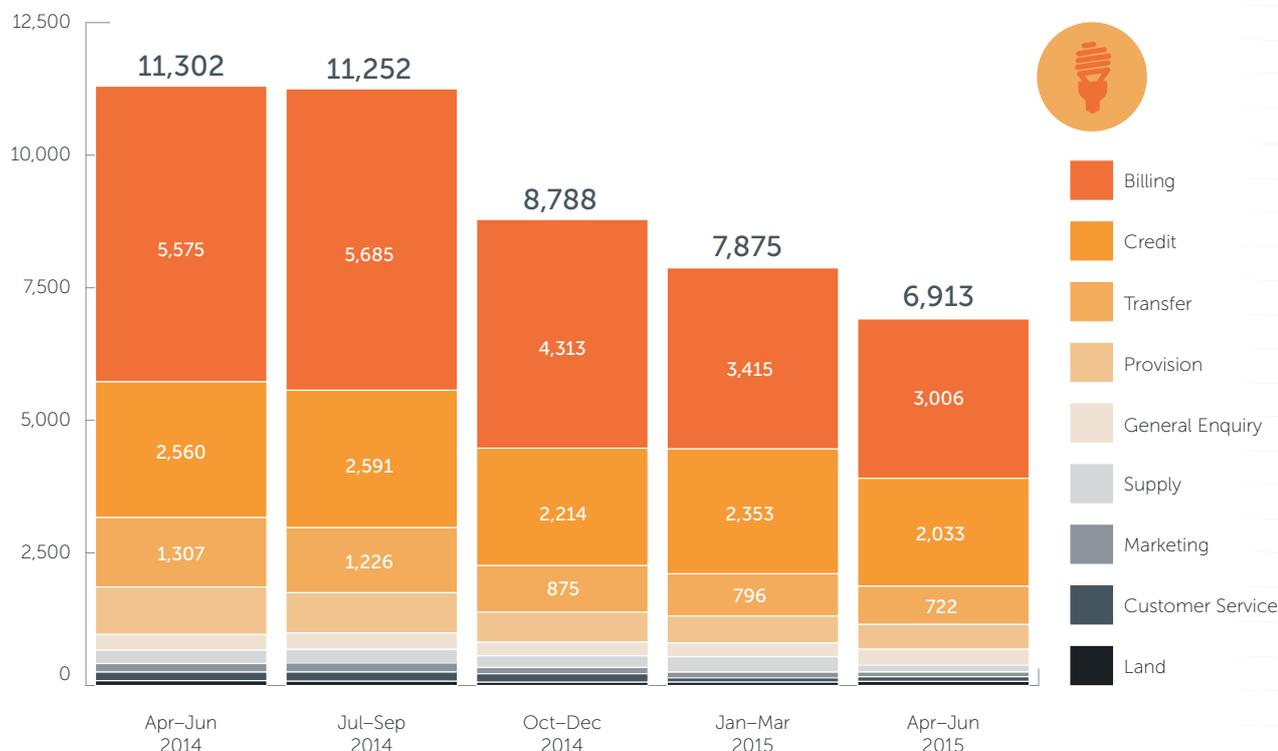
We assessed that a combination of the pay-on-time discount and a \$100 customer service credit would be a fair and reasonable resolution offer. We discussed our assessment with the customer, who accepted our review and requested equal time to pay the back bill in line with the *Energy Retail Code*.

The complaint was resolved when the retailer apologised to the customer, and credited her account with her backdated pay-on-time discount of \$171.14 and a customer service payment of \$100. A fortnightly instalment plan of \$77.73 was set up for the balance of \$488.58. 2015/10124

The customer maintained that the retailer hadn't met the terms of its contract with her, which stated that a bill would be issued every three months.

ELECTRICITY

FIGURE 7.
Electricity cases

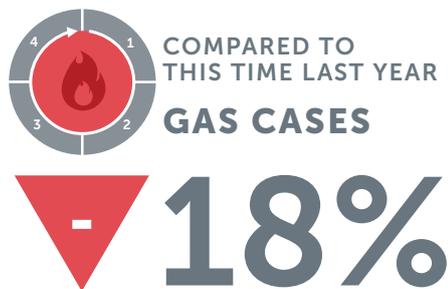
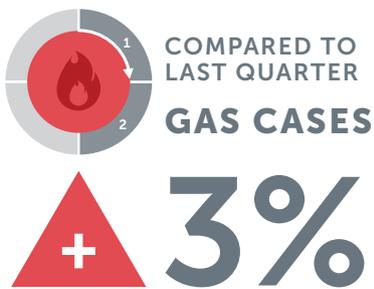
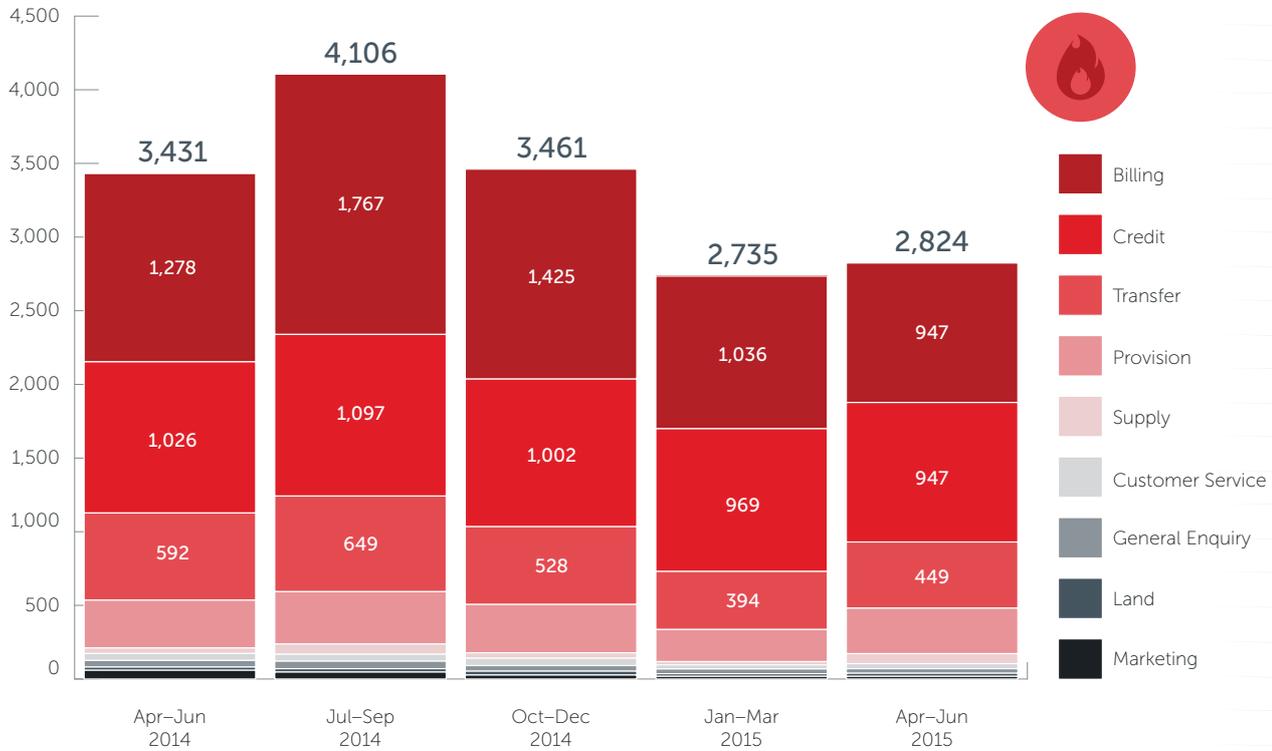



COMPARED TO LAST QUARTER
ELECTRICITY CASES
 **12%**


COMPARED TO THIS TIME LAST YEAR
ELECTRICITY CASES
 **39%**

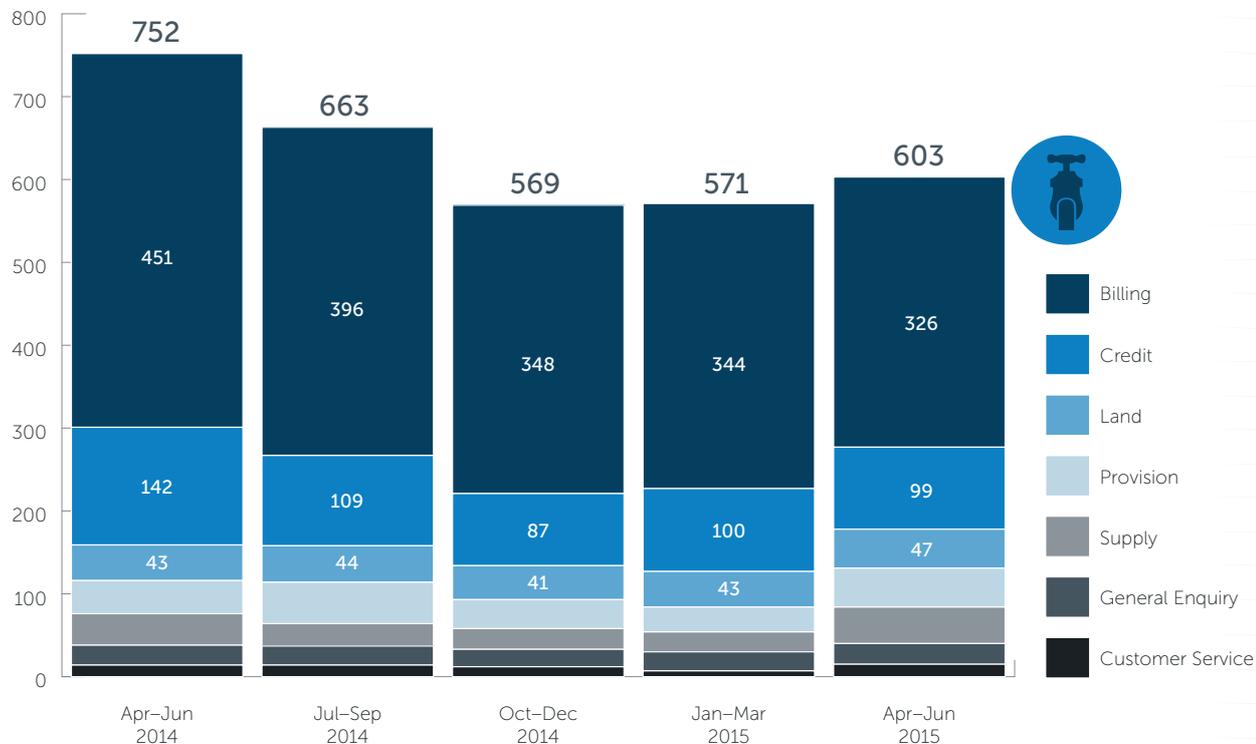
GAS

FIGURE 8.
Gas cases



WATER

FIGURE 9.
Water cases



COMPARED TO
LAST QUARTER
WATER CASES

+ 6%

COMPARED TO
THIS TIME LAST YEAR
WATER CASES

- 20%

SYSTEMIC ISSUES

Customer bills based on wrong meters after Smart Meter installation

Ten cases received by EWOV highlighted metering transposition problems. Some customers of one energy retailer were being billed on the wrong meters. The energy distributor confirmed a metering transposition issue during the Smart Meter rollout, which saw the wrong metering details assigned to some properties. To resolve the issue, the metering had to be checked and corrected onsite, so updated information could be sent to the retailer. The distributor said the manual correction was a lengthy process, but should be completed by the end of the month following EWOV's contact. Some 3,854 customers were affected. The regulator was notified. SI/2014/33

Prompt payment discount lost

In two cases received by EWOV, customers lost their prompt payment discount when they were transferred from one energy retailer to another after a retailer acquisition. The energy retailer confirmed a billing system issue affecting around 50,270 customers. Some customers received notification of a balance brought forward, despite paying the bill in full. The retailer said that, as soon as the issue was identified, it applied manual credits to the accounts of all affected customers and took steps to ensure they'd receive their prompt payment discount in future. The regulator was notified. SI/2014/48

Billing system fault meant network demand charges weren't passed through to business customers

Three cases to EWOV showed that application of demand charges to the accounts of around 50 business customers was delayed. Even though (in the cases lodged with EWOV) the energy retailer didn't backdate the charges, the situation created confusion and some budgeting difficulties for customers. The retailer confirmed a billing system fault. It said it had notified affected customers of the error and it wouldn't pursue the delayed charges. It also offered them the opportunity to change to a non-demand charge network tariff if they wished. The regulator was notified. SI/2015/3

Telemarketing by a new energy retailer

In nine cases received by EWOV, customers contacted by telemarketers complained about pressure sales or transfers without consent. The energy retailer concerned confirmed its use of a variety of methods to establish its customer base. It said that, as a result of the complaints to EWOV, it had ceased using its third-party telemarketing sales channel. It said it was contacting all customers contracted through telemarketing to ensure their consent had been obtained. The regulator was notified. SI/2015/15

Wrong due dates on reminder and disconnection notices

An energy retailer alerted EWOV to an issue with a batch of reminder and disconnection notices, which included a due date that was one day before the notices were issued. This meant the customers couldn't pay on time. We received no cases about the issue, but understand some 600 customers were affected. The retailer confirmed a billing system fault, which had since been addressed. It said affected customers were contacted with a revised due date, with no disconnections. The regulator was notified. SI/2015/24

Billing system issue meant payment extensions weren't being processed

An energy retailer alerted EWOV to an issue around customer requests for payment extensions. Even though the customers' accounts were subsequently protected from collection and disconnection action in its billing system, the reminder notice sequence continued. We received one case and believe some 600 customers may have been affected. The retailer confirmed a system solution, after which all affected customers were contacted to reconfirm their payment arrangement. No related disconnections took place. The regulator was notified. SI/2015/25

Wrong due dates on bills

One case to EWOV highlighted a billing problem wherein bills included a pay-by date that was before the date the bill was issued. The energy retailer confirmed an invoice-related system error, which resulted in bills for three billing runs showing an incorrect due date. It said the system issue had been addressed. The bills were reversed and collection activity was stopped. Some 4,691 customers were affected. The retailer said none of them had their supply disconnected and all were sent revised bills. The regulator was notified. SI/2015/30

'To the occupier' disconnection notices from a retailer the customer didn't recognise

Five cases to EWOV about one energy retailer were from people who weren't its customers, but who received disconnection notices from the retailer addressed 'to the occupier'. The retailer told us that a hold on a group of 'unknown occupier' accounts with arrears back to 2011 and 2012 was accidentally released. It said it contacted some 1,750 affected customers to apologise and say they should disregard the notice. It said no affected sites were disconnected. The regulator was notified. SI/2015/32

PUBLIC SUBMISSIONS

Inquiry into the Financial Hardship Arrangements of Energy Retailers – Our Approach ***Essential Services Commission (ESC)***

Our submission to this ESC paper highlighted EWOV's increased analysis and reporting on issues of energy affordability and financial hardship, including our introduction of a quarterly [Affordability Report](#) and publication of a research report, [A closer look at affordability: An Ombudsman's perspective on energy and water hardship in Victoria](#). We addressed some specific issues around trends in credit cases to EWOV, our approach to hardship cases, energy retailers' hardship policies and practices, and the importance of the regulatory framework. We also pointed to our affordability research report as a source of further information on EWOV's position on several of the specific issues in the ESC inquiry's Terms of Reference and *Our Approach* consultation questions.

[Full submission on the EWOV website](#)

Draft rule determination – Expanding competition in metering and related services ***Australian Energy Market Commission (AEMC)***

We drew on almost six years' experience of receiving complaints associated with the Smart Meter rollout across Victoria, to provide an overview of the common types of Smart Meter complaints.

[Full submission on the EWOV website](#)

Metering Data Provision Procedures – Consultation Paper ***Australian Energy Market Commission (AEMC)***

We focused our comments on the proposed minimum summary and detailed data formats, specifically the accessibility for customers of certain file types, and the proposed level of detail around information on estimated reads and index reads, which we believe should be expanded.

[Full submission on the EWOV website](#)

GLOSSARY

If you would like to know more about EWOV's issue and complaint terminology, visit our [website](#) for a complete glossary.