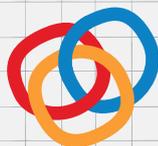




# Res ONLINE



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

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# THE OMBUDSMAN'S VIEW

## High bills deliver 'bill shock'

In this issue of *Res Online*, we discuss the increased number of customers complaining to EWOV about high electricity and/or gas bills. Our feature article reports on our recent handling of high bill complaints, with some short examples. Essentially, it highlights shared responsibilities in this space. Customers need to be more aware of how they use their appliances and take responsibility for managing their consumption and therefore their bills. Retailers need to do more to properly assess 'high bill' issues at a customer's first contact and help address the situation in line with their responsibilities under the *Energy Retail Code*.

[Issues watch](#)

## Other case studies in this issue

- [Disputed high bill turns out to be accumulated arrears \(billing\)](#)
- [Electricity had been disconnected and gas was about to be \(credit\)](#)
- [Retailer switch blocked due to arrears \(transfer\)](#)

## 2017 Annual Report

2016-17 delivered EWOV an 11% fall in energy and water cases. The top customer complaint was energy disconnection/water restriction, followed by high bill, debt collection/credit default listing, provision at an existing connection, and billing error.

We attribute the 11% fall to better complaint handling by energy and water companies.

However, we remain concerned about affordability and the capacity of many customers to stay on supply.

EWOV continues to find itself dealing with a high proportion of complex complaints, many of them from customers in vulnerable situations.

There were also some increases, most noticeably in cases about:

- provision of an energy or water connection (up 23%)
- how company activities or network assets affect land or property (up 15%)
- the actual supply of energy or water (up 11%)
- marketing by electricity and gas retailers to gain new customers (up 8%).

[EWOV's 2017 Annual Report \(PDF\)](#)

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

[2017 Annual Report online, including video summary and data visualisations](#)



**Cynthia Gebert**

Energy and Water Ombudsman (Victoria)



**Cynthia Gebert**  
Energy and Water Ombudsman (Victoria)

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

# THE BIG PICTURE

JULY - SEPTEMBER 2017

Compared to last quarter:

CASES **+23%**

ENQUIRIES **no change**

UNASSISTED REFERRALS **+15%**

ASSISTED REFERRALS **+29%**

INVESTIGATIONS **+17%**

**8,653** CASES

349 ENQUIRIES

**8,304** COMPLAINTS

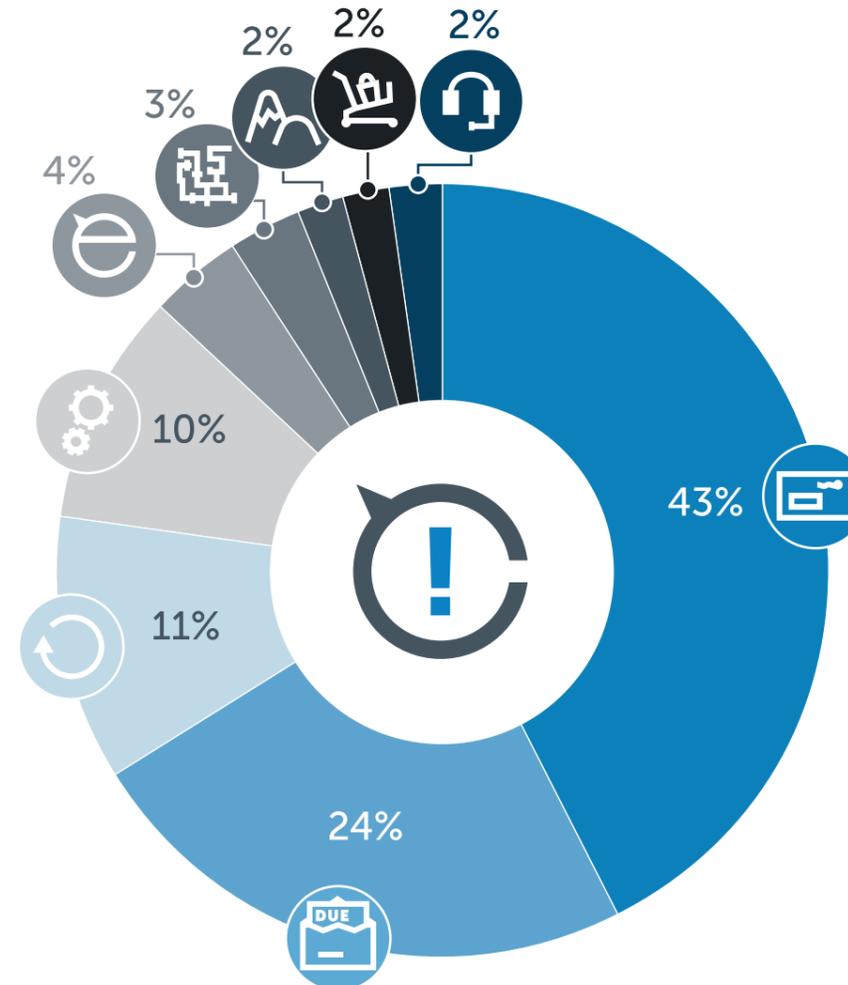
**5,562** ASSISTED REFERRALS

**1,302** UNASSISTED REFERRALS

**1,440** INVESTIGATIONS

1,381 were finalised

## The issues customers complained about



Compared to last quarter:

BILLING **3,724** cases **+44%**

CREDIT **2,064** cases **+14%**

TRANSFER **951** cases **+19%**

PROVISION **890** cases **-5%**

GENERAL ENQUIRY **307** cases **+15%**

SUPPLY **285** cases **+11%**

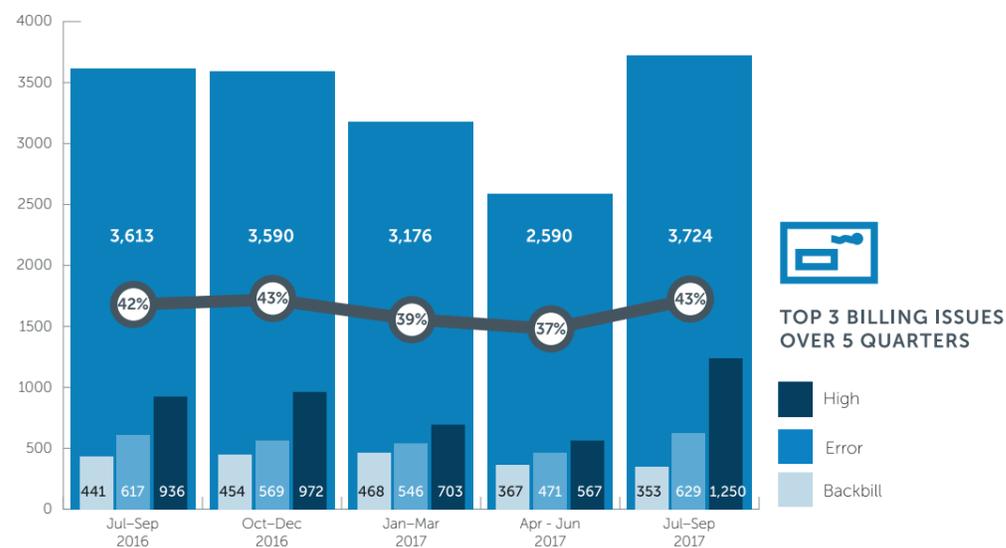
MARKETING **150** cases **+34%**

CUSTOMER SERVICE **143** cases **+34%**

LAND **139** cases **-6%**

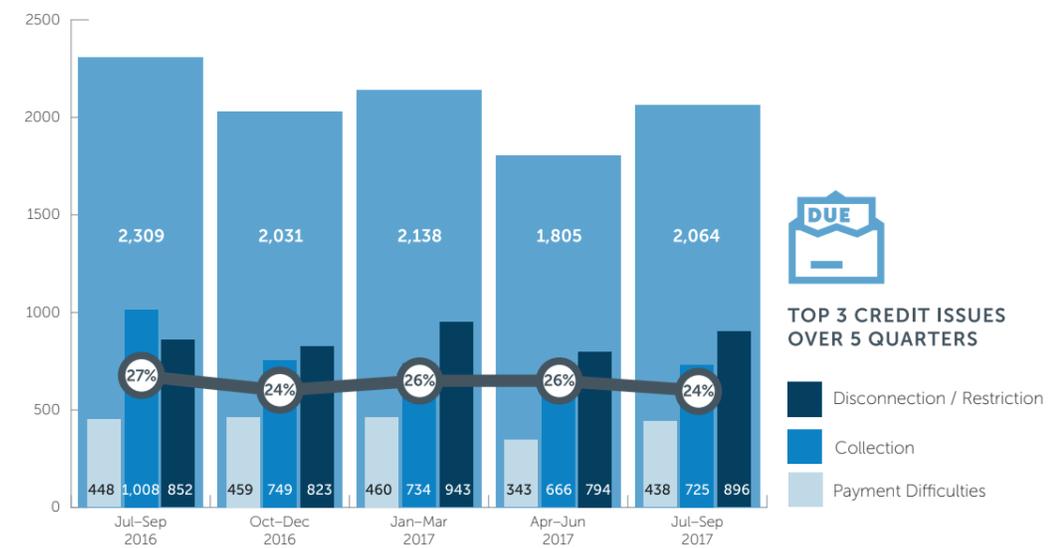
## Billing cases

Number of Billing cases % of overall cases



## Credit cases

Number of Credit cases % of overall cases



# ISSUES WATCH:

## More customers complaining about high energy bills

### What EWOV's cases show

#### Overall: July to September 2017

3,724 customers contacted us with a billing issue this quarter:

- up 44% from 2,590 customers in the April to June 2017 quarter
- up 3% from 3,613 customers in the July to September 2016 quarter.

1,250 (34%) of the 3,724 customers complained about one or more high bills:

- up 120% from 567 customers in the April to June 2017 quarter
- up 34% from 936 customers in the July to September 2016 quarter.

#### Electricity: July to September 2017

2,029 electricity customers contacted us with a billing issue this quarter:

- up 31% from 1,545 customers in the April to June 2017 quarter
- one more customer than in the July to September 2016 quarter.

585 (29%) of the 2,029 customers complained about one or more high electricity bills:

- up 116% from 271 customers in the April to June 2017 quarter
- up 43% from 408 customers in the July to September 2016 quarter.

#### Gas: July to September 2017

1,368 gas customers contacted us with a billing issue this quarter:

- up 74% from 786 billing cases in the April to June 2017 quarter
- up 11% from 1,233 billing cases for the July to September 2016 quarter.

506 (37%) of the 1,368 customers complained about one or more high gas bills:

- up 212% from 162 cases in the April to June 2017 quarter
- up 55% from 327 cases in the July to September 2016 quarter.

### What we found in our resolution of high bill complaints

- Customers shocked at the size of the bill, and saying they'd have trouble paying it
- Customers more concerned about how much they had to pay, not how much energy they'd used
- Customers with limited understanding of how they were using energy
- More often than not the bill complained about was correct

Many of the complaints investigated by EWOV this quarter fell into the 'bill shock' category. The customer wasn't expecting a bill of that size and said they didn't understand how it came about. Commonly, they thought the meter was faulty and wanted a meter test. In most cases, the meter was found to be operating correctly and the bill was based on meter reading data. In many cases, the customer just needed help to manage/time to pay the debt they unexpectedly found themselves with.

## Shared responsibilities

### Customers

What we were told by customers who lodged a high bill complaint with EWOV over the last quarter is revealing. It's clear that customer education around responsibilities must be ongoing. We suggest this include reminders that customers should:

- use bills to track their consumption, as well as what they owe
- understand and consider how much energy (or water) they're using
- take notice of price rises and think about how their bills may be affected
- ask about any concessions they may be entitled to
- contact their retailer as soon as they realise they're going to have difficulty paying.

Customers are able to shop around for a better energy deal. Online tools—such as the State Government's independent comparison tool, *Victorian Energy Compare* — compares energy offers to help customers find contracts that suit their household or small business: <https://compare.switchon.vic.gov.au/>

EWOV's fact sheets, also published online, are another source of easy to follow information about billing:

- [High electricity and natural gas bills](#)
- [High water bills](#)
- [Energy and water payment difficulties](#)
- [Disconnection and restriction for debt](#)

### Retailers

EWOV's handling of high bill complaints also raises questions about how well energy retailers are delivering on their responsibility to assist customers who complain about high billing. Retailers have a responsibility to help their customers. Simply maintaining that the meter is operating properly and the bill is correct is not helpful. Frontline staff must be given the tools to assess high bill complaints properly at first contact. They must be able to discuss how the customer is using energy (or water) and explain how that may be driving their bills up.

Under the *Energy Retail Code*, retailers have responsibilities to:

- review bills
- arrange for check meter reads
- test the meter (at the customer's cost if the meter or metering data proves not to be faulty or incorrect; customers in Victoria aren't required to pay for a meter check or test in advance)
- assist customers under a 'customer hardship policy', including to:
  - make sure that staff are aware of the policy and skilled in engaging sensitively with hardship customers
  - monitor payments, including accumulation of debt
  - offer fair and reasonable payment options that accommodate particular customer circumstances
  - provide referral to support agencies
  - explain the availability of field audits of usage and replacement of appliances (as appropriate to individual circumstances).

## High bill stories from EWOV's July to September 2017 case files

### **Fall in electricity consumption indicates something was turned off**

The customer thought her high quarterly electricity bill was due to peak rate billing. Her electricity retailer maintained the bill was correct and the meter was working correctly. EWOV's Investigation of the unresolved complaint confirmed the billing was correct and based on data taken from the meter at the property she was renting. The meter was tested and found to be operating correctly. We reviewed the customer's electricity consumption and metering information back to February 2017. This showed her consumption increased from April 2017 and peaked in July 2017. It also showed an overnight load of about 2.4kW until early August 2017. Based on our experience, we concluded that the customer's April to July consumption pattern was in line with winter consumption patterns. The disappearance of the overnight load in early August indicated to us that something (possibly a heater) had been turned off (perhaps prompted by our Investigation). 2017/15615

### **Use of air-conditioner during heatwave**

The customer had been renting a property in regional Victoria for just over six months. He complained about the size of his electricity bill, saying his appliance usage was essentially a fridge, television, mobile phone charging, kettle, and reverse-cycle ducted heating and cooling. He said he used gas for cooking and hot water. The electricity retailer maintained the bill was correct and the meter was working correctly. Our Investigation of the unresolved complaint confirmed the billing was correct. We identified the customer's use of the air-conditioner during a three-day heatwave in February 2017 as the reason the bill was so high. 2017/8279

### **Cold winter – more gas used**

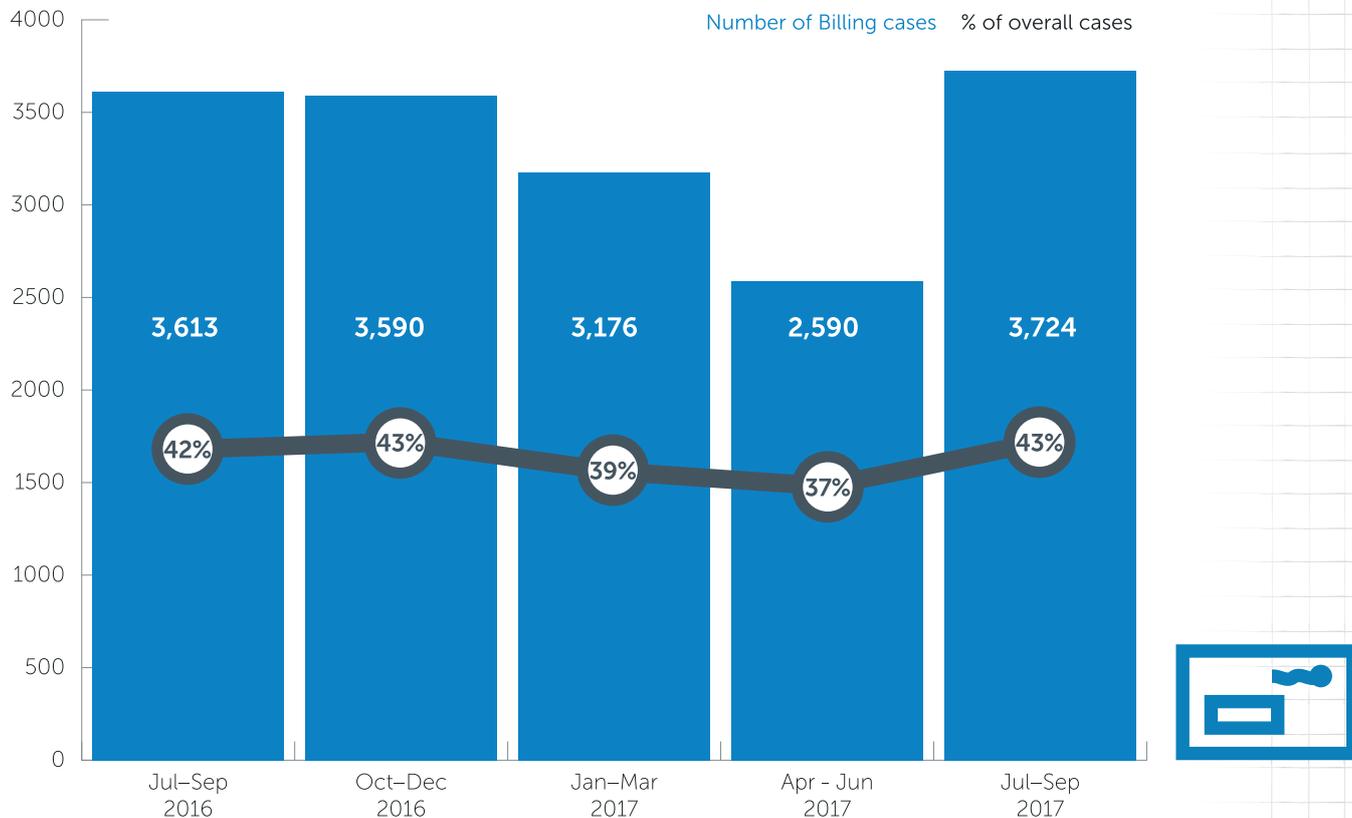
The customer was an Office of Housing tenant in regional Victoria. She was upset at receiving a gas bill for \$323.85, because her bill for the same two-month period in 2016 was \$222.93. She thought the gas meter may have been damaged when it was hit by a vehicle. The gas retailer maintained the bill was correct and the meter was working correctly. Our Investigation of the unresolved complaint confirmed that the customer's billing was correct and based on actual meter readings. The meter was found to be operating correctly. We assessed that the customer had used more gas during winter this year, and provided her with information about how to use her gas heater more efficiently. 2017/15716

### **Water usage driving high bulk hot water bills**

The customer had been renting her property for a year. She lived alone for the most part and was at work during the day. She said her bulk hot water bills were higher than her electricity bills and didn't reflect the amount of hot water she used. She'd checked with other tenants in the building who had similar lifestyles and found their bills were quite a bit lower. We assessed that her hot water consumption was higher than usual. We arranged for the meter to be tested. The gas retailer maintained the billing was correct, but conceded the consumption did sound higher than usual. Our Investigation concluded that the bills were correct and the meter was operating correctly. We arranged for a site visit and water usage appliance tests at the property. It was suggested that the customer downsize her shower head as this appeared to be a contributing factor. While we were investigating her complaint, the customer's hot water consumption fell. 2017/10236

# BILLING

FIGURE 1  
Billing cases



COMPARED TO  
LAST QUARTER  
**BILLING CASES**



**44%**



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



**3%**



## Billing Case Study: Disputed high bill turns out to be accumulated arrears

*Unpaid bills; customer switches retailer*

**Case number:** 2017/14180

In early July 2017, Mr L received a quarterly electricity bill for \$2,178.09. He disputed the bill because he was using energy efficient appliances and there were only two occupants in the property. When Mr L rang EWOV, he was seeking a meter reading and an amended bill. He also said he was looking to switch retailer, once he'd paid the amended bill.

We registered Mr L's complaint as an Assisted Referral and facilitated contact with him by a higher-level contact within the electricity retailer. Mr L switched retailer just over a week later. He returned to EWOV with his complaint a month later. We opened an Investigation, and Mr L offered to pay \$200 (as an undisputed amount) towards the bill while we investigated.

Responding to EWOV's Investigation, the electricity retailer told us that Mr L was on a peak anytime tariff. It said all of his billing was based on meter reading data provided by the local electricity distributor. The most recent meter reading was in mid-July 2017. The retailer said that Mr L's bills were consistently between \$400 and \$600 a quarter depending on the time of year. The retailer put the unexpectedly high bill down to accumulated arrears on the account. The retailer provided us with Mr L's bills back to May 2016.

Our Investigation concluded that the billing was based on meter reading data from the electricity distributor. We could see that Mr L hadn't made an electricity payment since late October 2016. Bills of \$866.97 in December 2016 and \$1,536.87 in March 2017 remained unpaid. By switching retailer (and closing the electricity account) Mr L lost any entitlement he may have had to a Utility Relief Grant, if he had been in a hardship situation.

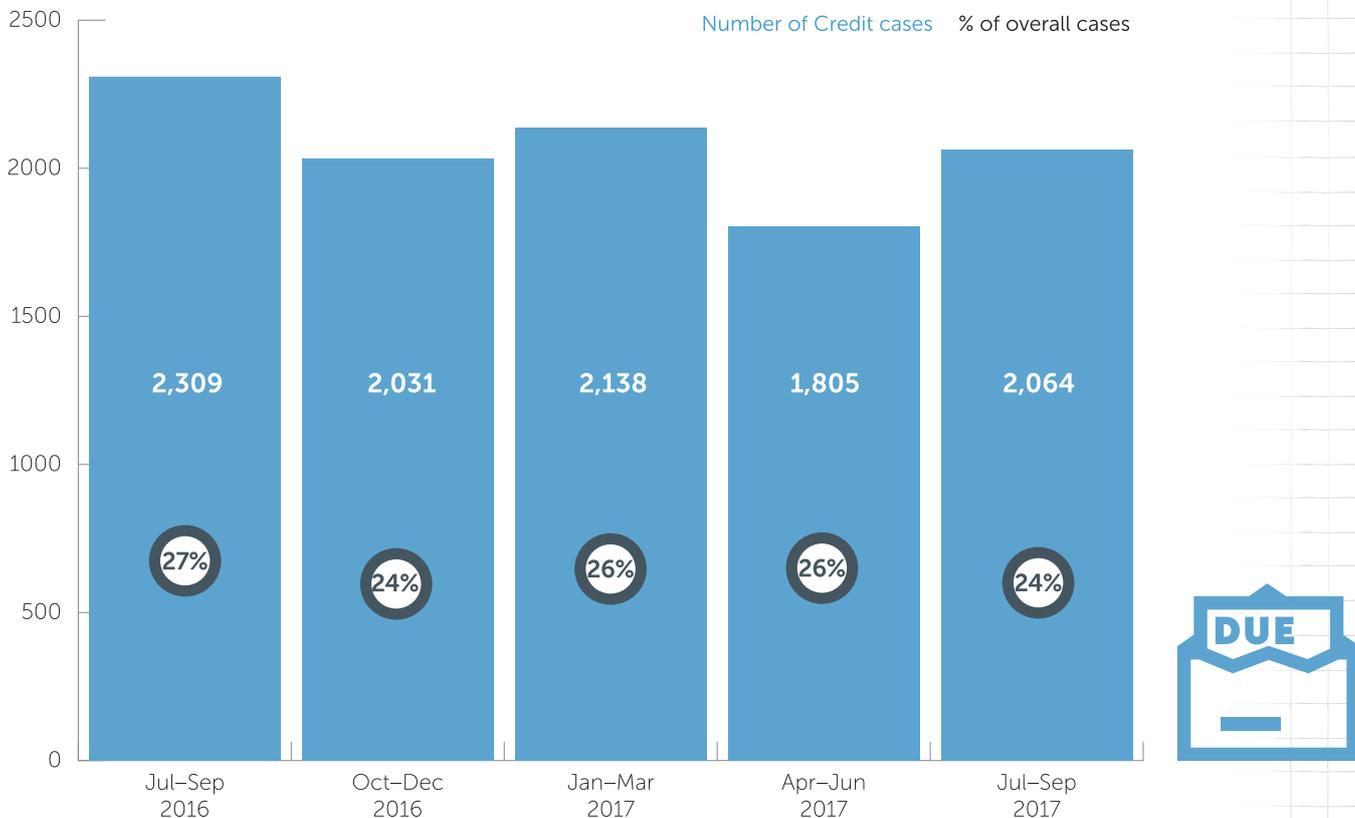
In resolution of the complaint, the retailer offered him 14 days to pay the debt of \$2,590.25 in full or set up a suitable payment plan. In the absence of action by Mr L, the retailer would take collection action on the arrears.

Mr L was satisfied with this outcome and the complaint was closed.

**By switching retailer Mr L lost any entitlement he may have had to a Utility Relief Grant, if he had been in a hardship situation.**

# CREDIT

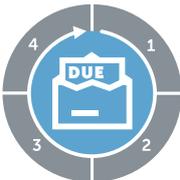
FIGURE 2  
Credit cases



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


**COMPARED TO  
LAST QUARTER**  
**CREDIT CASES**  

**14%**


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

**11%**



## Credit Case Study: Electricity had been disconnected and gas was about to be

*Large arrears; difficult financial situation; customer restored to retailer's hardship program*

**Case numbers:** 2017/13977 and 2017/13978

Ms E, a disability pensioner, lived in an Office of Housing property. When she complained to EWOV in July 2017, she owed \$6,143.66 for electricity and \$1,477.12 for gas. Her electricity had been disconnected and her gas was about to be. She said she hadn't received disconnection notices, and didn't understand why her gas was marked for disconnection when she'd been making payments of \$50 a fortnight for the past five months. She acknowledged that she hadn't made an electricity payment for at least 12 months, saying this was due to having to pay ongoing medical expenses for her child. Ms E wanted the retailer to assess her for hardship assistance, and accept a payment plan of \$50 a fortnight for her electricity. She undertook to maintain her current gas payments.

Due to the supply disconnection and the customer's affordability issues, we moved straight to an Investigation. We arranged for Ms E's electricity to be reconnected while we investigated.

We confirmed that the last payment made by Ms E to her electricity account was \$60 in August 2016. She'd resumed paying her gas bills in March 2017, with her most recent payment being \$50 in July 2017. Fortnightly, she used \$78 of electricity and \$64 of gas. The retailer provided us with billing information for both accounts and its notes from contacts with Ms E. It said these showed she hadn't responded to calls, letters, emails or SMS. It said it had sent multiple overdue and disconnection letters, as well as reminder emails. When Ms E didn't respond, it started the disconnection process.

We found that, although it had referred Ms E to a financial counsellor, the retailer hadn't discussed a formal payment plan arrangement with her. It said she had previously been provided with assistance under its hardship program, but was removed from the program when she didn't make the necessary payments. It offered her electricity and gas payment plans of \$50, to be reviewed after three months. At that time, Ms E would have to increase her payments to match her usage or reduce her usage to affordable levels. The retailer also offered her an electricity incentive plan of \$78 a fortnight with matching incentive credits if she could make payments of those amounts. Similarly in gas, it offered her a gas incentive plan of \$64 a fortnight. It confirmed Annual Electricity Concession discounts had already been applied to her electricity account, but it reinstated a 28% Guaranteed Discount Plan which had expired in early July 2017. In gas, it reinstated a 15% Guaranteed Discount Plan which had expired in early July 2017. It also applied Winter Energy Concession discounts to her gas account. It noted that Ms E would soon be eligible to re-apply for electricity and gas Utility Relief Grants.

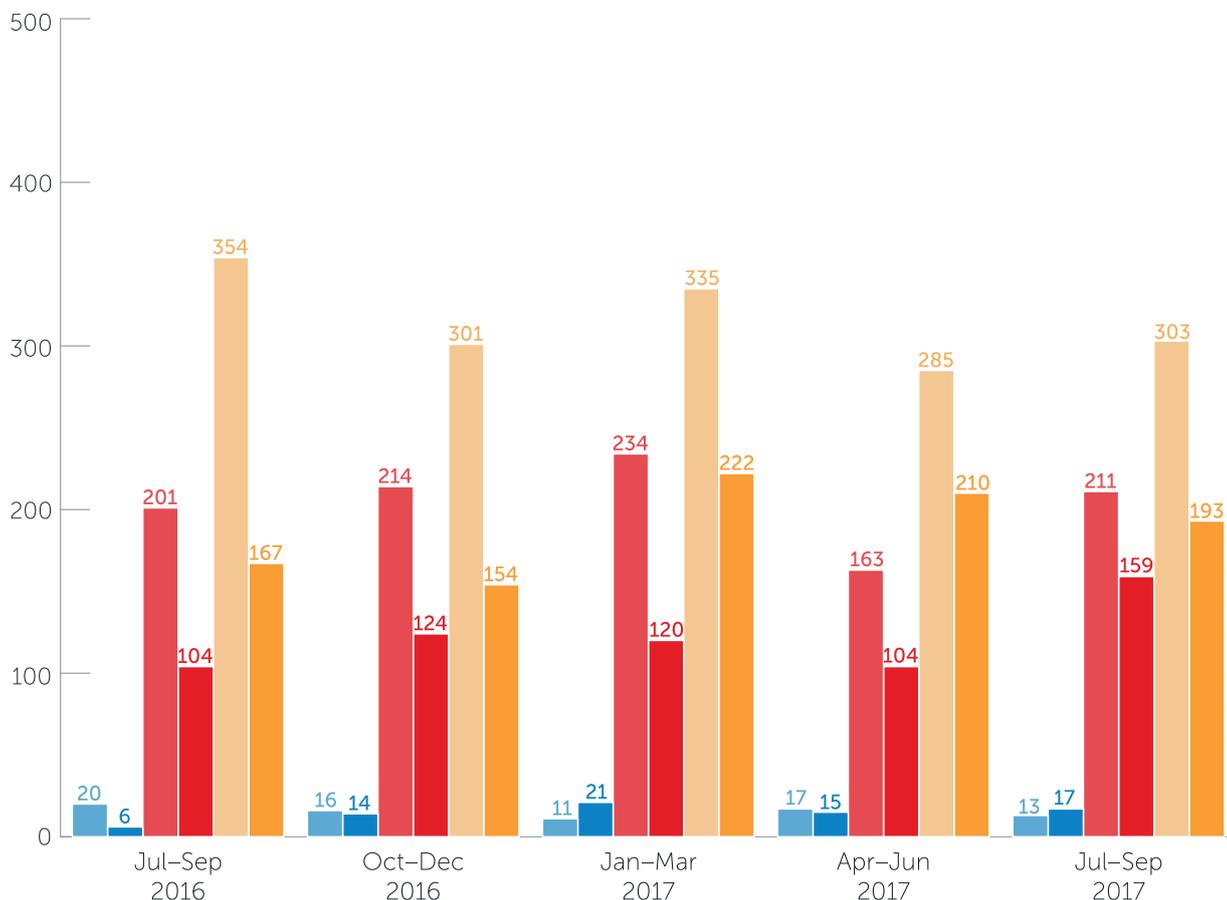
We advised Ms E to work on reducing her electricity and gas usage to affordable levels. She agreed to seek energy efficiency advice. We also recommended that she maintain close contact with the retailer's hardship team. She was satisfied with these outcomes and the complaints were closed.

For the purposes of the Wrongful Disconnection Payment, EWOV's assessment of the retailer's compliance with the *Energy Retail Code* prior to disconnecting a customer is still ongoing.

We advised Ms E to work on reducing her electricity and gas usage to affordable levels.

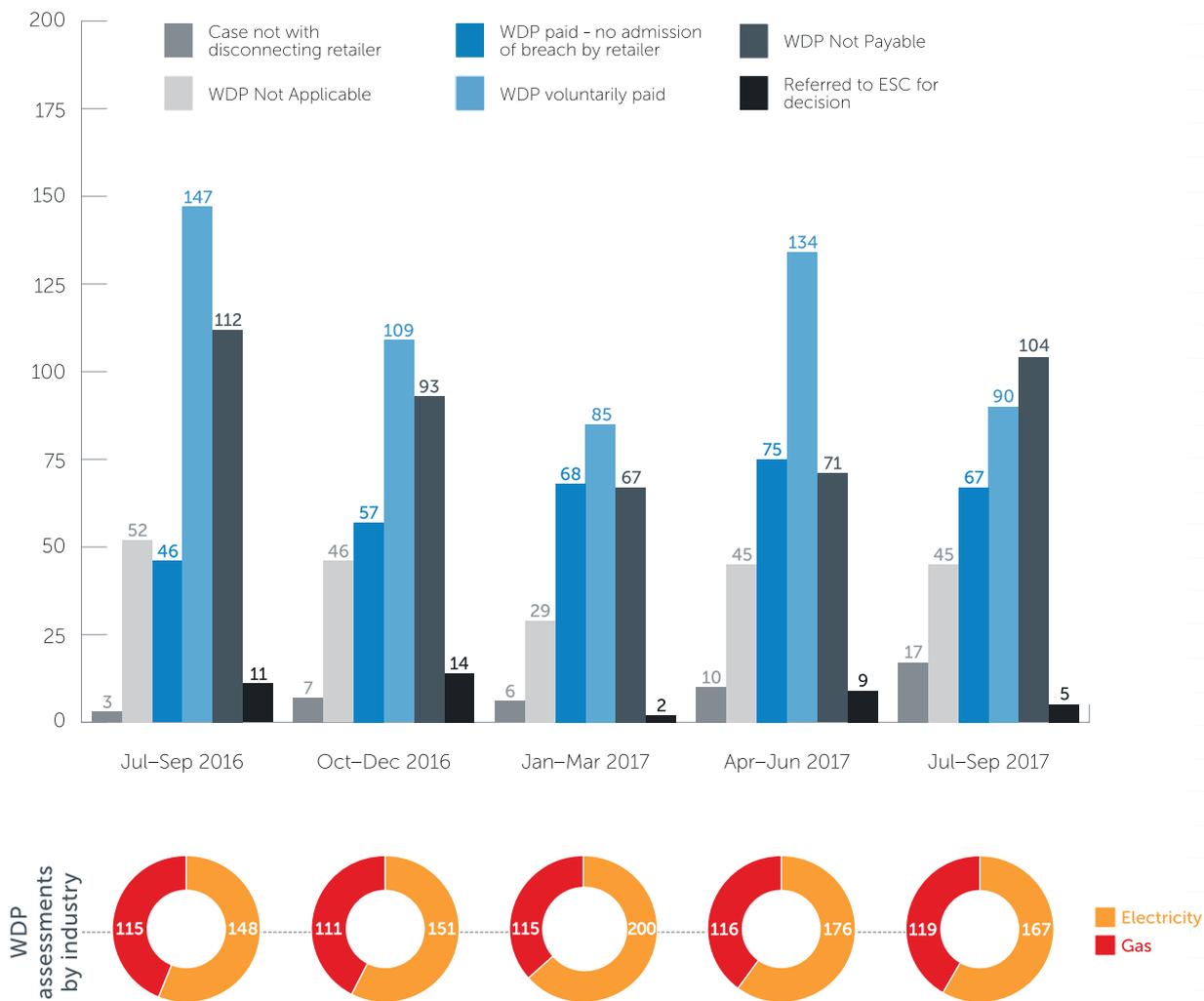
FIGURE 3

Credit-related disconnection and restriction cases



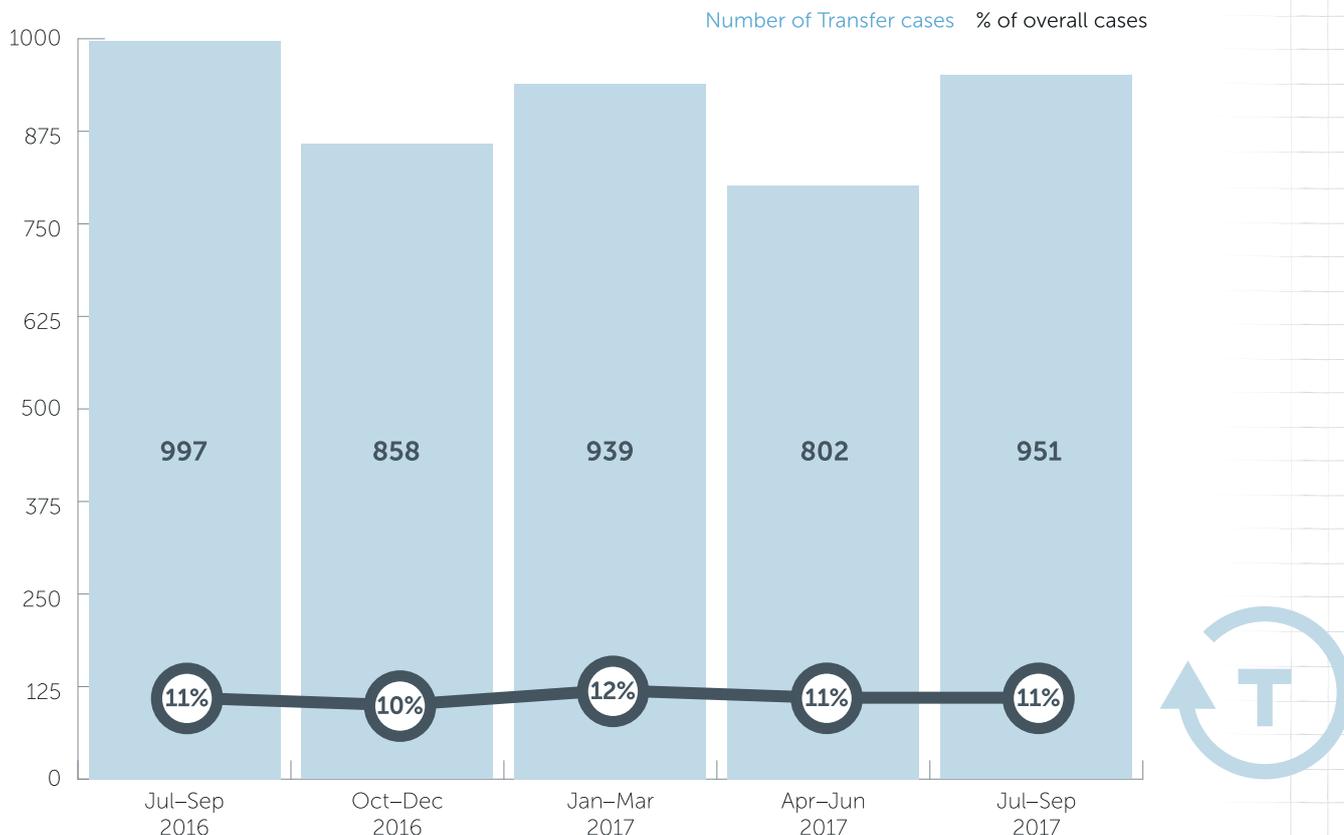
Note: The disconnection data in this report does not include LPG Deliveries Stopped cases.

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



# TRANSFER

FIGURE 5  
Transfer cases




**COMPARED TO LAST QUARTER**  
**TRANSFER CASES**  
 **5%**


**COMPARED TO THIS TIME LAST YEAR**  
**TRANSFER CASES**  
 **3%**



## Transfer Case Study: Retailer switch blocked due to arrears

*Account arrears; transfer blocked; payment plans agreed*

**Case number:** 2017/15990 and 2017/15989

Ms J, an Office of Housing tenant, wanted to switch energy retailer because her current retailer's payment plan option wasn't working for her. She said her energy retailer refused to close her accounts to let her switch, because she had account arrears of \$768.52 for gas and \$455.95 for electricity.

Ms J wanted to be able to pay the arrears off at \$25 a fortnight after she switched retailer.

When Ms J rang us, we registered the complaint as an Assisted Referral and facilitated contact with her by a higher-level contact within the energy retailer. When she remained dissatisfied with the retailer's response, we opened an Investigation.

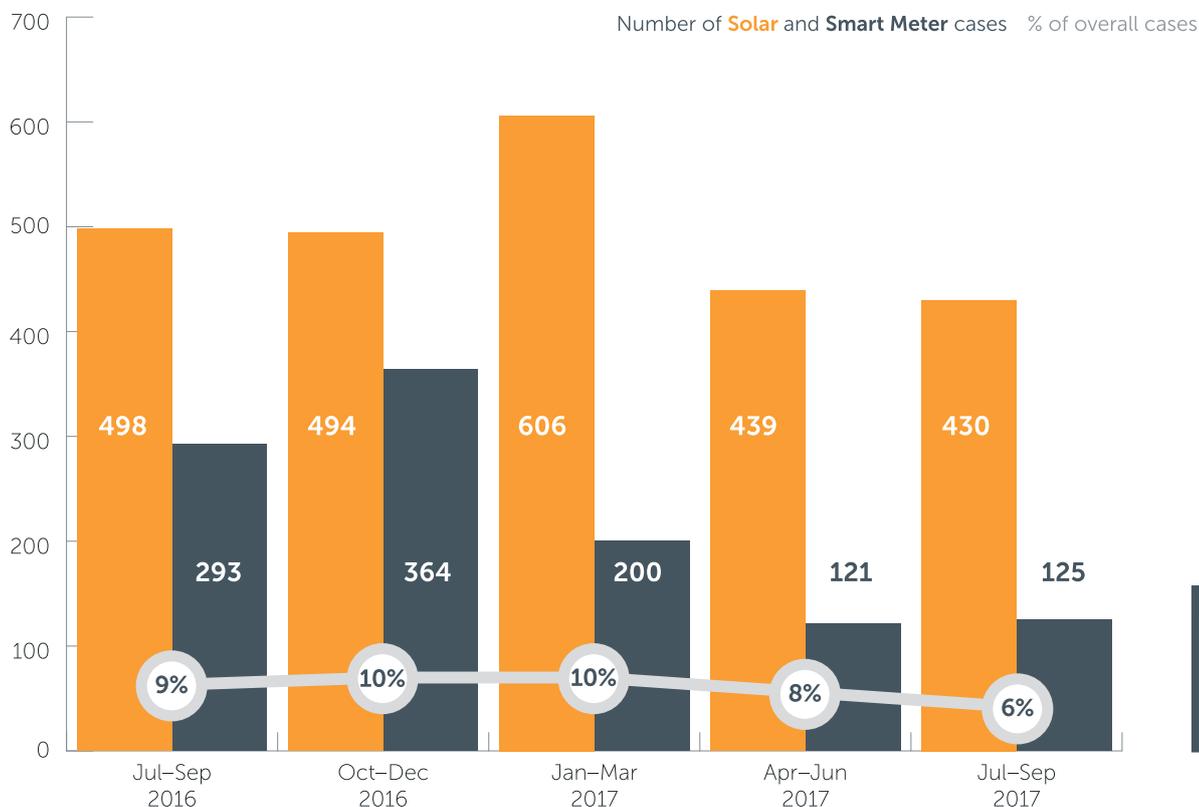
Responding to EWOV's Investigation, the energy retailer agreed not to object to the transfer. It offered to give Ms J six months to pay the arrears off, on fortnightly payment plans of \$59.12 for gas and \$35.07 for electricity. Ms J told us she could afford to pay a total of \$200 a month (for gas and electricity combined) towards her arrears. On this basis, the retailer set up a payment plan of \$50 a fortnight towards to each account.

Ms J was satisfied with this outcome and the complaints were closed.

She said her energy retailer refused to close her accounts to let her switch, because she had account arrears ...

# SOLAR AND SMART METERS

FIGURE 6  
Solar and Smart Meter cases



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



**2%**



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



**14%**

## Trends

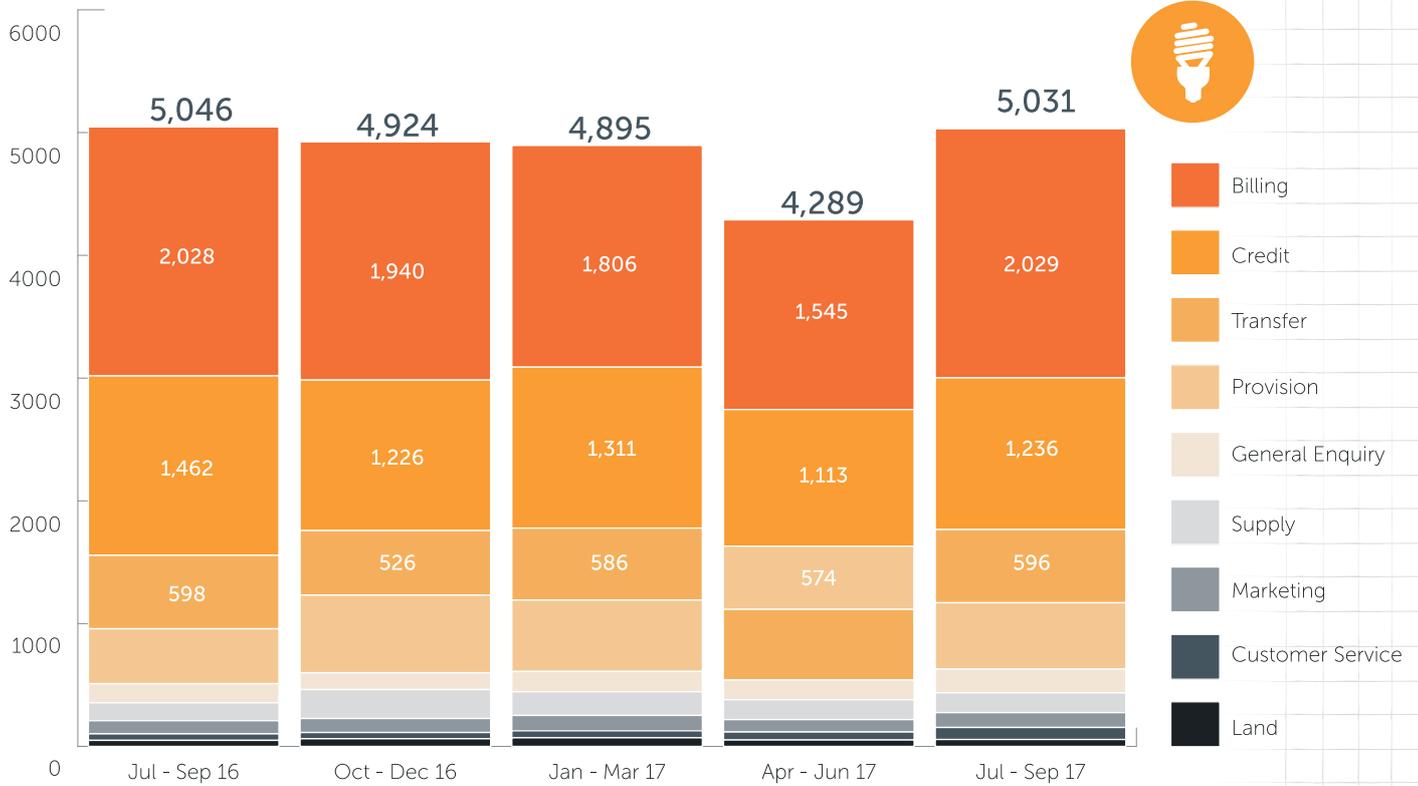
Solar and Smart Meter cases (combined) made up 6% of all EWOV cases in the July to September 2017 quarter. In the April to June 2017 quarter it was 8%, and in the July to September 2016 quarter it was 9%.

Solar cases were down 2% compared to those for the April to June 2017 quarter and down 14% against the July to September 2016 quarter. The most common solar issues were billing, specifically tariffs and provision at an existing connection.

Smart Meter cases were up 3% against the April to June 2017 quarter, but down 57% against the July to September 2016 quarter. The most common Smart Meter issues were high bill and provision at an existing connection.

# ELECTRICITY

FIGURE 7  
Electricity cases



COMPARED TO LAST QUARTER  
**ELECTRICITY CASES**

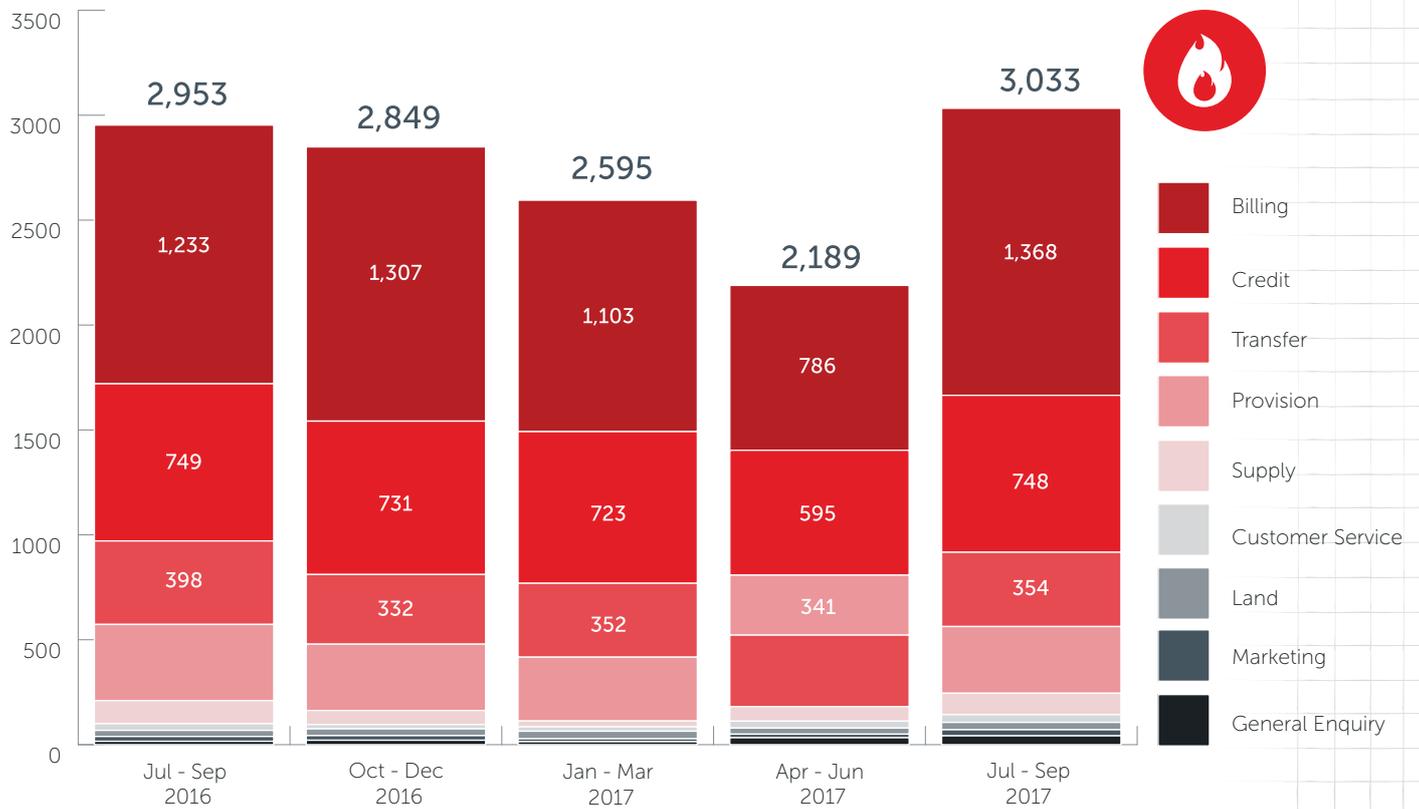
**+ 17%**

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

**no change**

# GAS

FIGURE 8  
Gas cases




**COMPARED TO LAST QUARTER**  
**GAS CASES**  

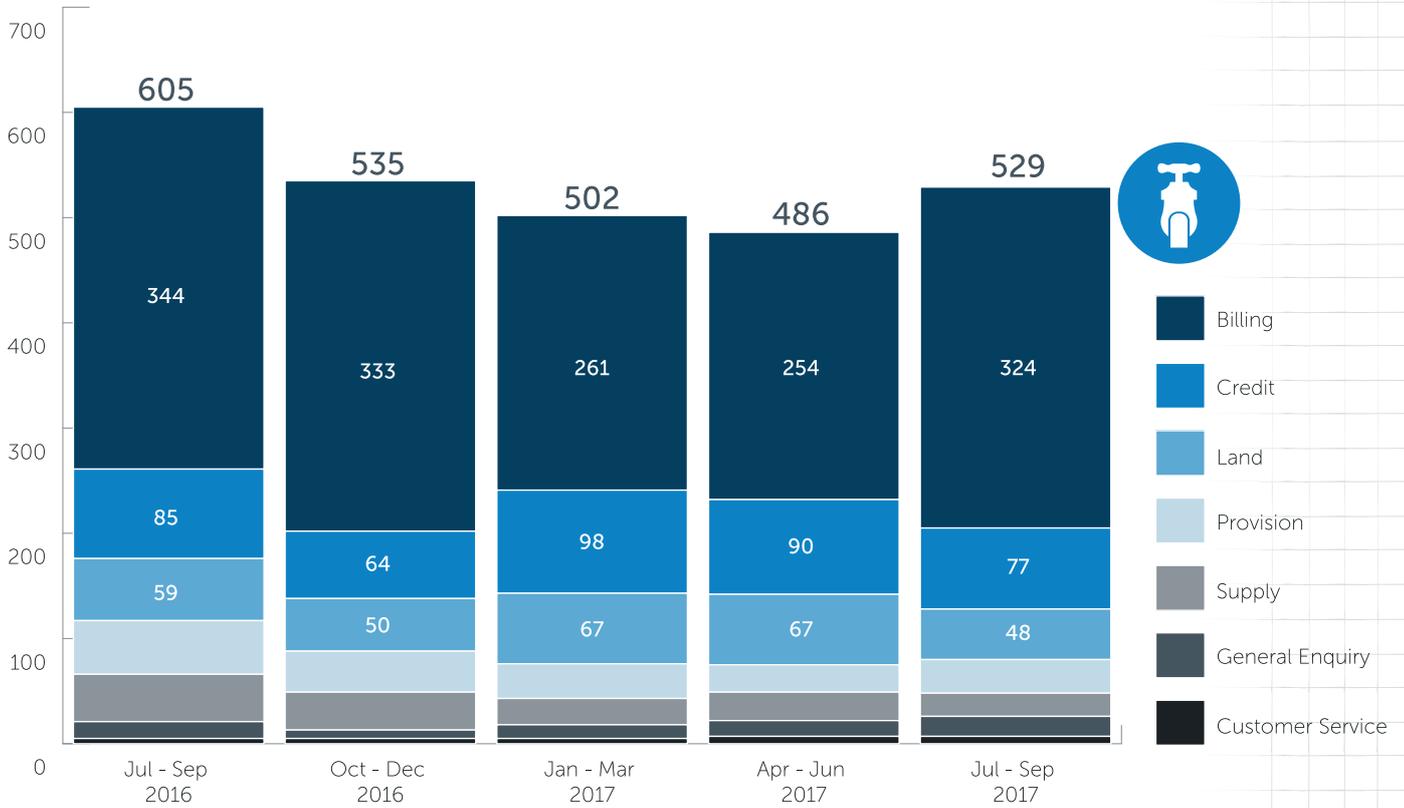
**39%**

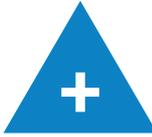

**COMPARED TO THIS TIME LAST YEAR**  
**GAS CASES**  

**3%**

# WATER

FIGURE 9  
Water cases




**COMPARED TO LAST QUARTER**  
**WATER CASES**  
 **9%**


**COMPARED TO THIS TIME LAST YEAR**  
**WATER CASES**  
 **13%**

# SYSTEMIC ISSUES

## Summary of systemic issue investigations opened and closed

July to September 2017

|                          | Energy | Water | LPG |
|--------------------------|--------|-------|-----|
| Open/Under Investigation | 5      | 0     | 0   |
| Closed                   | 8      | 0     | 0   |

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

## Systemic issues identified through EWOV's case handling

July to September 2017

### ***Peak gas usage wrongly billed on off-peak rate***

Through our case handling we identified that some customers had received letters from their gas retailer advising them that their peak gas usage had been wrongly billed on the lower off-peak tariff. Affected customers received backbills. EWOV received 8 cases. We understand some 11,873 customers were affected. The gas retailer advised us that these customers had been sent a letter telling them about the error. The undercharge was backbilled, but limited to nine months in line with the *Energy Retail Code*.

SI/2017/19

### ***Credit default applied for less than the amount owed***

In one complaint received by EWOV, the energy retailer had applied a credit default against a customer for less than the amount owed. This meant that when the default amount was paid, the customer would still have arrears. We checked with the Office of the Australian Information Commissioner (OAIC). The OAIC advised that it didn't have a concern about a customer's whole debt not being default-listed, as long as any residual amount was treated with new notices and then listed according to legislative and minimum code standards. The energy retailer advised that in this case the residual debt had subsequently been paid in full by the customer. SI/2015/44

### ***Non-compliant timeframes***

In two complaints received by EWOV, the reminder notices issued by the energy retailer didn't provide the six business days timeframe required under clauses 108 and 109 of the *Energy Retail Code*. The energy retailer advised us that it was working with the Essential Services Commission on provision of appropriate remediation to affected customers. SI/2016/53

### ***Disconnection after bills don't have pay-by dates***

In three cases received by EWOV, the customer had their supply disconnected after their energy retailer issued payment plan billing without pay-by dates. Pay-by dates are required by clauses 25(1)(e), 109 and 111(1)(b) of the *Energy Retail Code*. The energy retailer advised us that it was working with the Essential Services Commission on provision of appropriate remediation to affected customers. SI/2016/54

### ***Non-compliant notices***

Three cases received by EWOV highlighted an issue with the notice of intent to disconnect for deemed contract customers. The notice didn't comply with clause 115(2)(b) of the *Energy Retail Code*, because the welcome packs of the energy retailer didn't contain an expiry period after which supply would be disconnected. The *Energy Retail Code* states a minimum period of five business days. The energy retailer advised us that it was working with the Essential Services Commission on provision of appropriate remediation to affected customers. SI/2016/55

### ***EWOV's contact details missing on disconnection warning notices***

11 cases received by EWOV highlighted that an energy retailer had sent out disconnection warning notices that were missing EWOV's contact details. EWOV's details are required under clause 110(2)(f) of the *Energy Retail Code*. The energy retailer advised us that it was working with the Essential Services Commission on provision of appropriate remediation to affected customers. SI/2016/60

### ***Short disconnection notice period***

Through EWOV's assessment of whether a supply disconnection was wrongful, we identified that an energy retailer's disconnection warning notice didn't take a public holiday into account. We were informed that some 328 customers were affected. We were advised that the Essential Services Commission was working with the energy retailer on a remediation plan. SI/2016/10

### ***Low gas pressure during supply upgrade works***

21 customers complained to EWOV about low gas pressure as a result of upgrade works in particular areas of Melbourne. We were informed that some 8,500 customers may have been affected. The gas distributor concerned advised us that it had subsequently installed three regulators to reduce the impact on customers. It said about 40% of the upgrade works in the affected areas had been completed, with the remainder scheduled for completion by August 2018. EWOV is continuing to monitor case trends in relation to this issue. The regulator has been notified. SI/2017/20

# PUBLIC SUBMISSIONS MADE BY EWOV

## **Access to Dispute Resolution Services for Exempt Customers**

### ***Australian Energy Regulator (AER)***

EWOV's submission to this AER issues paper addressed the five questions posed in the paper. In doing this, we expressed EWOV's long-established view that all Victorian energy customers, including those supplied by exempt sellers, should have access to the same consumer protections, including access to EWOV. We also provided a series of case studies to illustrate the range of complaint issues customers of exempt sellers have raised with us, and how (in the absence of jurisdiction) we've assisted these customers with information and referral.

[EWOV's submission online](#)

[About this AER consultation](#)

## **National Energy Retail Amendment (Strengthening protections for customers requiring life support equipment) Rule 2017**

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

In responding to this AEMC consultation paper, we noted that life support machine issues aren't a significant source of complaints to EWOV. We provided an overview of the concerns raised in the cases EWOV has received, supplementing this with a case study.

[EWOV's submission online](#)

[About this AEMC consultation](#)

## **Review of the Victorian Electricity Licence Exemptions Framework – Final Position Paper**

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

EWOV's submission provided comments on the implementation approach set out in the Final Position Paper and draft General Exemption Order (GEO). We made further comments on how well the draft GEO achieves the Department's objectives, including some suggestions for amendments.

[EWOV's submission online](#)

[About this DELP consultation](#)

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

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

EWOV's response to this draft report supported the AEMC's proposal for significant reform to address the deficiencies in the existing regulatory framework for embedded networks. In particular, we welcomed the AEMC's endorsement of Ombudsman access as a core customer protection.

[EWOV's submission online](#)

[About this AEMC consultation](#)

# GLOSSARY

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