



Energy & Water  
Ombudsman NSW

# EWON Insights

## Complaints Analysis

Members Quarterly Report

1 January 2019 - 31 March 2019



Energy & Water  
Ombudsman NSW

Freecall 1800 246 545  
Web ewon.com.au  
Email omb@ewon.com.au

Post  
Fax  
ABN

PO Box A2436 Sydney South, NSW 1235  
1800 821 291  
21 079 718 915

# Contents

Introduction	3
Complaint activity January - March 2019	4
Overview	5
<i>Figure 1 - Complaint activity</i>	5
Complaints received	6
<i>Figure 2 - Complaints received January - March 2019</i>	6
Top 10 issues	7
<i>Figure 3 - Top 10 issues January - March 2019</i>	7
Energy issues	8
<i>Figure 4 - Electricity and gas complaints by case category January - March 2019</i>	8
Customer service issues	9
Failure of process	9
Information failure	10
Failure to follow up	11
No response to EWON process	12
Just poor customer service	13
Digital meter issues	14
Outstanding meter installation requests from before 1 February 2019	14
Current meter installation requests not met within the required timeframe	15
Consumer access to data	16
Online portals	17
Water complaints	18
<i>Figure 5 - Water complaints</i>	18
<i>Figure 6 - Top 5 issues January - March 2019</i>	18
Water case study	19
Embedded networks	20
<i>Figure 7 - Cases opened and closed</i>	20
<i>Figure 8 - Embedded network type complaint</i>	20
Residential parks	21
Electricity embedded networks	22
Gas embedded networks	23
Stakeholder engagement	25
Members	25
Government and other stakeholders	26



# Introduction



**6,597**  
COMPLAINTS RECEIVED  
down from 6,861 last quarter

↓ **4%**

decrease in complaints compared with last quarter

↑ **17%**

increase in complaints compared with the same period in 2017/2018

## Complaint environment

This quarter we received 6,597 complaints; with the top three drivers being high bills, poor customer service including failure of providers to respond to customers, followed by complaints about opening or closing accounts. Estimated bills, meters not being accessed / read was not far behind.

## Themes of this report

- Poor customer service, including not handling complaints well and providing incomplete or incorrect information to customers.
- The impact, or rather lack of impact, of the new mandatory installation timeframes on digital meter complaints.
- Issues arising from lack of provision of metering information from meter data providers.
- Emerging issues with energy retailers' online portal information.

## Poor customer service

When combining four key elements – poor service, failure to respond, incorrect advice/information provision and failure to consult/inform, poor customer service is the key factor which results in consumers contacting EWON in relation to customer service. While it is an explicit customer complaint driver in around 50% of complaints, in my view it is also probably an implicit factor for the other 50%. Afterall, if a customer experienced good customer service when raising a complaint with their provider, they'd have no reason to contact EWON.

The most concerning factor is that even when given a further chance to resolve issues through EWON's Refer to Higher Level (RHL) process, providers often fail to do so. Between January and March 2019, 30% of customers referred to their provider at a higher level returned to EWON dissatisfied with the results. There are likely others who experienced complaint fatigue and didn't even return to us.

Frontline staff are now working in a very complex environment; gaining customer trust has probably never been more difficult. And, even the best processes and systems fail from time to time. Recognising this, it is vital that internal escalation processes are offered freely and customers who contact their provider times should be identified through automated system monitoring tools. Equally important, frontline staff need to be empowered to take appropriate time to manage customer expectations. These initiatives should prevent some escalations to EWON.

But when that does not happen and a customer contacts EWON, using the RHL process to re-engage with customers effectively should be a high priority.

## Digital meter delays

In response to increasing digital meter complaints, the Australian Energy Market Commission introduced mandatory installation timeframes on 1 February 2019. Despite the new rules being in place for most of the quarter, complaints about delayed installations only decreased marginally.

In response to our Rapid Response Team investigations, the challenge is not in getting meters installed once we are involved. Most often that happens quite quickly. The challenge is in having the customer service impacts addressed by retailers; ie costs incurred by customers as a result of delayed installations are not readily considered even when substantiation of out of pocket expenses is provided. This needs to be systemically addressed.

## Two new emerging issues

Some retailer staff are now telling us, during investigations, that their metering data providers are not providing accurate or usable meter data. This is not an issue that should arise during complaint investigations – it is a vendor management issue which needs to be addressed. We are now considering this from a systemic issue perspective.

The other new issue related to online portal information where for some customers, there is a mismatch in information sourced via the portal and what appears on their bills. In some cases, this relates to incorrect information provision about what the portal will provide. Again, issues which need to be systemically addressed.

## New Hardship Guideline

The Guideline provides the framework for pre-emptive, holistic and consistent response to affordability issues. We look forward to seeing retailers' revised affordability policies due to the AER by 1 July 2019 and, over time an increase in consumers offered easy, equitable access to affordability programs.

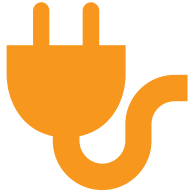
**Janine Young | Ombudsman**  
Energy and Water  
Ombudsman NSW





# Complaint activity

January - March 2019



↓ 6%

decrease in electricity complaints compared with last quarter



↑ 7%

increase in gas complaints compared with last quarter



↑ 9%

increase in water complaints compared with last quarter

## ELECTRICITY

The 4,879 electricity retail complaints represent an increase of 14.9% when compared with Q1 2018, when there were 4,247 complaints. This was a 6.7% decrease from last quarter's 5,230 complaints. The 257 network cases opened represents a slight increase when compared with 203 in the same quarter last year and 248 in the previous quarter. Overall electricity complaints increased by 15.8%, 5,260 this quarter compared to 4,544 in the corresponding 2018 quarter. There was a 6.0% decrease in electricity complaints compared to the previous quarter.

## GAS

The number of gas retail complaints received this quarter (1,052) increased by 18.2% in comparison to the corresponding period in 2018 (890). They also increased when compared with October-December 2018 (986). The numbers of gas network complaints (47) rose by 9.3% in comparison to the equivalent period last year (43) and increased by three complaints since the last quarter. Overall, gas complaints (1,108) increased by 18.2%, compared to January-March 2018 (937) and were 6.5% higher compared to 1,040 complaints last quarter.

## WATER

The number of water complaints received this quarter (223) increased by 34.3% compared to the same period in 2018 (166) and were 9.3% higher than last quarter (204). High bills remained the largest driver of water complaints.

## EXEMPT ENTITIES

EWON received 37 complaints from customers of exempt entities this quarter, the same number as last quarter, but up from 22 in the same quarter in 2018. Most of these were electricity related (35).



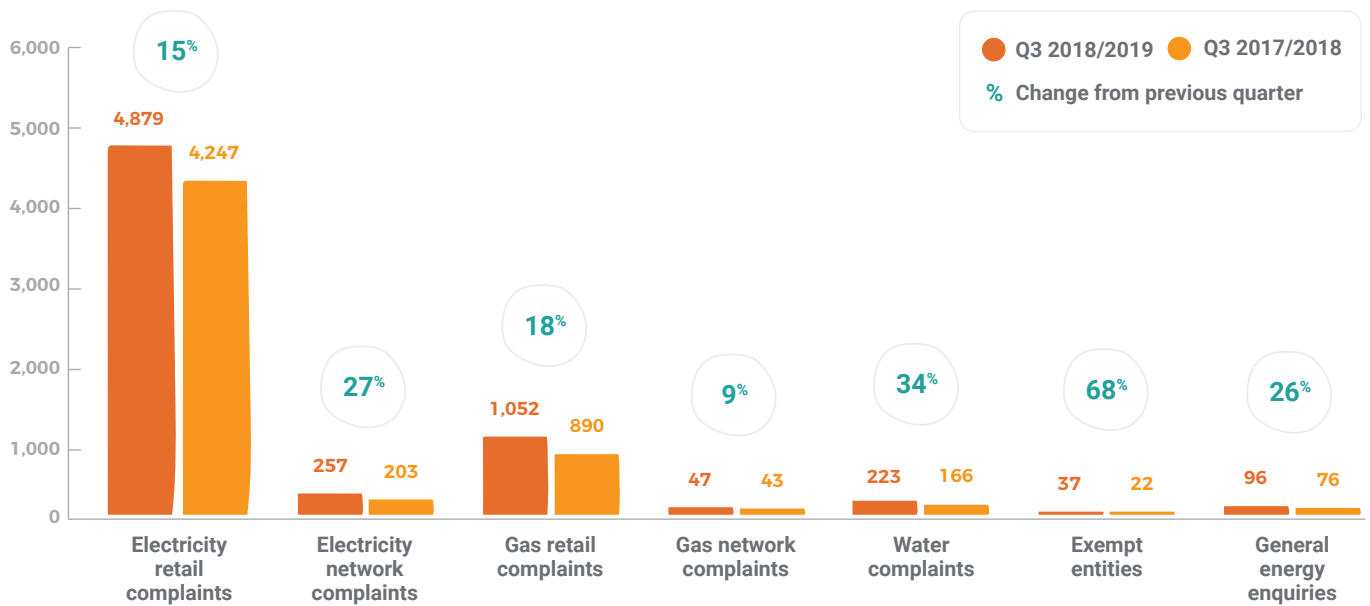
# Complaint activity

## Complaints received

### Complaint activity overview

Complaints received by EWON this quarter increased 16.7% in comparison to the same period in 2018 (6,597 compared to 5,653). When compared with last quarter, complaints decreased by 3.8% (6,597 compared to 6,861), owing to 334 fewer complaints about electricity. The first quarter of the year traditionally has a lower level of complaints compared to the previous quarter. This quarter saw 68 more gas complaints and 19 more water complaints than the previous quarter.

Figure #1: Complaint activity

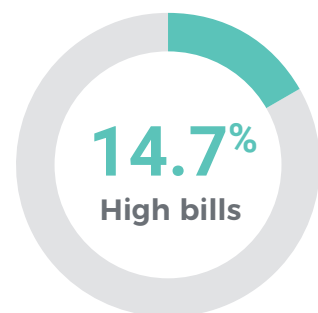


### Customer complaint issues

High bill complaints numbered 1,875, down from 2,343 last quarter. They continue to be the largest issue, representing 14.7% of all issues raised this quarter. This was up from the same quarter last year where this issue drew 1,782 complaints and represented 13.9% of all issues.

Complaints about customer service continued to remain high, with four different aspects of customer service in the top ten issues customers complained about. Complaints about poor customer service represented 11.7% of all issues complained about. This proportion declined by 1% compared to last quarter, after increasing in each of four previous quarters.

Despite the introduction of new rules specifying the strict installation timeframes, complaints about delays installing digital meters were again in the top ten issues raised by customers. Complaints about this issue only decreased by nine from the previous quarter (390 from 399). Payment difficulties (470) increased this quarter by 16.3% compared with the previous quarter, and by 4.7% on the same quarter the previous year. Complaints about credit rating activities remained in the top ten issues this quarter, but continued to decline with only 247 complaints, the lowest number for five quarters.



This issue accounted for 1,875 complaints, down from 2,343 last quarter.







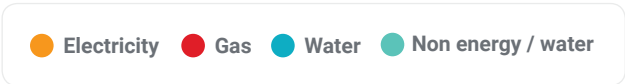
# Complaint activity

## Complaints received

**Figure #2: Complaints received January - March 2019, including previous quarters**

Figure 2 provides more detailed information about the number of complaints received from January to March 2019, in comparison to the four quarters in 2018.

Provider type	Jan-Mar 2019	Oct-Dec 2018	Jul-Sep 2018	Apr-Jun 2018	Jan-Mar 2018
 Retailer	4,879	5,230	5,449	5,050	4,247
Network	257	248	232	253	203
Exempt retailer	35	34	47	21	20
Not allocated	89	82	92	107	74
<b>Total</b>	<b>5,260</b>	<b>5,594</b>	<b>5,820</b>	<b>5,431</b>	<b>4,544</b>
 Retailer	1,052	986	1,075	1,047	890
Network	47	44	79	68	43
Exempt retailer	2	3	5	1	2
Not allocated	7	7	9	11	2
<b>Total</b>	<b>1,108</b>	<b>1,040</b>	<b>1,168</b>	<b>1,127</b>	<b>937</b>
 Retailer	124	131	146	165	98
Network	84	54	6	53	61
Exempt retailer	0	0	0	0	0
Not allocated	15	19	14	18	7
<b>Total</b>	<b>223</b>	<b>204</b>	<b>224</b>	<b>236</b>	<b>166</b>
 Non-energy/Non-water	6	23	13	22	6
<b>Grand total</b>	<b>6,597</b>	<b>6,861</b>	<b>7,225</b>	<b>6,816</b>	<b>5,653</b>





# Top 10 issues

January - March 2019

**Figure #3:** Top 10 issues for this quarter and previous quarters

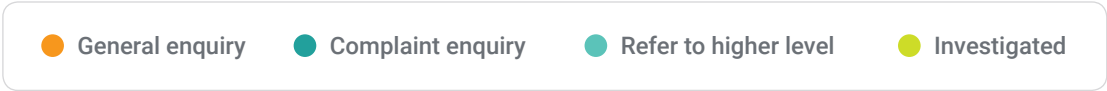
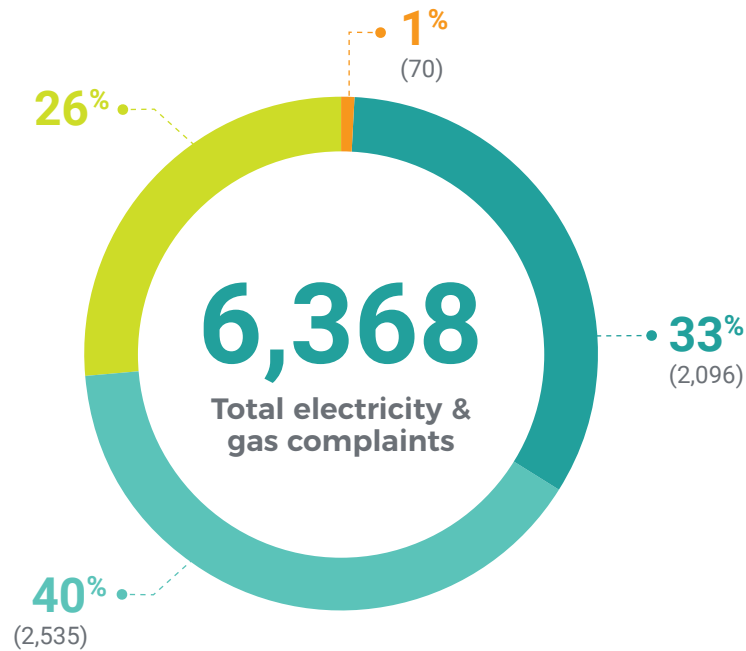
Primary & secondary issue	Jan-Mar 2019	Oct-Dec 2018	Jul-Sep 2018	Apr-Jun 2018	Jan-Mar 2018
<b>1</b> High, disputed	1,875	2,343	2,274	1,958	1,782
<b>2</b> Poor service	1,494	1,770	1,857	1,595	1,367
<b>3</b> Failure to respond	800	975	1,018	1,122	1,097
<b>4</b> Opening/closing account	574	589	680	662	560
<b>5</b> Estimation, meter access/not read	555	558	561	554	564
<b>6</b> Payment difficulties, current/arrears	470	404	599	580	449
<b>7</b> Incorrect advice/information	433	480	518	480	624
<b>8</b> Delay	390	399	329	364	190
<b>9</b> Failure to consult/inform	289	392	520	431	479
<b>10</b> Collection, credit rating	247	266	328	300	276
<b>Total number of issues per quarter</b>	<b>12,727</b>	<b>13,932</b>	<b>15,551</b>	<b>14,630</b>	<b>12,847</b>

● Billing    
 ● Customer service    
 ● Credit    
 ● Digital meter exchange



# Energy

Figure #4: Electricity and gas complaints by case category







# Energy issues

## Customer service issues

This quarter, 1,495 customers identified with customer service issues, up from 1,367 in the same quarter last year.

Poor customer service can arise where a retailer's processes fail and despite the customer's complaint, the retailer does not address the issue. It can also arise when incorrect information is provided to the customer or where the retailer fails to follow up on an agreed action.

Some customers only approach EWON after multiple attempts to resolve an issue. Poor customer service can be compounded when EWON gives the provider the opportunity to resolve the issue through the 'refer to higher level' process, and either the retailer does not contact the customer, or an agreed resolution is not implemented.

### Failure of process

The following case studies highlight instances where system failure is not addressed adequately by retailers when customers contact them, resulting in poor customer service on top of the original process problem.

#### CASE STUDY

##### CUSTOMER SERVICE ISSUES

### Continued disconnection warnings despite disputed bill

A customer disputed an estimated bill of \$818 and, despite his retailer saying it would review the bill, he continued to receive text messages warning of disconnection. Each time he contacted the retailer it assured him that the account was placed on hold, however, the customers would then receive another warning. He contacted EWON to complain about the estimated bill and the poor customer service.

EWON's investigation established that there was

metering data from the distributor showing lower consumption than the original estimate. The investigation also showed that the retailer had not initiated the rebill process or formally placed the account on hold.

The account was rebilled, the pay on time discount was applied and a customer service gesture of \$87 was made, leaving the customer with arrears of \$350.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Customer service issues

### Information failure

Another aspect of poor customer service is either incomplete or incorrect information being provided to the customer.



#### CASE STUDY

##### CUSTOMER SERVICE ISSUES

### Retailer unable to adequately explain complex demand tariff to community centre

A community centre entered into an energy contract which had demand charges in the tariff. It used the retailer's price factsheet to estimate future bills, but then received a significantly higher bill than expected. The community centre attempted to clarify this with its retailer, but was given unclear and conflicting advice on how a demand tariff was calculated. The customer came to EWON and was referred to the retailer at a higher level. The customer returned unsatisfied with the retailer's explanation and its offer to resolve the complaint.

EWON investigated the customer's billing and its contract, as well as the retailer's price sheet and the distributor's demand tariff. The investigation found that the billing was accurate but that there was potential for confusion concerning the description of the tariff on the price sheet. The customer understood EWON's explanation of a demand tariff and accepted that the billing was correct.

The retailer agreed to pay the customer \$500 as a customer service gesture.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Customer service issues

### Failure to follow up

Where a customer provides information to a retailer, good customer service requires a response.



#### CASE STUDY

##### CUSTOMER SERVICE ISSUES

### Faulty meter data not reviewed

A retailer advised a customer that her meter was faulty and was to be replaced. The retailer said that once the new meter was in place, it would check her consumption and review over 12 months of estimated bills. After the meter replacement the customer waited for the billing review and eventually came to EWON seeking the review. This complaint was referred to the retailer at a higher level. She then returned to EWON as the retailer had reviewed the billing from the new meter, but had not

reviewed the previous estimated bills.

EWON investigated the complaint and confirmed that there had been a review of the data from the new meter. EWON then asked the retailer to review the billing from the old meter as requested by the customer.

The retailer conducted the review and as a result adjusted the billing, providing a \$1,963 credit to the customer's account.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Customer service issues

### No response to EWON process

EWON has a refer to higher level process to facilitate the resolution of complaints. Where a retailer does not respond to this process EWON will, with the customers agreement, attempt to facilitate contact. When the retailer fails to engage with a customer through this dual process, both the retailer and EWON are left with a customer feeling that the level of

customer service received was not satisfactory. EWON has been working diligently with members to make the refer to higher level process as effective as possible, including raising the initial customer contact period from three to five days. It is extremely disappointing that EWON receives refer to higher level complaints that have failed due to lack of contact.



### CASE STUDY

#### CUSTOMER SERVICE ISSUES

#### Incorrect billing

After identifying that he was being charged shoulder rates on weekends when he should be charged off peak rates, a customer switched to time of use billing. He spoke to his retailer, but it would not agree there was a problem. The customer then requested his raw data (which was a spreadsheet with 5,000 lines of half hourly information). He did the calculations and the retailer refunded the overcharged amount and provided a small customer gesture. His next bill had the same error and he again requested the data, did the calculations and asked for a similar refund. This time, the customer did not hear back from the retailer so he approached EWON.

This matter was referred to the retailer at a higher level. The retailer did not contact the customer so EWON organised a facilitated contact. The customer again returned to EWON as the retailer again failed to contact him.

When EWON investigated the complaint, the retailer acknowledged that the customer had been correct from the start of the complaint and that he was being inappropriately billed. The current bill was recalculated, and a \$713 credit was applied to the account. The retailer also provided a \$250 credit in recognition of the poor customer service.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Customer service issues

### Just poor customer service

Some issues brought to EWON by customers are simple and should be easily resolved. These matters should not require the customer to continually engage with a retailer and definitely should not require the customer to approach EWON for resolution.



#### CASE STUDY

##### CUSTOMER SERVICE ISSUES

### Account opened for wrong meter resulting in disconnection

A customer was disconnected by a retailer that she did not have an account with. She had had an account with her preferred retailer since July 2017 and had previously been disconnected by a different retailer. Her preferred retailer told her that her account had been opened for the wrong meter and assured her that it had all been fixed.

When the customer recently received another disconnection warning notice she called her retailer and was told not to worry. She had no electricity and, despite promises from both retailers, she had not been reconnected. She had agreed to pay the other retailer nine months arrears in order to get reconnected.

EWON immediately confirmed that the reconnection would occur that day. The customer's preferred retailer acknowledged the customer service issues and provided a \$1,000 payment and also reversed all previous billing leaving her account with a credit of \$2,360. The customer accepted this resolution however she pointed out that she wasn't angry over the initial mistake. Rather, she was frustrated by the ongoing poor customer service and the numerous calls she had made to resolve the issue over a long period. She felt that the retailer did not log calls and treated the customer very poorly even though she had identified a problem that it should have been aware of. She believed her experience showed a poor corporate culture and a lack of training.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Digital meter issues

The high level of customer complaints about digital meter installation delays was a feature of 2018. It resulted in a rule change and an inquiry by the NSW Independent Pricing and Regulatory Authority (IPART) at the request of the NSW Government. However, the introduction of mandatory time frames from 1 February 2019 has not resulted in a decline in complaints from customers about this issue.

Many customers have been waiting for very long periods of time and as of 1 February 2019 any outstanding requests should have been completed by 22 February. The most serious delays are for new connections, which can have very significant financial implications for customers.

### Outstanding meter installation requests from before 1 February 2019



#### CASE STUDY

##### DIGITAL METER ISSUES

### Non-compliant delay in meter installation

A customer had been waiting to have a new meter installed since the end of the Solar Bonus Scheme in December 2016. He was sent a letter advising of the end of the Scheme and received assurance that he needn't do anything as the retailer would have the new meter installed.

Due to personal circumstances, the customer overlooked the fact that the meter had not been installed and began contacting the retailer in early 2018 about the issue. The retailer advised the meter had not been installed because it was unable to locate his old meter and said that the customer needed to provide its GPS location and other details. The customer provided the requested information

but four months later was told the service order had mistakenly not been lodged. The customer was then advised of three different meter installation dates, with the latest being 11 February 2019. The customer contacted EWON for assistance on 27 February when the meter still hadn't been installed.

In EWON's investigation the retailer acknowledged the delay was not compliant with the new installation timeframe rules. A new meter installation appointment was lodged for 11 April 2019. The retailer invited the customer to contact it and discuss a suitable credit for the missed solar generation. EWON invited the customer to return if the meter installation did not occur.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Digital meter issues

### Current meter installation requests not met within the required timeframe



#### CASE STUDY

##### DIGITAL METER ISSUES

### Possible non-compliant delay in meter installation

On 25 February 2019, a customer installed solar panels and requested a digital meter to be installed. The customer was advised by her retailer that it would be installed within 15 business days. When this did not occur, she rang the retailer but it said it had no control over the delay and that the installation would now occur within two to six weeks.

In an EWON investigation, the retailer confirmed the delay was non-compliant. An installation date was set for 29 March 2019. The retailer invited the customer to contact it and discuss a suitable customer service credit for the delay and missed solar generation. The customer was invited to return to EWON if the meter installation did not occur.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Digital meter issues

### Consumer access to data

The Federal Government is progressing Consumer Data Rights in a range of industries, including the energy sector. Currently there are some rights to data built into the Rules, but they are inadequate in the face of the rapid technological change taking place. The widespread introduction of digital technologies including solar monitoring, metering and online portals, provide potentially significant benefits for consumers, but the marketing of new technologies can sometimes promise more than can be delivered, leading to consumer

expectations which outstrip technological capacity.

EWON is receiving more complaints related to consumer data. Complaints about online portals are a good example. Currently there is no regulation of the technology, yet customers are experiencing issues which generate complaints. As these online services are considered 'add-ons', there are no uniform obligations on retailers regarding accuracy, access or accountability.



### CASE STUDY

#### DIGITAL METER ISSUES

### Privacy risk as retailer's meter data provider gives meter data for the wrong customer

A customer received an electricity bill that she disputed as high, given the size of her solar generation system. She contacted the retailer and an amended bill was sent with a minor adjustment, but there was no explanation and the retailer did not respond to her requests for a review. EWON referred the complaint to the retailer at a higher level for resolution. The customer returned to EWON as she was not satisfied with the outcome .

EWON investigated the customer's complaint and concluded that the billing was appropriate. However, the meter data that the retailer's meter data provider supplied to EWON mistakenly included meter data for another person's property, a serious privacy breach.

EWON will treat this matter as a systemic issue and raise it with the retailer directly.

[VIEW MORE CASE STUDIES](#)





# Energy issues

## Digital meter issues

### Online portals



#### CASE STUDY

##### DIGITAL METER ISSUES

### Customer's expectation of data provision exceeds technical capacity

A customer contacted EWON as he was experiencing issues accessing his electricity consumption and generation data online. When the customer logged onto the retailer's online portal, he could see information for his gas account, but not his electricity account, which he had been told he would be able to see live data for. The customer was also experiencing issues with the retailer's mobile phone application for monitoring solar generation. EWON referred the complaint to the customer's retailer at a higher level for resolution but the customer returned to EWON as he could not resolve the complaint.

The customer's concerns about the online portal could not be fully resolved. The retailer advised it had implemented a fix so that the missing electricity account could be seen. However, the retailer advised it was unable to provide real time consumption data. The retailer offered the customer a \$500 customer

service credit in recognition of the customer service issues. The customer declined the offer and asked EWON to investigate the billing, as well as his claim that he would be able to access real time consumption data online and solar generation data on the mobile phone application.

EWON completed its investigation and concluded the billing was appropriate. EWON also found that the retailer had clearly informed the customer that his online consumption data would not be live, even with a digital meter. The retailer had also told the customer that live solar generation required purchase of an additional device which would be at a cost and the mobile application would not function without this. It offered a customer service gesture of \$250 towards this. The customer was not satisfied with the outcome of EWON's review. The case was finalised on a no further investigation basis.

[VIEW MORE CASE STUDIES](#)

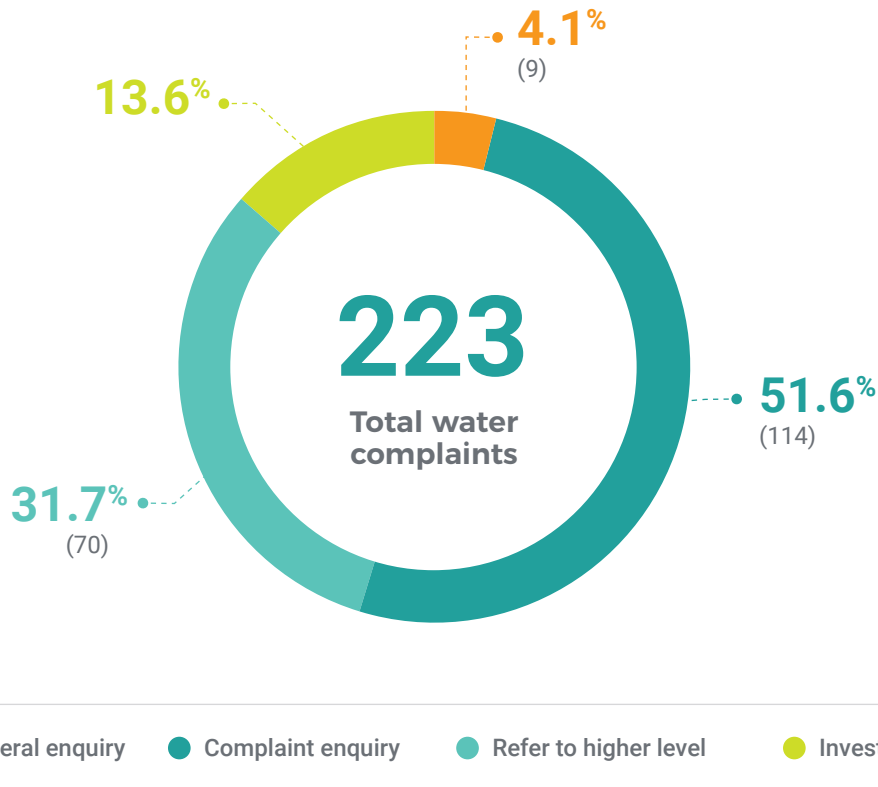


# Water

The number of water complaints received this quarter (223) increased by 31.2% compared to the corresponding period in 2018 (170) and increased by 9.3% compared to last quarter (204).

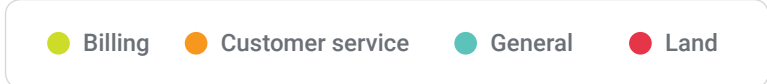
High bills continue to be the most complained about issue for water customers contacting EWON. Other complaints to EWON about water providers relate to customer service issues and property damage, as seen in Figure 6 below.

**Figure #5: Water complaints**



**Figure #6: Top 5 water issues**

Primary & secondary issue	Jan-Mar 2019	Oct-Dec 2018	Jul-Sep 2018	Apr-Jun 2018	Jan-Mar 2018
<b>1</b> High, disputed	40	40	45	57	51
<b>2</b> Poor service	35	31	43	49	38
<b>3</b> Failure to respond	29	29	29	28	25
<b>4</b> General energy/water	26	29	26	38	14
<b>5</b> Property damage/restoration	19	18	16	15	9
<b>Total number of issues per quarter</b>	<b>149</b>	<b>147</b>	<b>159</b>	<b>187</b>	<b>137</b>





# Water issues



## CASE STUDY

### Changed personal circumstances warrant special assistance

The customer, who is a concession card holder, received a restriction notice from her water provider for an overdue amount of \$774.60. She contacted EWON for assistance to deal with the restriction notice because she was not the account holder for the property. The customer's ex-partner was the account holder and the customer was living at the property while negotiating their divorce. The customer was in court proceedings with her ex-partner and was unaware that he had not been paying the water account. The water provider previously told the customer she could make payments of \$25 per fortnight to the account, but she should not set up a formal payment plan as she was not the account holder.

EWON contacted the water provider which confirmed the debt on the account but advised that it could not accept a payment arrangement as the customer was not the account holder. EWON asked the water provider if the customer could be treated as a tenant and for it to assess her for further financial assistance, which the water provider agreed to. The provider arranged a Payment Assistance Scheme (PAS) credit, removed the late payment fees applied to the account (totalling \$151.40) and accepted the customer's request for a payment arrangement of \$25 per fortnight.



## CASE STUDY

### Lengthy delay opening a water account

A customer purchased a property in a planned community. She received a recycled water bill and a seven-day disconnection warning for \$1,120 addressed to her home, but in the name of the company developing the planned community. The public water provider refused to speak to the customer about the bill or disconnection warning notice because the account was not in her name. The customer advised EWON that she already had a water account in her own name for the property. The customer made enquiries with the developer, who told her to pay the bill. The customer also provided a photograph of her water meter.

EWON contacted the public water provider. It advised

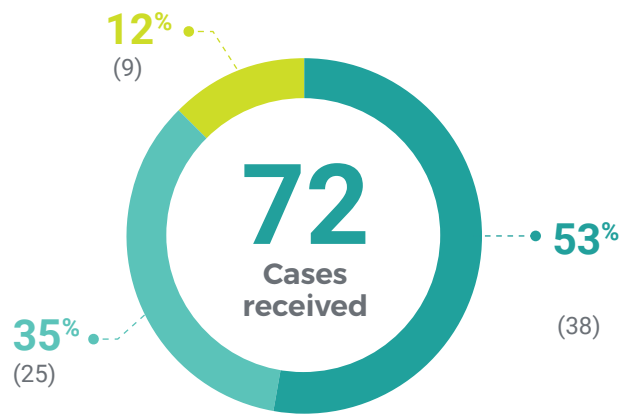
EWON that its billing system showed the address as a vacant lot. EWON also contacted the recycled water provider, a Water Industry Competition Act (WICA) licensee, for the planned community. The recycled water provider noted that the developer of the community arranged the billing of recycled water to residents and that potable water was provided by the public water provider. The public water provider investigated further and advised EWON that the customer's account was set up based on an address for another lot in the planned community. The public water provider corrected the error, offered to write off the debt, and commenced billing the account based on the customer's photograph of the meter reading.

[VIEW MORE CASE STUDIES](#)



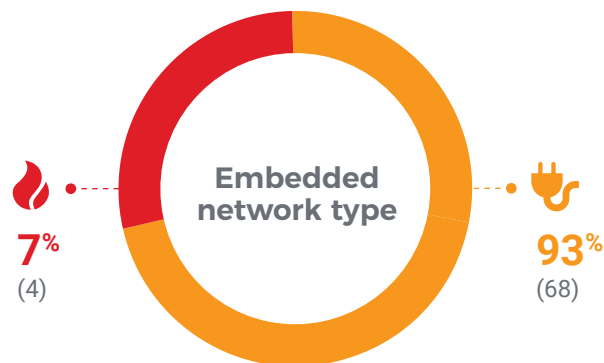
# Embedded networks

Figure #7: Cases opened and closed



● Authorised retailer (EWON member) ● Exempt seller (non member) ● Residential park operator (non member)

Figure #8: Embedded network type complaint



● Electricity ● Gas



# Embedded networks

## Residential parks

Access to roof top solar PV systems continues to be a complex issue which causes complaints from customers in residential parks. One of the issues is a lack of information available to residents about solar technology prior to purchasing a system from a solar installer. It also appears that in many instances park operators lack the required knowledge to help residents make an informed decision about these services.

The calculation of electricity prices and service availability charges also remains a critical issue. The NSW Supreme

Court recently determined (in the case of *Silva Portfolios Pty Ltd trading as Ballina Waterfront Village and Tourist Park v Reckless [2018] NSWSC 1343*) that operators are not entitled to charge a home owner more for electricity than the operator has been charged for the electricity consumed by the home owner. This *Reckless* method of calculating the amount charged to the home owner for electricity includes service availability charges in the overall amount charged to the resident. This means that if an operator uses the *Reckless* method, they should not also charge a separate service availability charge.



### CASE STUDY

#### EMBEDDED NETWORKS

### Park resident living in an embedded network has no access to solar feed-in tariffs

A customer moved into a residential park and enquired about installing solar panels on his new home. He was told that he could find his own energy provider and obtained permission from the residential park operator to install the solar panels. The customer then contracted an installer to carry out the work. The customer only found out that the residential park was an embedded network after the installation of the solar panels was complete. The customer complained to EWON that he was now waiting for a new meter to be installed by an electrician at his own cost, and that even after the meter is installed, the park operator

said it is uncertain that he will get any credits for the solar energy that is exported to the embedded network.

EWON provided the customer with information about his rights as a customer of an embedded network and the park operator's obligations under the AER's network and retail exemption framework. The customer was satisfied with this and agreed to continue negotiating with the park operator. As the operator was not an EWON member, its details were passed onto EWON's membership team for processing.



### CASE STUDY

#### EMBEDDED NETWORKS

### Billed twice for service availability charges

The customer lived in a residential park established as an embedded network. On 19 January 2019, the residential park operator sent all permanent residents a letter advising that the calculation of their electricity charges would change. The customer explained to EWON that the new rate for each kWh charged to residents would now be based on the charges the operator received for the total kWh used by the whole residential park for each billing period. She also noted that the park operator would continue to charge residents for service availability (SAC) separately.

The customer complained to EWON that the new method for calculating their charges included charges that the park operator has paid for access to the network. Therefore, she considered they are being charged twice for supply charges.

EWON provided advice to the customer on the current rules for charging residential customers. We invited the customer to send in a copy of her most recent bill so her charges could be reviewed. The case was closed pending the customer's return to EWON.



# Embedded networks

## Electricity embedded networks

EWON now receives a similar number of complaints from embedded network customers serviced by both authorised retailers and exempt sellers. The two sets of rules that apply to retail energy contracts and embedded network contracts

can be confusing to customers. In some cases, exempt sellers don't understand the customer's rights and entitlements under the AER's Exempt Selling Guideline.



### CASE STUDY

#### EMBEDDED NETWORKS

### Exempt retailer refuses to refund security deposit as required by the AER Exempt Selling Guidelines

When an embedded network customer moved into her apartment, she was charged a security deposit by the exempt seller. The customer was told that the security deposit was payable because she was a tenant rather than an owner occupier. The customer noted that she had paid her monthly energy bills on time for 12 months and recently asked the exempt seller to refund the security deposit. She complained to EWON that the exempt seller refused to refund the security deposit until the customer's tenancy had ended.

As the embedded network was not a member of EWON, we provided the following information to help the customer resolve the dispute directly with the exempt retailer:

- Under Condition 7 of the AER (Retail) Exempt Selling Guidelines – security deposits charged by exempt retailers must be applied in accordance with the National Energy Retail Rules governing

the application of security deposits under a standard retail contract.

- Rule 45 of the National Energy Retail Rules allow the customer to request a refund of the security deposit when they have completed one year's payments by the pay-by dates on the retailer's bills.

The customer contacted EWON again later to advise that she had received a refund of the security deposit and thanked EWON for the information we provided. The customer noted that most of the residents in the complex were renting through the government's National Rental Affordability Scheme and this information would also help other tenants access their security deposits.

As the operator was not an EWON member, its details were passed onto EWON's membership team for processing.



# Embedded networks

## Gas embedded networks

In our recent submission to the AEMC's draft report 'Updating the regulatory frameworks for embedded networks' we suggested that there was merit in considering the development of a national framework for gas embedded networks. We also noted that a significant proportion of the gas complaints we receive concern the billing of common hot water systems – from both customers connected to the retail gas market and customers within embedded networks.

The gas services provided to embedded network customers usually take the form of an unmetered 'gas cooktop' service with a daily service charge. This 'gas cooktop' service is frequently bundled together with gas powered hot water consumption and service charges. Accordingly, any dispute

that a customer has about their embedded network hot water service has the potential to also impact on the provision of any related energy service they receive.

The AER does not consider the sale of bulk hot water a 'sale of energy' under the Retail Law and Retail Rules. This means that in NSW, the selling of hot water within a strata development is unregulated, apart from the application of the Australian Consumer Law. However, hot water is an 'essential service', where problems of affordability, disconnection, or quality of supply significantly impact on households, particularly for families with young children and other consumers at risk of, or experiencing, vulnerability.



### CASE STUDY

#### EMBEDDED NETWORKS

### Lack of transparency about hot water charges

A customer moved into an apartment with an embedded network for gas and electricity. After receiving his first bill, the customer contacted the retailer to clarify how the hot water charges/rate were calculated. The retailer explained that the customer's hot water charges were based on the amount of hot water he used as recorded by his individual hot water meter. The retailer also noted that the rate applied to each litre of hot water was determined by the cost of the gas used to heat the water. The customer complained to the retailer that there was no transparency for each customer about how much water was used by the whole building or how the price

of gas was converted into litres of hot water.

The retailer advised the customer that it could not provide all the requested information. It did explain that the price of hot water was calculated using an estimated common factor obtained from the local area gas distributor. The customer complained to EWON as he was not satisfied with the retailer's explanation of his charges.

The customer agreed to have his complaint referred to the embedded network retailer at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.



# Embedded networks

## Gas embedded networks



### CASE STUDY

#### EMBEDDED NETWORKS

### Embedded network customer disputes high bill for bundled hot water and cook top gas charges

A customer moved into an apartment building with an embedded network. The customer opened an account with the retailer in July 2018 after receiving an invoice addressed to the 'Unit Occupier'. The bill was for the energy used to heat the hot water and supply charges for unmetered cook top gas. The customer then received a re-issued bill covering the period from the date of connection (March 2018). The customer complained to EWON, via an interpreter, that she felt the re-issued bills were too high. The customer was also concerned that the payment she made of \$368.10 was not noted on the bill.

The customer contacted the retailer which advised her that the billing was based on digital meter data and was correct. The customer was confused about what charges (electricity, hot water, or cook top gas) were contributing to the higher than expected bill. The customer agreed to have her complaint referred to the embedded network retailer at a higher level, knowing she could return to EWON if an agreed outcome could

not be negotiated. The retailer notified EWON that it responded to the customer's complaint by email on 9 October 2018.

The customer contacted EWON again on 19 October 2018 to advise that she had not received a response from the retailer. The retailer advised EWON that the customer's payment of \$368.10 was received on the same day the bill was issued. The retailer also advised EWON that it had engaged the meter data provider to investigate the meter readings following the customer's complaint.

The meter data provider provided a photograph of the customer's meter which confirmed the correct billing of the account. The retailer noted that more information could have been provided to the customer at the first point of contact about how its hot water billing worked. The customer contacted EWON again on 29 January 2019 to advise that the retailer had contacted it and resolved the complaint.





# Stakeholder engagement

## Members

Meetings	Staff involved
Operational Advisory Group – Exempt Entities and WICA providers	Ombudsman / General Manager Governance, Awareness & Policy / Manager Governance / Member Liaison Officer
EnergyAustralia	General Manager Investigations
AGL	Ombudsman
Simply Energy	Ombudsman
Ausgrid	Ombudsman / Manager Policy & Research / Investigations Specialist
Jemena	Ombudsman / General Manager Investigations
Powershop	Ombudsman
Essential Energy	Ombudsman / Manager Policy & Research / General Manager Investigations / Investigations Specialist
Endeavour Energy	Ombudsman / Manager Policy & Research / Investigations Specialist
Alinta Energy	Ombudsman
Origin Energy	Ombudsman / General Manager Investigations
1st Energy	Ombudsman
Mojo Energy Group	Ombudsman
Winconnect	Ombudsman
Sydney Water	Ombudsman
Hunter Water	Ombudsman
Red Energy	Ombudsman



# Stakeholder engagement

## Government and other stakeholders

Meetings	Staff involved
Australian Energy Market Commission	General Manager Governance, Awareness & Policy / Manager Policy & Research / Manager Governance
Australian Energy Regulator	Ombudsman / General Manager Governance, Awareness & Policy / Manager Policy & Research / Manager Governance
AER Customer Consultative Group Meeting, Melbourne	Ombudsman
Department of Premier and Cabinet	General Manager Governance, Awareness & Policy / Manager Policy & Research
Department of Planning and Environment	General Manager Governance, Awareness & Policy / Manager Policy & Research
IPART	General Manager Governance, Awareness & Policy / Manager Policy & Research / Senior Policy Officer
Thriving Communities Partnership - Sydney	Executive Officer
ANZOA Policy and Research Interest Group	Manager Policy & Research
Caravan and Camping Industry Association	Ombudsman / General Manager Governance, Awareness & Policy
Arc Energy	Ombudsman
Fair Trading NSW	General Manager Governance, Awareness & Policy / Manager Policy & Research / Senior Policy Officer
EWOQ	EWON Board Chair / Ombudsman
EWOV	EWON Board Chair / Ombudsman
EWOSA	EWON Board Chair / Ombudsman

# Appendix: Case studies

## Customer service issues

Failure of process	28
Information failure	29
Failure to follow up	30
No response to EWON process	31
Just poor customer service	32

## Digital meter issues

Outstanding meter installation requests from before 1 February 2019	33
Current meter installation requests not met within the required timeframe	34
Consumer access to data	35
Online portals	36

Water	37
-------	----



# Customer service issues

## Failure of process

### Customer leaves affordability program after poor customer service

After a customer's payment plan amount increased from \$21 to \$120 per week, he complained to EWON. The customer also complained that he had been spoken to rudely, told to use Centrepay and to seek financial counselling. The customer objected to this as he was not receiving income support and believed that he was able to manage his bills. His complaint was referred to the retailer at a higher level. The customer returned to EWON after the retailer refused to review his payment plan.

An EWON investigation established that the amount of \$120 was automatically generated after the first three months on the affordability program. It also established that the customer's arrears were only \$12. In discussions, the retailer acknowledged that \$120 was excessive and offered to reduce the weekly payment to \$39 per week.

When this was explained to the customer, he chose to cancel his participation in the affordability program and indicated he would increase his payments to \$27 per week, which was what he considered his usage to be.

---

### Online application form not working

After trying to establish a new gas connection for an apartment building, a customer was advised he had to complete an online application form. Each time he tried to submit the form it failed, so he raised the matter with the retailer. He spoke to the retailer a number of times, but kept being told the application must be completed online. He was dissatisfied with the delays he was experiencing and came to EWON.

The customer agreed to have his complaint referred to the retailer at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.

---

### Customer unsuccessful in closing an account

A customer moved to a new house and used his retailer's online move in/out system. He received correspondence to confirm the successful transfer, however he then received a bill for his previous address that covered a period of time after he moved out. The customer came to EWON when the retailer would not adjust his bill. He told us that when he contacted the retailer it advised him that the online system was unreliable and that he should have phoned.

The customer agreed to have his complaint referred to the retailer at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.

---

### A customer remains disconnected after opening an account

After moving into a new apartment, the customer attempted to open a gas account with his preferred retailer. This failed and he was disconnected by the retailer which held the site. He then opened an account with that retailer to ensure reconnection. Seven days after the disconnection, the customer had not been reconnected despite several calls to the retailer, so he contacted EWON.

EWON investigated and discovered that a number of reconnection requests had been made and then cancelled. The retailer confirmed the most recent request was scheduled for the following day. EWON contacted the distributor and arranged for an immediate reconnection.

The customer was reconnected, and the retailer provided a \$150 payment as a customer service gesture.



# Customer service issues

## Information failure

### Remedial work required but no information provided to customer

After installing solar in July 2018, a customer requested a new meter. When he rang to enquire about a delay, he was told that he needed to have an electrician contact the retailer for information. Each time he and the electrician phoned the retailer for details it said it needed to consult its meter provider. The customer rang EWON in December 2018 to complain about the delay. This matter was referred to the retailer at a higher level. The customer returned to EWON as he still did not have the information needed to correct his switchboard.

EWON opened an investigation and the retailer provided the meter provider's report detailing the work required. EWON forwarded this information to the customer. The customer was informed that once the work was completed, a date could be set for the meter installation. The retailer provided \$500 as a customer service gesture in acknowledgement of the delay providing the necessary information.

---

### Wrong information on tariff type provided to customer

After a customer's meter was replaced, he received a letter informing him that his tariff had been changed to 'time of use'. He contacted his retailer and was told that the tariff was beyond its control. The customer was referred to the distributor which told him that the tariff was at the retailer's discretion. EWON referred this matter back to the retailer at a higher level, but the customer returned to EWON as the retailer said that the distributor had refused to change the tariff.

EWON's investigation established that the distribution time of use tariff had an opt out provision and the retailer agreed to request a tariff change.

The tariff reverted to a flat rate type. The customer was rebilled and the retailer provided a \$150 customer service gesture.

---

### Transfer in error not corrected and customer billed when there was no informed consent

After a customer had established an account with her preferred retailer she began to receive 'dear occupant' bills from another retailer. When she called that retailer, it claimed that her preferred retailer was billing the wrong meter. She complained to EWON and the complaint was referred to the retailer which owned the site for resolution at a higher level.

The customer then returned to EWON because that retailer had said it could only return the account to the original retailer back to September 2018 and that she owed it for the June to September 2018 period. She said the retailer had told her she was lucky it could only backbill to June 2018 and offered to reduce the bill to \$400. She was not happy with this offer because she had never agreed to a transfer and she objected to the retailer's attitude.

An EWON investigation established that the original retailer had billed the customer on the right meter and that there had been a transfer in error by the current retailer. EWON confirmed there had been no informed consent, as the customer had only opened an account with the current retailer to avoid disconnection based upon incorrect information provided. Further, it had not informed the customer of her rights under Rule 57A.

The retailer reversed the charges and the account was closed with a nil balance.

---

### Inadequate information provided to rectify a defect

A customer received a notice from a distributor which gave him 21 days to rectify a defect. It did not provide clear details of what needed to be rectified so he rang seeking clarification. The customer said the distributor did not respond with details and threatened him with disconnection. He came to EWON and said that he understood his responsibility to rectify a defect but needed accurate information to do so.

The customer agreed to have his complaint referred to the distributor at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.



# Customer service issues

## Failure to follow up

### Credit listing not removed

An advocate for a customer sought assistance from EWON to investigate an incorrect credit listing. This matter had a failed referral to a higher level and a failed facilitated contact before being investigated. The investigation resulted in a negotiated resolution where the retailer agreed to request removal of the listing. The advocate returned to EWON because the customer was still credit listed.

A second EWON investigation established that the customer was still credit listed. The retailer identified that, while it had deleted the listing internally, it had not notified the credit reporting body. The retailer agreed to request the removal.

The customer's listing was lifted three months after the retailer agreed to it.

---

### After a disconnection in error the promised compensation was delayed

After being disconnected in error and despite initial promises, a customer's reconnection did not occur for two days. The retailer promised to compensate the customer for spoiled food and hotel accommodation. When this was not forthcoming, the customer came to EWON and the matter was referred to the retailer at a higher level. The customer returned to EWON because, despite the retailer promising to pay \$935 compensation, this had not occurred.

EWON contacted the retailer and it indicated that it needed to confirm the customer's banking details. The customer said that she had already provided the details to the retailer and agreed to confirm with EWON when the money had been paid.

The compensation payment was received a month after the disconnection.

---

### Failure to act on faulty meter

After receiving a large bill in early 2018, a customer disputed the amount with her retailer. The retailer suggested she hire an electrician to test her appliances. The customer did this and the electrician identified a problem with the meter which she then reported to the retailer. The retailer made two dates for a meter test which did not occur.

The customer moved to a new house in September 2018. The retailer then told her that she had to pay for the meter test and also get permission from the new occupants, so she approached EWON. This complaint was referred to the retailer at a higher level. The customer returned to EWON because the retailer had said there was nothing it could do, and that she should return to EWON. The customer had not paid the disputed bill.

The EWON investigation established that the disputed bill was issued with twice the normal consumption. The investigation also identified that the distributor had raised a meter fault notification in March 2018 which the retailer had ignored. The retailer offered to rebill the account and add the pay on time discount as a goodwill gesture.

The retailer reduced the bill by \$700 (including a \$100 customer service gesture) and provided a pay on time discount of \$141, leaving a balance of \$1,068.



# Customer service issues

## No response to EWON process

### High bill complaint

A customer approached EWON seeking assistance to have a high bill reviewed. This matter was referred to the retailer at a higher level. The retailer did not contact the customer so EWON organised a facilitated contact. The customer again returned to EWON as again, the retailer failed to contact him.

EWON began an investigation and the retailer identified that the meter had possibly been under-read for the period prior to the high bill. The retailer offered to apply a credit of \$286 as a resolution of the customers complaint. The customer accepted this offer.

---

### Rebate failure

A customer's income support changed from a disability payment to the age pension. He said that his concession number and details remained the same but his energy rebate had ceased. The customer called the retailer a number of times and it said it would look into it but then he received no response. He complained to EWON about the poor level of customer service.

This matter was referred back to the retailer at a higher level. The retailer did not contact the customer so EWON organised a facilitated contact. The customer returned to EWON again, as the retailer failed to contact him for a third time.

When EWON contacted the retailer, it applied the missing \$245 rebate and also provided a \$49 customer service gesture.

---

### Customer on wrong tariff

After receiving high bills for a number of years, a customer contacted the retailer for an explanation. After a number of contacts, the retailer identified that the residential premises was being billed on a business tariff. It said that it would fix this but then said that the distributor had rejected a request to reclassify the site. The retailer suggested that the customer should contact the distributor directly. The distributor sent the customer back to the retailer. The retailer then said there was nothing it could do. The customer said that when he suggested going to the Ombudsman, the retailer responded with 'go ahead'.

EWON referred this matter to the retailer at a higher level. The retailer initially made contact, but the customer received no further response so EWON organised a facilitated contact. The customer again returned to EWON as the retailer failed to contact him.

EWON opened an investigation, however the retailer immediately made a resolution offer. The customers account was changed to a residential account and the customer was reimbursed a very significant \$45,826.



# Customer service issues

## Just poor customer service

### Customer billed after house burnt down

In January 2019 a customer emailed EWON stating the retailer had 'just issued us a bill for the period of February to May 2018. This is ridiculous. Why am I still being billed. Our house burnt down on 24 November 2017. What do they not understand.'

An EWON investigation established that the retailer had issued a final bill but the distributor had then updated the readings from the removed meter. A further final bill was automatically generated and issued. The retailer acknowledged that this was inappropriate and apologised. The account was closed with a zero balance.

---

### Tree removal dispute

In February 2018 a customer was told by his distributor that it was going to remove three trees at the front of his property at no cost to him. When the trees were cut down the crew didn't have the equipment to remove the stumps, but promised to return. Some time later the stumps were painted in preparation for removal. In October 2018 the customer called the distributor which informed him it had spent the budget for the year. In December the distributor confirmed in an email that it wouldn't be removing the stumps.

The customer agreed to have his complaint referred to the distributor at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.

---

### Disconnection notices sent in error

Disconnection warning notices addressed to 'unknown consumer' were being sent to an embedded network customer by a different retailer. When the customer rang the retailer, it asked for his NMI but he was unable to supply one because it was not on his bill and he lacked access to his meter. He contacted EWON wanting the disconnection notices to stop.

An EWON investigation established that the NMI on the notices was for a Victorian address. The retailer identified that the notices had been sent to the wrong address due to a system issue which would be fixed. It provided an assurance that no further notices would be sent.

EWON will treat this matter as a systemic issue and raise it with the retailer directly.

---

### Ongoing phone calls to wrong customer

A customer was being pursued for debt collection in the name of a person he had never heard of. He told EWON that he had contacted the retailer a number of times seeking to get his number removed from the account but continued to be contacted. He was not prepared to be referred back to the retailer and wanted the calls to stop.

In an EWON investigation the retailer confirmed that its customer had provided the wrong mobile number. It rectified this error and EWON was able to provide written confirmation to the customer that the calls would cease.





# Digital meter issues

## Outstanding meter installation requests from before 1 February 2019

### Non-compliant delay in meter installation

After installing a solar system, a customer contacted her retailer in November 2018 to arrange for a digital meter to be installed. Installation was set for 14 December 2018 but this did not occur. After the customer did not receive an update, she contacted the retailer on 11 February 2019 and was advised the meter would be installed on 19 February 2019 but, again, this did not occur. The customer then contacted EWON.

EWON contacted the retailer which arranged installation on 26 March 2019. The retailer acknowledged the delay was non-compliant and provided the customer a \$100 credit in recognition of the delay. It also offered to work with the customer to estimate the amount of exported electricity she had missed out on and provide a reasonable credit for it.

---

### Possible non-compliant delay in meter installation

In November 2018, a customer was building a new house and made a request to her retailer for an electricity connection. In mid-February 2019, the customer told EWON she was still waiting for a meter to be installed and the delay was impacting her financially. She also said she had been having to use the neighbour's electricity supply. EWON referred the customer's complaint to the retailer at a higher level for resolution.

The customer returned to EWON on 22 March 2019 and said she had not been contacted by the retailer and instead had contacted the retailer herself on 12 March 2019. The retailer told her the meter would be installed in five days, which did not occur.

EWON's investigation found that the retailer had arranged a meter installation on 12 March 2019 when the customer rang, but had cancelled it the next day and had no records of why it had done so. The meter was eventually installed on 25 March 2019 and the retailer invited the customer to contact it and discuss a suitable customer service gesture for the delay.



# Digital meter issues

## Current meter installation requests not met within the required timeframe

### Possible non-compliant delay in meter installation

On 4 February 2019 a customer applied to have a meter installed at a new property. The retailer said a meter would be installed but did not provide a date. The customer followed this up and was told the meter would not be installed until 18 March 2019 as the customer was in a rural area and the meter provider did not have technicians in that area. The customer said he was being impacted financially as he had people who wanted to move into the house and he was paying insurance and rates until they moved in.

EWON investigated the delay and the retailer said the meter would be installed on 11 March 2019 and the customer could contact the retailer to discuss a suitable customer service credit for the delay.

The customer returned to EWON on 14 March 2019 as the meter had not been installed as agreed. EWON investigated the delay again and retailer completed the installation on 18 March 2019. The retailer invited the customer to discuss an appropriate customer service gesture with it.

---

### Possible non-compliant delay in meter installation

A customer had solar panels installed and requested a new meter on 7 February 2019. The retailer advised that the meter would be installed in 15 business days, but this did not occur. He contacted the retailer on multiple occasions and was told that the delay was due to the contractor and the retailer could not provide a definite installation date.

EWON investigated the customer's complaint and the meter was installed on 11 March 2019. The retailer offered the customer a \$100 customer service credit for the delay and said it would also calculate an estimate for the missed solar generation and credit the customer accordingly.



# Digital meter issues

## Consumer access to data

### Retailer rejects customer request for proof of explicit informed consent for an account opened in his name

A customer received a phone call from a debt collection agency about a gas account with a retailer he believed he had never held an account with. The customer called this retailer to dispute the debt and was told that he held an account with it between October and December 2017. The customer disagreed with this as the gas had been in his wife's name at that time and asked for proof of where he provided explicit informed consent to open the account. The retailer advised it was not able to provide this information to him.

After contacting EWON, the customer agreed to have the complaint referred to the retailer at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.

Following the referral, the retailer advised EWON that it had reviewed its call recordings and explicit informed consent had not been provided. The debt was waived, and a default listing that had been recorded was also removed.

---

### Retailer has trouble getting meter data providers to provide meter data

After receiving a bill for \$1,259, which was four times the amount of her usual bills, a customer contacted EWON to dispute it. EWON referred the complaint to the customer's retailer at a higher level for resolution. Dissatisfied with the outcome, the customer returned to EWON to have the complaint investigated.

During EWON's investigation, the retailer experienced considerable difficulty getting its meter data provider (MDP) to provide the necessary data needed to investigate the complaint. There were extensive delays in the Metering Data Provider providing the meter data to the retailer and the MDP would often not respond to the retailer's escalating requests. The issue was made worse by the meter data omitting certain periods. The retailer also had to deal with two different MDPs due to the time period the data covered.

The retailer was ultimately unable to obtain all the necessary meter data for EWON to investigate the customer's billing. In recognition of this, the retailer offered to waive the balance of \$679.60 and apply a \$300 customer service credit. The customer was satisfied with this outcome.

EWON will treat this matter as a systemic issue and raise it with the retailer directly.

---

### Meter data not used for billing can confuse consumers

The exported solar generation recorded on a customer's bills was lower than expected after the retailer installed two digital meters. The customer contacted EWON to dispute the electricity bill. The complaint was referred to the retailer at a higher level for resolution but the customer returned to EWON not satisfied with the outcome.

EWON investigated the customer's complaint and asked the retailer to obtain meter data from its meter data provider. There were delays in the meter data provider supplying the data and further issues with the data supplied not being primary data. When EWON analysed the meter data, we found that the export generation data for one of the meters appeared to be missing from the customer's bills which suggested the customer had been under-credited for his exported electricity.

The retailer was initially unable to explain the discrepancy. It said the second meter was a 'check meter' and the exported electricity recorded in its meter data was not used for billing. EWON ultimately concluded the billing was accurate and the retailer offered to remove the second meter to avoid future confusion.



# Digital meter issues

## Online portals

### Customer unable to access meter data online

In September 2017, a customer transferred his electricity account to a new retailer, on the assurance that he would be able to view his consumption and export data online. When he received a higher than expected bill that he disputed, the customer tried to access his meter data online but could not do so. After multiple assurances from the retailer that the issue would be fixed, the customer contacted EWON and we referred the complaint back to the retailer at a higher level.

The customer returned to EWON as he was not satisfied with the outcome and asked us to investigate the billing and provide him with a copy of his meter data. EWON's investigation concluded the billing was accurate, though the online portal problem could not be resolved.

It took numerous months for the retailer's meter data provider to supply correct meter data in a format that complied with national meter data standards. When EWON asked if this could be provided to the customer, the retailer advised it could only be passed on to the customer as a non-editable PDF file as it had come across issues where customers had 'manipulated the data' after receiving it. EWON advised this was not satisfactory as it would be useless for performing calculations and analysis. After the issue was escalated, the retailer agreed that the data could be provided to the customer in a spreadsheet.

---

### Discrepancy between retailer's online portal data and data on customers bills

A customer received two consecutive electricity bills that he considered to be high. As he had a digital meter, the customer checked his online account and it stated the billing was based on estimated data, however his bills said they were based on actual reads. He contacted the retailer to dispute the bill and query the discrepancy with the online data, but subsequently received an impending disconnection notice for the unpaid, disputed bill.

EWON's investigation concluded that the customer had been appropriately billed on actual meter readings. This meant the online data which showed estimated readings was incorrect. The retailer acknowledged issues with its customer service and online portal and offered the customer a \$50 customer service gesture, which the customer accepted.

---

### Customer has a remotely read digital meter but retailer's online portal shows estimated consumption

A customer came to EWON with a high bill complaint and mentioned difficulties in reviewing his electricity consumption online. Despite having a digital meter that had been installed by the retailer, the online portal appeared to show estimated daily averages, rather than actual data.

EWON investigated the billing and concluded the customer had been overcharged for electricity consumption. This was corrected, but the retailer advised it is not required to provide 'live' data on its online portal even if a customer has a remotely read digital meter. The retailer also said that customers should not rely on it if they need an accurate representation of their electricity consumption. In recognition of the overcharging and customer service issues, the retailer offered the customer a \$500 goodwill credit, which the customer accepted.



# Water

## Continuous odour emanating from new sewerage infrastructure

In September 2018, a customer contacted EWON about sewerage infrastructure recently installed by the water provider near the customer's home. The customer complained that since the works were completed, there was a foul odour coming from the sewer main. The water provider performed further work on the sewerage main following his complaint, however, the odour returned after two months. The customer made further complaints and the water provider responded by directing him to its policies. The customer contacted EWON and agreed to have his complaint referred to the water provider at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.

The customer contacted EWON again in late November 2018. He complained that the water provider did perform further work, but the result was an even worse odour. The customer also complained the water provider was unresponsive. EWON contacted the water provider and further work was completed at the site in January 2019, however, the customer subsequently informed EWON that the odour continued. EWON negotiated with the water provider and the customer about what further action could be taken. The customer and water provider agreed that a water cushion would be used to contain the odour, although this could take four months to install.

---

## Customer required to pay his water account by direct debit

A customer complained to EWON after he purchased an apartment in a planned community and tried to open a water account with the water provider, a WICA licensee. The water provider advised the customer that a direct debit authorisation was required to open an account. The customer told EWON that he did not want to pay his bills by direct debit. He had advised the water provider, but the complaint remained unresolved.

The customer agreed to have his complaint referred to the water provider at a higher level, knowing he could return to EWON if an agreed outcome could not be negotiated.

---

## The water provider notified customers that it will no longer be offering monthly direct debit payments

In February 2019, a customer contacted EWON after he received a letter from his water provider stating that his monthly direct debit payments options would cease in May 2019. The customer complained that the water provider's decision to stop monthly direct debit payment arrangements concerned him more broadly as it could also financially disadvantage others. The customer contacted the water provider directly and he was told that he could still make monthly payments by nominating an amount to pay towards his account each month, but the water provider would no longer calculate the monthly payment required.

EWON provided the customer with information about his payment options but confirmed that the water provider was not required to provide this service. The case was closed as a complaint enquiry. EWON also contacted the water provider to confirm the information provided by the customer and to clarify the reasons for its decision to discontinue offering this type of payment arrangement. The water provider advised EWON that it could no longer offer monthly direct debit payments due to a new billing system being implemented. The water provider noted that it may consider offering this payment method again after the new system was in place. EWON will follow this up later this year.