



POSITION STATEMENT

Virtual Power Plant (VPP) complaints

EWON's role

The Energy & Water Ombudsman NSW (EWON) is the industry-based Ombudsman scheme which provides all NSW energy and some water customers with free, independent dispute resolution services.

We work towards achieving fair and reasonable complaint outcomes for all parties, provide leading customer service and influence energy and water public policy. We are not a consumer advocate, nor do we represent industry.

We achieve outcomes for complaints based on laws, codes and regulations, good industry practice and by considering the individual circumstances of each complaint and parties to the complaint. This may include consideration of prior complaint outcomes, independent legal, technical, or regulatory advice, and where they exist, special customer circumstances. Position and Approach Statements provide information to both customers and industry on how we consider specific complaint issues.

Virtual Power Plants (VPPs)

A Virtual Power Plant (VPP) is a network of distributed energy resources, such as home batteries, rooftop solar systems, and electric vehicle chargers. These devices are connected and controlled through a central platform, operating together as a flexible and responsive energy resource. A VPP coordinates when connected devices charge or discharge to help balance supply and demand on the electricity grid. Stored energy can be discharged to the grid when needed, and devices can charge and store energy when demand is low.

To join a VPP, a customer must allow the energy retailer or VPP operator to remotely access and control their device. VPP contracts differ significantly between providers. Some are bundled with a customer's energy retail contract, while others are stand-alone contracts separate from the customer's retail plan. VPP complaints are often complex and may require review of multiple contracts and sources of billing, usage, and performance data.

EWON's position

EWON will closely review VPP complaints and investigate in line with [EWON's Charter](#). EWON's jurisdiction extends to matters where the customer has been impacted, regardless of whether the product is regulated under the National Energy Retail Rules (NERR) or National Electricity Rules (NER).

EWON will investigate a range of VPP issues, including but not limited to:

- > marketing practices and explicit informed consent
- > compliance with contract terms and conditions
- > billing errors and high bill disputes
- > affordability issues
- > product performance and functionality (including latency, curtailment, app performance, and customer rewards).

EWON's investigation of VPP complaints will focus on whether the customer has experienced detriment, confusion, or unmet expectations. The regulatory status of VPP products does not limit EWON's ability to investigate complaints about the conduct or responsibilities of:

- > a member
- > a white label brand operating under the authorisation of a member
- > a member's agent.

EWON applies a consistent approach across all members, guided by key principles in the [EWON Charter](#):

- > EWON may consider complaints about services that materially affect the customer, including emerging products such as VPPs
- > EWON's role is to promote fair outcomes and accountability, even when regulatory frameworks are still developing
- > EWON applies consistent standards to ensure customers are not disadvantaged by regulatory gaps.

This approach ensures EWON can deliver fair, consistent, and transparent outcomes for customers and members as the energy market continues to change and new technologies evolve.

EWON offers information on other relevant topics, including:

- > [solar energy](#)
- > [high energy bills](#)
- > [changing retailers](#)
- > [EWON's complaint process.](#)