



Energy & Water  
Ombudsman NSW

# EWON Insights

## Complaints Analysis

1 October 2019 - 31 December 2019



**Energy & Water  
Ombudsman NSW**

**Freecall** 1800 246 545  
**Web** [ewon.com.au](http://ewon.com.au)  
**Email** [omb@ewon.com.au](mailto: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 October - December 2019	4
Overview	5
<i>Figure 1 - Complaint activity</i>	5
Complaints received	6
<i>Figure 2 - Complaints received October - December 2019</i>	6
Top 10 issues	7
<i>Figure 3 - Top 10 issues October - December 2019</i>	7
Energy issues	8
<i>Figure 4 - Electricity and gas complaints by case category October - December 2019</i>	8
Affordability	9
Concessions and rebates	10
Billing	11
Complaints received through our Community Outreach program	12
Information provision	12
Referrals	15
Water	16
<i>Figure 5 - Cases opened and closed</i>	16
<i>Figure 6 - Top 6 issues October - December 2019</i>	16
Water issues	18
Embedded networks	20
<i>Figure 7 - Cases opened and closed</i>	20
<i>Figure 8 - Top 10 embedded network issues</i>	20
Inadequate information about embedded networks available for home buyers and prospective tenants	21
Bundled energy-related services provided by embedded network operators	22
Network interruptions for embedded network customers	23
Appendix	24



# Introduction



**5,127**  
**COMPLAINTS RECEIVED**  
down from 5,606 last quarter

**↓ 8.5%**

decrease in complaints  
compared with last  
quarter

**↓ 25%**

decrease in complaints  
compared with the same  
period in 2018/2019

## Complaint environment

Our October to December 2019 results saw an 8.5% decrease in complaints, 5,127 down from 5,606, and 25% lower than the same period in 2018.

The decrease occurred during a continued period of price stability in the energy market where network prices fell, and retail prices remained relatively steady.

Energy retailers' customer service standards continued to improve. Complaints associated with poor customer service declined by almost 40%. Those related to 'failure to respond' to customers, declined by 57%; a contributing factor being our work with retailers to improve their refer to higher level complaints management.

This improvement is very timely in light of the devastating bushfires and the ongoing drought – events where for affected customers, excellent customer service is essential.

In the first half of this financial year, the ACCC Inquiry into Retail Electricity Supply and Pricing led to several significant customer protection reforms. This included introduction of the Default Market Offer on 1 July 2019. Retailers were also required to release new affordability policies by 3 October 2019 addressing mandatory requirements in the Australian Energy Regulator's Customer Hardship Policy Guideline.

### Declined payment arrangements on the increase

Most retailers have responded very positively to the new Guideline requirements. However, disappointingly, complaints to EWON about payment arrangements being declined, have increased by 21% when compared to the prior quarter, and by 93% when compared to the same quarter in 2018 (up from 100 to 193). We are addressing this directly with a small number of retailers.

It takes time to embed new policies and processes and going forward we expect to see fewer customers requiring EWON's assistance to access affordability support from their retailer. We will continue to closely monitor affordability-related complaints to ensure the Guideline is working. We will work with retailers and report to the AER any potential breaches as part of our regular compliance reporting.

## Themes of this report

This quarter we look at complaints received through our community outreach program. We hold monthly bill support days hosted by community organisations, as well as our larger Bring Your Bills Days attended by a range of government and community services and increasingly, by energy and water retailers and energy networks. These events target potentially vulnerable consumers including people with limited English skills, those on low incomes, seniors, Aboriginal people and those with disabilities.

Case studies in this Report highlight the benefits for customers of meeting with members of our team and staff from other services, and retailers face-to-face in local community centres. Many of the customers we see would not contact EWON over the phone for assistance – either because they are not aware of our services, are unaware of their rights or are not comfortable advocating for themselves.

Often people come to outreach events seeking information about their bills, rebates, tariffs and issues that had they known their rights, they could have spoken to their retailer about, but instead opted not to, or tried and didn't receive the help they sought.

Our Bring Your Bills Days provide the opportunity for us to address affordability challenges holistically by referring customers to other services at the event for specific help. These may include financial counselling, payment assistance, housing and legal support and much more. Importantly, attending our outreach events gives energy and water providers the opportunity to meet with their customers, gain a better understanding of their needs, and build relationships that foster future telephone contact.

Our community outreach program has been endorsed as best practice by Queen Margaret University through its recent Independent Review of EWON. The Review recommendations are currently being considered by the EWON Board. I will write to all members about the overarching outcomes of the Review in the near future, and we will consult broadly about changes arising from the Review.

In the meantime, let's all work together to assist customers and communities affected by bushfires and drought – they need our collaborative support.

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





# Complaint activity

October - December 2019



↓ 8.3%

decrease in electricity complaints compared with last quarter



↓ 15.9%

decrease in gas complaints compared with last quarter



↓ 13.8%

decrease in water complaints compared with last quarter

## ELECTRICITY

The 3,764 electricity retail complaints we received during the period represents an 8.3% decrease from last quarter's 4,105 complaints and a 28.0% fall compared with the same quarter last year, when there were 5,230 complaints. Network complaints increased slightly, up 235 from 202 in the previous quarter, but decreased from the 248 received in the same quarter the previous year. Total electricity complaints fell by 7.2% to 4,097 compared to the previous quarter and by 26.8% compared to the 5,594 received in the corresponding 2018 quarter.

## GAS

The number of gas retail complaints received this quarter (755) decreased by 15.9% compared with the previous quarter (898) and by 23.4% compared to the corresponding period in 2018 (986). The numbers of gas network complaints (42) increased by two from the previous last quarter but fell by two complaints in comparison to the same period the previous year (44). At 810, overall gas complaints were 14.6% lower compared to 949 complaints received last quarter and 22.1% lower compared to the same quarter the previous year (1,040).

## WATER

The number of water complaints received this quarter (200) decreased by 13.8% compared to last quarter (232) and by 2.0% compared to the corresponding period in 2018 (204).

## EXEMPT ENTITIES

We received 19 complaints from customers of exempt entities this quarter. This was double the nine complaints in the previous quarter. However, this was still a 48.6% decrease compared to the same quarter in 2018. This is due to many exempt retailers becoming members of EWON, and their complaints now being counted in the 'Retailer' category.



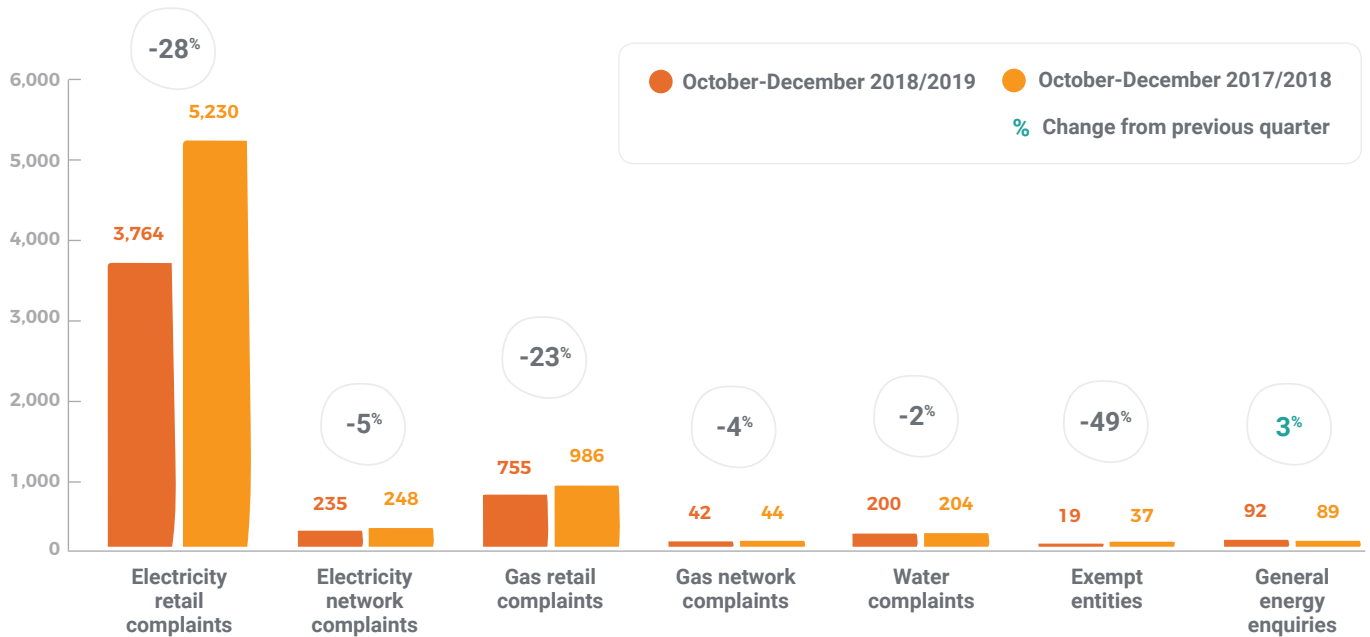
# Complaint activity

## Complaints received

### Complaint activity overview

Complaints received this quarter decreased by 8.5% (5,127 down from 5,606), owing to fewer complaints from electricity, gas and water customers. They fell by 25.3% compared to the same period in 2018 (down from 6,861 to 5,127).

Figure 1: Complaint activity



### Customer complaint issues

High bill complaints numbered 1,862, an increase of 7.6% on the 1,731 received last quarter. Disputed high bills continued to be the most significant billing issue, representing 18.4% of all issues raised this quarter. This issue was down significantly from the same quarter the previous year when it drew 2,343 complaints.

We have been monitoring complaints relating to payment difficulties and having a payment arrangement declined to gauge the impact on new retailer affordability policies implemented during the period in response to the Hardship Guideline introduced by the Australian Energy Regulator in March 2019. We had 193 complaints about payment arrangements being declined, a 21.4% increase on the previous quarter. The issue is up 93% compared to the same period in 2018 when there were 100 complaints. We expect complaints with this issue to decline once retailer bed down the new approach to customer affordability management.

Retailers' customer service continued to improve. Complaints concerning poor customer service declined by 39.0%. 'Failure to consult' complaints were down by 34.7% and those about incorrect advice or information fell by 20.4%, when compared to the same quarter in 2018.

The customer service issue 'failure to respond' declined by 57.4%, from 975 in 2018 to just 415 complaints this quarter.

Customers coming to EWON just prior to disconnection (218) fell by two compared to the previous quarter but rose by 68 compared to the same quarter in 2018.

Customers approaching EWON with payment difficulties fell by 44 compared to the previous quarter. However, they accounted for a higher percentage of issues raised than in the same quarter the previous year - 4.0% compared to 2.9%.




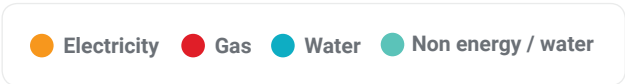
# Complaint activity

## Complaints received

**Figure 2: Complaints received October - December 2019, including previous quarters**

Figure 2 provides more detailed information about the number of complaints received from April to June 2019, in comparison to the previous four quarters.

Provider type	Oct-Dec 2019	Jul-Sep 2019	Apr-Jun 2019	Jan-Mar 2019	Oct-Dec 2018
 Retailer	3,764	4,105	4,127	4,879	5,230
Network	235	202	222	257	248
Exempt retailer	18	9	28	35	34
Not allocated	80	100	56	89	82
<b>Total</b>	<b>4,097</b>	<b>4,416</b>	<b>4,433</b>	<b>5,260</b>	<b>5,594</b>
 Retailer	755	898	835	1,052	986
Network	42	40	39	47	44
Exempt retailer	1	0	1	2	3
Not allocated	12	11	6	7	7
<b>Total</b>	<b>810</b>	<b>949</b>	<b>881</b>	<b>1,108</b>	<b>1,040</b>
 Retailer	118	142	116	124	131
Network	65	65	73	84	54
Not allocated	17	25	25	15	19
<b>Total</b>	<b>200</b>	<b>232</b>	<b>214</b>	<b>223</b>	<b>204</b>
 Non-energy/Non-water	20	9	23	6	23
<b>Grand total</b>	<b>5,127</b>	<b>5,606</b>	<b>5,551</b>	<b>6,597</b>	<b>6,861</b>





# Top 10 issues

October - December 2019

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

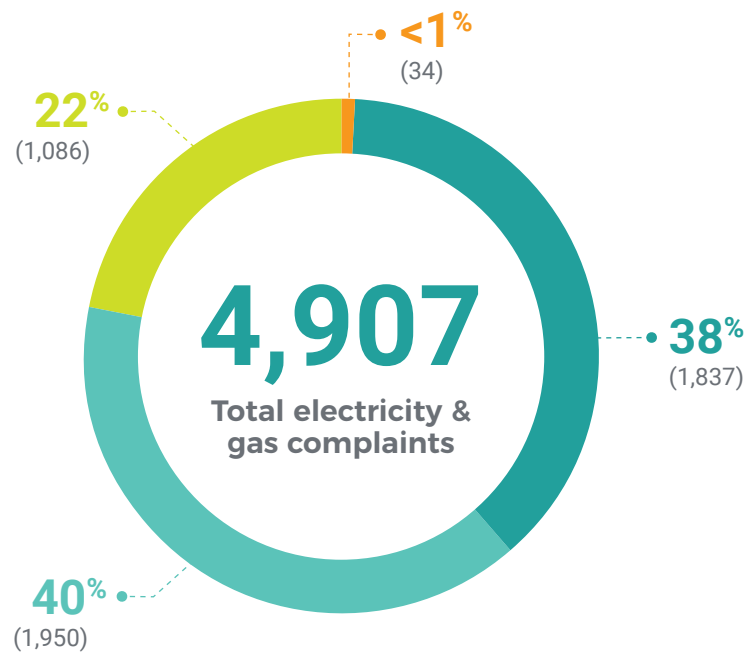
Primary and secondary issue	Oct-Dec 2019	Jul-Sep 2019	Apr-Jun 2019	Jan-Mar 2019	Oct-Dec 2018
<b>1</b> High, disputed	1,862	1,731	1,587	1,875	2,343
<b>2</b> Poor service	1,079	1,113	1,130	1,494	1,770
<b>3</b> Estimation, meter access/not read	513	412	443	555	558
<b>4</b> Opening/closing account	466	513	449	574	589
<b>5</b> Failure to respond	415	404	530	800	975
<b>6</b> Payment difficulties, current/arrears	407	451	548	470	404
<b>7</b> Incorrect advice/information	382	388	343	433	480
<b>8</b> Failure to consult/inform	256	270	262	289	392
<b>9</b> Disconnection/restriction, Impending	218	216	251	218	150
<b>10</b> Collection, Credit rating	210	307	245	246	266
<b>Total number of issues per quarter</b>	<b>10,138</b>	<b>10,217</b>	<b>10,799</b>	<b>12,727</b>	<b>13,932</b>

● Billing
 ● Customer service
 ● Credit



# Energy

Figure 4: Electricity and gas complaints by case category







# Energy issues

## Affordability

### CASE STUDY

#### Customer with visa problems approaches EWON about energy plan affordability

A customer attended a Bring Your Bills Day event in Earlwood with a recent high bill. The customer did not have a current work visa and although she thought her visa situation would be addressed in the next month, she required assistance with her outstanding bill. She advised she had already used her EAPA allocation for the year.

The customer wanted EWON to confirm she was receiving all applicable rebates and discounts. She also asked for advice regarding payment options for her outstanding bill.

As the customer was unable to make any payments towards the account until the next month, we

contacted the customer's retailer to discuss her situation. The retailer placed a hold on the account until 27 December 2019 and agreed to assess the customer's suitability for its hardship program once she had her visa.

We confirmed the customer was receiving all rebates she was eligible for and referred her to an EAPA agency at the event. This agency established when she was next eligible to receive EAPA and provided her with future EAPA referrals. We also referred the customer to Service NSW at the event to complete a review of her current electricity plan using its Energy Switch comparison tool.

### CASE STUDY

#### Customer unable to pay electricity account by due date

A customer attended EWON's Bring Your Bills Day event in Woy Woy. She advised she was not able to pay her outstanding account balance by the due date, despite having received a payment extension. She had been told verbally by her retailer that she would be disconnected if her account was not paid by the due date.

The customer advised she could increase her regular payments to \$25 per fortnight. She said she would make an appointment with a community agency to request EAPA.

The customer's disputed bill was based on an actual meter reading she considered to be too high and requested a billing review to ensure her billing and meter reading were accurate.

We reviewed the matter following the event. The retailer advised there was no disconnection order and that it considered the customer's billing to be appropriate. It also said that the customer had been removed from its affordability program in August that year because she had not made the agreed payments. The retailer agreed to consider putting the customer back on the affordability program and provide assistance with a payment arrangement if she got in contact. The retailer offered a \$100 customer service gesture as a one-time offer.

The customer advised us that she had accepted her retailer's offer to resolve the matter based on a customer service gesture of \$100 applied to her account. She was referred to community agencies for an EAPA assessment and financial counselling.



# Energy issues

## Concessions and rebates



### CASE STUDY

#### Customer not receiving rebate he is eligible for

A customer approached EWON at a Bring Your Bills Day event in Blacktown. He required an Arabic interpreter.

The customer, a pensioner, asked us to check he was receiving the appropriate discounts and rebates on his electricity and gas bills.

We spoke to the customer's retailer which advised that the Low Income Household Rebate was applied to the electricity and gas accounts at the customer's previous address, but not at his current address. The retailer had offered to apply the rebate at the current address and backdate it for 12 months.

When we advised the customer this, he felt it was unfair given he had been living at his current address for two years. We offered to investigate the matter following the outreach event.

The retailer confirmed it could not backdate the rebate for more than 12 months. After the backdated rebate was applied, the retailer advised that the customer's energy accounts were in credit. It also confirmed that the customer was receiving a 23% pay on time discount for electricity and a 20% pay on time discount for gas.



### CASE STUDY

#### Customer enquires if they are eligible for rebates and discounts

A customer attended an EWON Bring Your Bills Day event in Earlwood. She wanted to get information about the types of discounts she might be eligible for, after noticing there were no discounts or concessions applied to a recent bill.

We contacted the customer's retailer which advised the customer was on a standing offer and had never had a concession or discount applied to her

account. The retailer offered to apply the Low Income Household Rebate and back date it for 12 months. The retailer also said it would make the customer a market offer once she got in contact.

We referred the customer to Service NSW to review energy offers using it Energy Switch comparison tool and to an EAPA agency for assistance, both of which were at the event.

[VIEW MORE CASE STUDIES](#)



# Energy issues

## Billing



### CASE STUDY

#### Customer seeks assistance with arrears from a previous account

A customer approached EWON at a bills support event in Blacktown.

The customer, a sole parent with a toddler not receiving child support, was living in a private rental while on the waitlist for public housing. The customer came to our outreach event seeking assistance with managing the arrears from a closed account connected with her previous address. Her retailer would not allow her to pay less than \$50 per fortnight but she said she would struggle to pay this much.

EWON found that her concession details had not been applied to the closed or current account. The customer advised that she had provided this information to the provider. Her retailer confirmed during a phone call that day that it would organise her concession to be added and backdated.

In relation to the arrears from her previous address, we advised the customer she had two options. The first was to have the debt from her closed account transferred to her current account. She could then apply for Energy Accounts Payment Assistance (EAPA) to be applied to that account. The second option was to apply for debt relief. This would require a letter of recommendation from a financial counsellor, doctor or social worker stating the reason for her request that the debt to be waived. This would be sent to her retailer for its review and response.

The customer decided to try the second option. The customer advised us that she would make an appointment with a social worker at Centrelink to organise debt relief.

[VIEW MORE CASE STUDIES](#)



# Complaints received through our Community Outreach program

## Information provision

Many customers at EWON outreach events are seeking information. The following case studies highlight the wide range of issues that EWON staff provide detailed information on. EWON classifies most of these encounters as complaint enquiries. In some instances, the information provided does not necessarily directly relate to the customer's retailer, but some do highlight that customers find getting general information from an energy or water provider difficult.

### Customer harassed by energy broker

At a Bring Your Bills Day event in Earlwood a customer complained that she had received multiple calls from an energy broker. EWON was able to advise her of the Do Not Call register. We also referred her to Service NSW at the event to use its Energy Switch tool to compare energy offers.

---

### Customer seeks billing clarification

At the Earlwood Bring Your Bills Day a customer presented with an overdue notice from his retailer. The customer said that he had paid the bill and was seeking confirmation of this. EWON checked with the retailer and it confirmed receipt of the payment. EWON was able to inform the customer that he had a \$0 balance on his account.

---

### Customer seeks information on Default Market Offer

A customer at the Earlwood Bring Your Bills Day said that he had received a letter from his retailer about the Default Market Offer (DMO). We checked his account and established that he was on a market offer. We explained what the DMO is and that it did not affect the customer because he was on a better offer. We also referred him to Service NSW at the event to use its Energy Switch site.

---

### Customer's eligibility for rebates

A customer at a Bring your Bills Day event in Blacktown sought information about rebates. The customer was a newly arrived migrant and held a Commonwealth Seniors Health Card. We checked his account and found that his contract provided a discount. We also established that the customer was not eligible for the NSW Government Low Income Household Rebate but that he was entitled to the NSW Seniors Energy Rebate of \$200. We took the customer to Service NSW which was also at the event for assistance with his application.

---

### Customer on a payment plan asks how changing retailers would affect her

A customer at a Bring Your Bills Day event in Woy Woy with an existing payment plan with her retailer wanted to know how she would be affected if she transferred to a different retailer. We pointed out that consumer protections for closed accounts were weaker and that her current payment plan might not apply to a closed account. EWON also pointed out that Energy Accounts Payment Assistance (EAPA) could not be applied to closed accounts. We encouraged the customer to contact her current retailer to discuss a better market offer.

---



# Complaints received through our Community Outreach program

## Information provided on private poles and the point of connection

At a Woy Woy Bring Your Bills Day event a customer asked for information about a private pole on her property. She had been told by the distributor that the pole required some maintenance which she had to pay for. She asked us if she could use an alternative point of connection from a laneway that had an energy supply to avoid paying for maintenance. We explained that in both cases she was financially responsible and that moving the point of connection would be expensive and require permission from the distributor. We directed her to the distributor's website to get more information so she could make an informed decision.

---

## Digital meter installation confusion

A customer sought information at a Bring Your Bills Day event in Earlwood about a digital meter installation. She said she had requested a new digital meter because she was receiving estimated bills even when she left her gate unlocked. The technician had left a card, saying work had to be completed on the meter board before a new meter could be installed. The customer was confused and didn't understand why this was her responsibility. She thought she would be without supply from the time work on the board was completed until the new meter was installed.

We explained the rules relating to estimated billing and special meter reads and clarified that an electrician could fix the meter board in such a way that supply would be maintained until a new meter was installed. We investigated the matter after the event to clarify what actual work was required by the customer's retailer.

We found that the meter board required an isolation switch before a new meter could be installed. We were also able to clarify with the customer that this work needed to be undertaken by a qualified electrician and that it was not the retailer's responsibility. We assured the customer that having this work undertaken would not leave her without power.

---

## Customer with an LPG account seeks information about payment assistance

A customer brought an LPG gas bill from a company that was not an EWON member to a bill support session at Woy Woy. We explained that LPG was out of our jurisdiction and that, while EAPA did not apply to LPG accounts, there was a gas rebate available. We referred the customer to the Service NSW office in Woy Woy to apply for the gas rebate and advised him to check his electricity bill to see if he was receiving the Low Income Household Rebate.

---

## Energy customer asks for help setting up Centrepay arrangement

At the Waterloo Housing Tenants Health and Community Expo, a customer approached us seeking assistance to set up a Centrepay arrangement. She said that she had spoken to her retailer but had not received any help. We rang the retailer and got the information the customer needed to have Centrelink set up the arrangement. We also checked the customer's rebate information. We found that that the account had not been set up with the correct details when a social worker had assisted the customer with the process. This was rectified and the retailer indicated that the Low Income Household Rebate would be applied and backdated to the customer's move in date.

---

## Advice provided on solar feed in tariffs

A customer with solar enquired about her bills at a bill support session in Blacktown. She had upgraded her solar panels the year before expecting that her bills would decrease, but instead they had increased. She had contacted her retailer and it referred her to her solar installer to have the panels checked. We reviewed her bills and identified that the customer still had a gross meter, which meant that all of her solar generation was exported to the grid for a low feed in tariff and all of her consumption was being charged at a higher rate. We advised her to contact her retailer to arrange for a digital meter to be installed which would only export her excess generation and therefore reduce her bills.



# Complaints received through our Community Outreach program

## Customer given information about Time of Use tariffs

At a Bring Your Bills day event in Blacktown a customer spoke to us about his higher than expected bills. We explained that he was being billed on a Time of Use tariff and provide advice on usage patterns to reduce his bills.

---

## Information provided on metering arrangements

A customer approached EWON at our stall at the Orange Show and advised that he had a property with a shed that was on a separate meter and being billed on a business tariff. The shed was hardly ever used, but he had to pay a \$160 per quarter service availability charge. He wanted advice about how to change this to a residential rate. We agreed to investigate the issue for the customer.

The customer's retailer advised us that it could request a change to a residential rate, but the decision whether to grant it was at the distributor's discretion. It also indicated that this could require a meter replacement. EWON queried the situation with the distributor which said that the shed was listed as a shearing shed and that as such it was required to be billed as a business account. The distributor suggested that the best solution was for the customer to employ an electrician to rewire the shed to the domestic meter and to request the abolition of the business meter. This information was then provided to the customer.

---

## Information provided on how to read bills and energy efficiency

At a Bring your Bills day event in Blacktown a customer asked for assistance to understand her bills. After reviewing her bill, we told the customer she was receiving a 25% discount and the Low Income Household Rebate. We also advised her that the consumption was appropriate for the size of the household. We talked to her about payment options and energy efficiency and gave her an EWON bag with a plug-in power meter, a door snake, a water efficient shower head and our factsheets.

---



# Complaints received through our Community Outreach program

## Referrals

Government departments, community services and energy and water providers take part in EWON's Bring Your Bills Days. This provides a real benefit to customers as we can make direct, face-to-face referrals to providers, community organisations such as St Vincent de Paul and the Salvation Army, or government agencies like Revenue NSW and Legal Aid. When a provider is not at the Bring Your Bills Day, we call them and try and solve the customer's problem there and then. If a service we would like to refer the customer to is not there, we provide the customer with its contact details.

### Advice on how to read bill and tariff options

A customer brought her winter bill to a Bring Your Bills Day event in Woy Woy. She was curious about the increase in the bill, as she felt her consumption had been steady over the previous three quarters. Her bill appeared to be accurate so we asked her about the appliances she used. We identified that she had used a new heater a lot. We provided advice on the benefits of off-peak supply for hot water and different tariff options including Time of Use. We also explained how to read a meter so that she could check the bills herself. Equipped with this information, the customer visited her retailer's stall at the event to further discuss how to reduce her bills.

### Assistance with debt from closed account

At a Bring Your Bills day event in Woy Woy a customer approached us concerned about a debt. She said her partner had gone to jail and she had transferred the account to her name. She then had to move house as she couldn't afford to live at the old home by herself. The retailer transferred the debt on the account to a collection agency, but the customer was unemployed and unable to pay it. We referred the customer to her retailer at the event, to discuss the possibility of it waiving the debt. We advised the customer she could return to the EWON stall if the retailer was unable to assist her.

### Customer referred to agencies for help with a high bill

At a Bring Your Bills day event in Earlwood a customer advised us that he had received a high winter bill. We discussed his energy use and identified that he was using a new electric heater during the billing period. We called the customer's retailer and confirmed that he was on the best available offer and that he was receiving the Low Income Household Rebate. Service NSW was at the event, so the customer was able to compare his current contract with those of other retailers using its Energy Switch tool. We also referred the customer to a community agency at the event where the customer received EAPA.

### Customer referred to agencies for payment assistance

At a Bring Your Bills Day at Earlwood a customer told us he was always struggling to pay his bills. He wanted us to check if he was getting the right discounts and rebates. We reviewed the customer's bills and found that he was receiving a discount and the Low Income Household Rebate. We provided the customer with information on energy efficiency and referred him to an EAPA agency at the event, and to Services NSW to have his current contract compared to other offers using its Energy Switch tool.



# Complaints received through our Community Outreach program

## Customer needs tenancy assistance and information on tariffs

At a Bring Your Bills Day event in Woy Woy a customer sought information about her high bills. We reviewed her bills and confirmed she was receiving discounts and a rebate. We noted high usage in peak periods and provided information regarding Time of Use (TOU) tariffs, directing her to distributor's website which had good information on TOU tariffs and their impact on billing. During the conversation, we identified the house she lived in had plumbing and wiring issues. The customer said that she didn't know how to raise these issues with her landlord so we referred her to the Central Coast Tenants Advice & Advocacy Service which was at the event.

---

## Referral to Housing Appeal Committee

We were approached by a customer and her social worker at a Bring Your Bills Day event in Earlwood. The customer said that she had previously lodged a complaint with EWON concerning high bills. She said she lived in public housing that is in poor condition. We looked at the customer's previous complaint and noted that at that time there was no apparent error in the billing. The customer explained that the hot water system had been leaking but that it was now fixed. The customer also said there was buzzing from some power points and that only three lights were working. She told us the landlord would not repair the premises and had rejected a request for a transfer.

We reviewed the customer's bills and found that a rebate and relevant discounts were being applied. We also identified that the customer was in her retailer's affordability program and had an affordable payment plan. We then provided a referral to the Housing Appeals Committee for assistance with the housing issues.

---



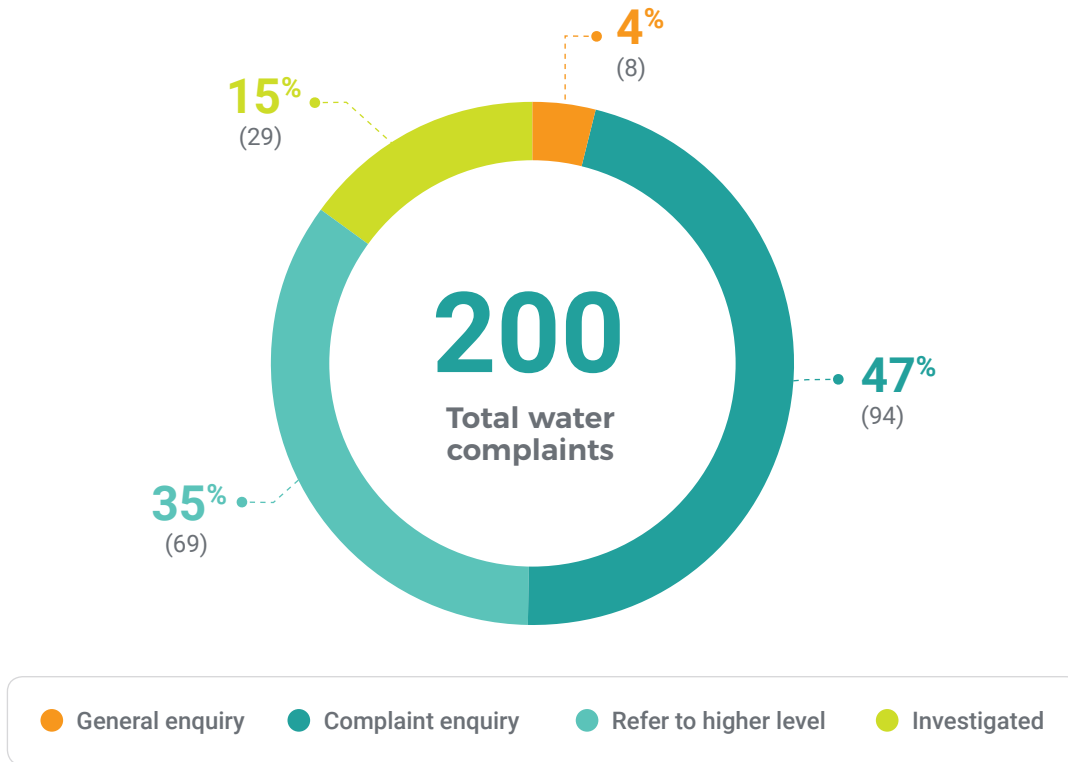


# Water

The number of water complaints received this quarter (200) decreased by 13.8% compared to last quarter (232) and by 2.0% compared to the corresponding period in 2018 (204).

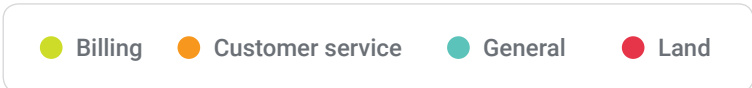
High bills continue to be the biggest issue for water customers who contact us. Other complaints to about water providers relate to customer service and maintenance of network assets, as seen in Table 4 below.

**Figure 5: Water complaints**



**Figure 6: Top 6 water issues**

Primary and secondary issue	Oct-Dec 2019	Jul-Sep 2019	Apr-Jun 2019	Jan-Mar 2019	Oct-Dec 2018
<b>1</b> High, disputed	42	50	38	40	40
<b>2</b> Poor service	38	34	29	35	31
<b>3</b> Failure to respond	33	29	33	29	29
<b>4</b> Energy/water	30	31	28	26	28
<b>5</b> Network assets/maintenance	27	18	14	17	13
<b>Total number of issues per quarter</b>	<b>170</b>	<b>162</b>	<b>142</b>	<b>147</b>	<b>141</b>





# Water issues



## CASE STUDY

### Customer receives bill for four years' of water charges

A customer contacted EWON after he was given a water bill of approximately \$5,000 by the new tenants of a commercial property he owned. The customer contacted the water provider and was told that the account was for unpaid water bills dating back to 2015. The provider confirmed that the bills had been issued to the supply address as agreed when the account was established. The customer initially complained to the water provider that it should have followed up on the debt or restricted the water flow at the premises, rather than allowing the bills not to be paid for four years. The customer was told that his complaint would be escalated, and he would receive a call back from a supervisor. The customer did not

receive a phone call and instead received an email confirming that the bills were payable and that water restrictions were not generally used for industrial buildings.

We referred the matter to the retailer for resolution at a higher level. The customer returned to EWON advising that his complaint was still unresolved. We contacted the water provider and requested information about the outstanding bills. After reviewing the billing again, the water provider advised that the debt remained payable but offered a credit of \$319.20 as a customer service gesture. The customer accepted this as a resolution to his complaint.



## CASE STUDY

### Neighbouring sewer causes odours at customer's home

A customer complained to EWON that she was experiencing ongoing problems with her sewerage service due to issues with a neighbouring golf course and the sewer main. The customer advised that the water level in her toilet had dropped significantly and strong odours were emanating from the sewerage service. She told us she had complained to the water provider and a technician had come to her house and replaced the meter. The water provider had also offered the customer a rebate of \$35 due to the loss of water pressure at her home.

We referred the matter to the provider at a higher level, but it asked us to investigate the complaint.

The provider advised that its contractors had visited the supply address multiple times and no odour issues had been identified. The contractors had water jetted the sewer main and sewer inspection shaft adjacent to the supply address as a customer service gesture, noting that this was not its responsibility.

The provider advised that the \$35 discount for loss of water pressure was for a separate issue that had been resolved. The provider also said the customer had verbally abused its contractors each time they had been to the house, and she continued to contact its call centre and be verbally abusive.

When we spoke to the customer, she disputed that the sewer inspection shaft had been cleaned by the contractors. We requested a copy of the provider's primary customer contact records relating to the inspections conducted at the property. Our review of the records identified that the sewer inspection main had not actually been jetted as the provider claimed. To resolve the complaint, the provider arranged a further inspection of the sewer main and requested that its contractors clean the sewer inspection shaft as previously offered to the customer. The customer confirmed that this additional work was carried out and the odour issues were resolved.



# Water issues



## CASE STUDY

### Water bills sent to rented property left unpaid

A customer contacted his water provider to request a tax invoice for an investment property he owned. The provider advised the customer that he had only paid two water bills in the last two years and all other charges were currently outstanding, but the customer said he had not received the bills. The provider explained that a bill sent to the customer's postal address had been sent back marked 'return to sender', so the billing had been redirected to the supply address. The customer was unhappy that his bills were being sent to the tenants of the property and lodged a complaint with EWON.

We referred this matter to the provider's specialist dispute resolution team. The provider and the customer resolved the complaint by agreeing to a payment plan of \$40 per month and the provider waiving \$27.56 in interest charges from the account.

However, the customer returned to EWON six months later to complain that he had not received the agreed bills from the water provider and instead received a bill requesting the entire arrears to be paid with interest.

We contacted the water provider to clarify why the payment plan had been cancelled. It advised that it had recently updated its customer management and billing systems, which involved the migration of all customer data from the old system to the new platforms. The new billing system did not recognise there was a payment arrangement in place for the customer, so he was issued with legal notices to recover the outstanding debt. The provider apologised for the error and re-established the payment arrangement of \$40 per month.



## CASE STUDY

### Low water pressure resulting from work on water main left unresolved

A customer contacted EWON to complain that he was experiencing an ongoing loss of water pressure at his home. The customer explained that the water provider conducted work on the water main years earlier and a restrictive valve was installed to prevent issues with pipes at the end of the line. The customer's home was at the top of a hill and the loss of water pressure started at the time this work was completed. The customer advised that he only received enough water pressure to take a shower during the times of day when his neighbours were more likely to be out. He also said that he had discussed the issue extensively with the water provider and had received conflicting advice about whether the issue could be corrected.

We notified the water provider of the complaint and

requested information about the action it had taken to resolve the issue. After six weeks, the water provider contacted us to advise that the pressure reduction valve located in the water main servicing the property has been inspected and was faulty. Two days later the water provider confirmed that the water reduction valve had been replaced and water pressure to the customer's home had been restored. We contacted the customer to confirm that the complaint had been resolved. The customer was aware that a temporary valve had been installed to correct the water pressure, but he had not been told when a permanent solution would be in place. After speaking to the provider, we advised the customer that a permanent replacement valve was on order and would be installed by the end of the month.



# Embedded networks

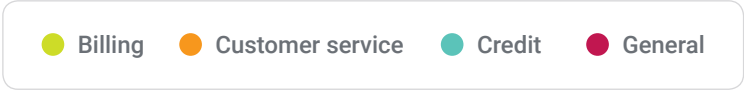
This quarter EWON opened 58 complaints and closed 63 complaints from customers whose electricity or gas is supplied through an embedded network.

**Figure 7: Cases opened and closed**



**Figure 8: Top embedded network issues**

Primary and secondary issue	Oct-Dec 2019
1 High, disputed	15
2 Failure to respond	8
3 Opening/closing account	6
4 Energy/water	5
5 Error, Other	4
6 Payment difficulties, Current/arrears	4
7 Fees & charges, Service availability	4
8 Failure to consult/inform	3
9 Error, Wrong meter	3
10 Poor service	3
<b>Total number of issues per quarter</b>	<b>64</b>





# Embedded networks

## Inadequate information about embedded networks available for home buyers and prospective tenants

Our engagement with customers indicates there is still not enough information available to home buyers and prospective tenants about embedded networks. Customers often complain to EWON that they had not been aware that embedded networks existed until they found their new home

was part of one. They also tell us that they were not given adequate information from their real estate agent about opening energy, hot water or air conditioning accounts with the embedded network operator.



### CASE STUDY

#### Customer purchased an apartment and discovered the building had an embedded network.

A customer complained to EWON that they purchased a new apartment and discovered that the building had an embedded network. The customer said they had no prior knowledge of embedded networks. The customer complained that their recent monthly electricity bill was for \$160, when they had previously

paid \$300 a quarter.

We provided the customer with advice about the regulation of embedded networks, the rights and responsibilities of embedded network customers, and the factors that may contribute to high electricity bills.



### CASE STUDY

#### Delay on opening account with embedded network led to disconnection

A customer complained to us after her electricity was disconnected for non-payment of her account. She had been disconnected previously by the embedded network retailer because she did not open an account at the time she moved in, but she said that the real estate agent had not provided her with correct information about how to open an energy account within the embedded network. Due to the delay in opening the account, the customer's first electricity bill was for \$1,500 and she got behind paying this backbill. The customer contacted the embedded network retailer and was told that she must pay the full balance of the account, at that time around \$1,000, before she could be reconnected. The

customer advised EWON that she could pay \$500 upfront and start a payment plan of \$100 a fortnight from her next payday in two weeks' time. She noted that she was unable to access the Energy Accounts Payment Assistance (EAPA) Scheme even though her account was with an authorised retailer because she lived in an embedded network.

We contacted the embedded network retailer and it agreed to reconnect the customer's electricity supply on the basis that she would make a payment of \$500 and agree to a payment plan. We asked the retailer to place the customer's account on hold for two weeks to allow her time to agree a payment plan.



# Embedded networks

## Bundled energy-related services provided by embedded network operators

We continue to receive complaints from customers about energy-related utility services provided by embedded network operators, namely hot water provision. As a metered service, where the cost of usage is based on the energy required to provide the service (electricity and gas), complaints about these utility services hinge on the same issues that make up

traditional energy complaints. From a customer's perspective, these services are just as essential as their electricity or gas service, but are not covered by the same energy-specific consumer protections. As with energy services, the Australian Consumer Law does not appear to provide these customers with an appropriate level of protection.



### CASE STUDY

#### An embedded network customer disputes the accuracy of her hot water billing

A customer moved into the embedded network and opened an energy account. Four months later, the customer's hot water service was disconnected without notice. He contacted the embedded network retailer who advised that he had not opened an account for gas and hot water at the same time as his energy account, and therefore no bills had been issued for 15 months. The customer opened a gas and hot water account, was reconnected, and received a backbill for hot water usage for \$1,230.66. The customer contacted the embedded network retailer and was told that the bill must be paid within two weeks. The customer complained to EWON that he did not understand how the usage had been calculated or understand why the bill was delayed for 15 months.

We contacted the embedded network retailer. The retailer confirmed that the customer had opened an account for electricity at the supply address at the time of moving in but did not open a hot water account. It said it had identified ongoing hot water usage at the supply address and sent a disconnection warning notice. When the customer did not open an account, the hot water service was disconnected. The retailer noted that there was no regulation of backbilling for a hot water service, however, as a good will gesture, it offered to provide the customer with a \$464.35 credit to the account, reducing the balance owed to \$766.31. EWON was unable to contact the customer again by phone and confirmed this outcome in writing.



### CASE STUDY

#### Customer billed for air-conditioning unit despite never having used it

A customer complained to EWON that he received a bill from his embedded network retailer that included an itemised component for the air conditioning service, even though the unit had not been switched on since he moved in. The customer checked his previous bills and found that he had been paying for air conditioning usage from the outset. He complained to the embedded network retailer and he was advised that the issue would be investigated by the meter data provider. The customer received a call from the meter data provider, but he was referred back to the retailer.

We referred the matter to the embedded network retailer for resolution at a higher level. It offered

to credit the customer's account for the disputed amounts and to disconnect the air conditioning service, but the customer returned to us when he received a new bill with further air conditioning charges.

The retailer explained that the customer was charged even though the air conditioning was not in use because it used stand by power. The retailer agreed to credit the customer's account for the air conditioning charges and to physically disconnect the service. The retailer waived the fees for the disconnection and re-issued the customer's energy bills without the air conditioning charges.



# Embedded networks

## Network interruptions for embedded network customers

Electricity customers in NSW connected to the grid have guaranteed service levels through the terms and conditions of their standard customer connection contracts and the distributor's licence conditions. However, there are no service

standards in place for NSW embedded network customers. This means there is no formal process for assessing an embedded network customer's complaint about significant interruptions to their ongoing supply of electricity.



### CASE STUDY

#### Customer was without electricity for two days due to an electricity supply outage

An advocate complained to EWON that the customer was without power for over two days due to an electricity supply outage. At the time of the outage it was extremely hot, and the customer was caring for a five-month-old baby. The apartment was on the 4th floor and the customer had to use the stairs. The customer said they had lost \$200 through food spoilage and had to spend a night in a hotel which cost \$141.

The customer complained to the retailer for her embedded network, which referred her to

the electricity distributor to make a claim for compensation. The distributor advised the customer that it would not accept a claim of compensation for the outage because she was not connected to its network, and the customer was referred back to the embedded network retailer.

We referred this matter to the embedded network retailer for resolution at a higher level, and advised the customer she could return to us if an agreed outcome could not be negotiated.

[VIEW MORE CASE STUDIES](#)

# Appendix: Case studies

Affordability, concessions and rebates	25
Embedded networks	28
Residential Parks	28
Billing	28
Water	29





# Outreach issues

## Affordability, concessions and billing

### **Customer with a cancelled payment plan is required to pay an unaffordable upfront payment provider**

A customer attended EWON's Bring Your Bills Day event in Fairfield.

The customer advised that he was on a payment plan of \$260 per month for his electricity account but had received his latest bill with an overdue balance due immediately. When the customer spoke with his retailer, he was advised to pay the full amount.

The customer wanted to reinstate his monthly payment plan because he could not afford to pay the account balance upfront.

We investigated the matter following the outreach event. The retailer advised us that the customer's payment plan was cancelled as he did not adhere to it. The retailer made efforts to contact the customer but received no response. The retailer advised that the customer not paying on time resulted in him not receiving the maximum pay-on-time discount.

The retailer proposed to resolve the complaint with the customer by offering a \$1,098.86 credit for the missed pay-on-time discounts and reinstating his \$260 per month payment plan to cover the balance. The retailer also requested the customer contact it to discuss his current contract.

The customer agreed to the resolution offer and we provided an EAPA referral.

---

### **A pensioner requests help with an unaffordable payment plan**

The customer attended EWON's Bring Your Bills Day event in Woy Woy.

The customer, a pensioner, advised EWON she was having difficulty paying her electricity account. Her retailer contacted her requesting payments of at least \$60 per week but she advised she could only afford \$60 per fortnight. She said she had received EAPA assistance in the past but was not sure of the amount.

We contacted the customer's retailer during the event. The retailer confirmed the amount of EAPA the customer received in 2018 and 2019. It agreed to put the customer on its affordability program with a payment plan of \$60 a fortnight. EWON referred the customer to Centrelink at the event, to set up a Centrepay arrangement for her electricity account.

We were also able to arrange for the customer to receive an electricity offer which was 11% lower than her current contract. We referred the customer to a community agency at the event for EAPA support.

---

### **Customer asks for support to set up an affordable payment plan**

A customer approached EWON at a bills support event in Blacktown.

The customer advised she had received a high estimated bill approximately 12 months earlier. She had been paying \$100 per fortnight via Centrepay but had now been told by her retailer that she needed to pay \$200 per fortnight, which she said she could not afford. She asked for us to help her set up an affordable payment plan with her retailer. We confirmed that she was already receiving the Low Income Household Rebate.

We contacted the customer's retailer following the event to confirm the arrears amount. We were able to arrange a payment plan for the customer of \$86.48 per fortnight, via Centrepay, starting in mid-November. This covered arrears and future consumption and would be reviewed.

EWON also gave the customer an EAPA referral. We also provided advice about providing access to her premises for meter reading purposes, as she kept dogs which may have been the cause of the estimated bill.

---



# Outreach issues

## Affordability, concessions and billing

### Customer with disconnection notice seeks help to clear account balance

A customer attended EWON's Bring Your Bills Day event in Earlwood.

The customer's advocate advised that the customer had received a disconnection notice from her retailer. The customer asked us to check the accuracy of her bill. She also wanted to confirm that her meter had been installed correctly, as she was confused about the meter following discussions with her retailer.

We discussed EAPA with the customer and advocate and referred them to an EAPA agency at the event. When we contacted the retailer it advised that a disconnection service order had not been raised.

We investigated the matter following the event. The retailer said it has made several unsuccessful attempts to contact the customer and had not had any contact with them since February 2019. The retailer also advised it had no record of a customer meter exchange request.

The retailer advised that the customer had received \$300 in EAPA. The retailer waived the remaining account balance of \$32.68 as a customer service gesture. The customer accepted the retailer's offer through their advocate.

---

### Customer's eligibility for rebates and concessions is confirmed

The customer attended EWON's Bring Your Bills Day event in Earlwood.

The customer advised us she had high bills and was concerned about the rates in her energy plan.

We confirmed the customer was receiving the appropriate discounts and rebates. The customer was referred to Service NSW at the event to compare her current energy contract with other offers using its Energy Switch comparison tool. As the customer was a pensioner – and had not received EAPA in the past – she was also able to obtain EAPA from an agency at the event.

---

### Customer not receiving rebates or discounts for her energy bills

A customer approached EWON at a Bring Your Bills Day event in Blacktown. She required a Greek interpreter.

The customer advised us she was a pensioner, but that the Low Income Household Rebate was not on her gas or electricity bills. She had also not received any discounts. She attended the event to ensure that she was receiving the appropriate rebates and discounts.

Following an EWON investigation during the event, the customer's retailer applied the Low Income Household Rebate, as well as a 14% discount on her electricity account and an 18% discount on her gas account. The customer was satisfied with this outcome.

---

### A customer seeks help with a bill she can't afford

A customer attended an EWON Bring Your Bills Day event in Earlwood.

The customer advised us she considered a recent bill unaffordable and had noticed that the Low Income Household Rebate had not been applied to it. She wanted to make sure she was receiving all rebates and discounts she was eligible for.

Our review of the customer's bill indicated that she was not receiving the Low Income Household Rebate, although she was eligible. We tried to assist the customer to get the rebate applied and backdated. Unfortunately, the customer did not know the password to her energy account as her daughter had set it up.

We advised the customer to contact her retailer again when her daughter was present. We also referred her to the EAPA agency at the event.

---



# Outreach issues

## Affordability, concessions and billing

### **Incorrect spelling of customer's name leads to rebate ending**

The customer attended a Bring Your Bills Day event in Earlwood. He required a Chinese interpreter.

The customer advised he had received a letter from his retailer stating that the Low Income Household Rebate would cease to be applied to his electricity account. The letter said this was because of the inconsistent spelling of his name on his account compared to other records. This followed cross checking with Centrelink records.

The customer asked us to have the Low Income Household Rebate reinstated. We called the retailer at the outreach event and advised the correct spelling of the customer's name. The retailer confirmed that the rebate would be reinstated and backdated to July 2019, when it was last applied.

---



# Outreach issues

## Residential parks

### **Customer not eligible for Energy Accounts Payment Assistance support because she lives in an embedded network**

A customer attended an EWON Bring Your Bills Day event in Woy Woy. She was living in a residential park and experiencing difficulties paying the electricity bill from the park operator. She owed around \$180 and wanted to know if there was any payment assistance available to her.

We informed the customer that the NSW Government's Energy Accounts Payment Assistance (EAPA) scheme does not extend to customers living in embedded networks such as residential parks. However, we identified that the customer was not receiving the Low Income Household Rebate she was eligible for. The customer was not aware of the rebate and she was referred in person to Service NSW staff at the event to apply for it.

---

### **Incorrect meter reading and rebate errors result in a high bill**

A Greek-speaking customer attended a Bring Your Bills Day event in Blacktown with his daughter acting as his advocate. He had received an electricity bill of \$392.27 which he considered high, as his bills were normally around \$120. He had spoken with the provider but had not received an explanation for the increase or any assistance.

EWON reviewed the billing and identified that the Low Income Household Rebate had not been applied in full to the customer's bills. The provider advised that this error had already been identified internally and was in the process of being corrected.

The customer provided a photograph of his electricity meter to assist with the billing review. EWON noted that while the customer's bill indicated it was based on an actual meter reading, the reading on the bill was substantially higher than what the meter showed. The provider acknowledged this error and reissued the account based on the photo provided by the customer. The rebilling and corrected rebate resulted in a credit of \$298.96.

---

### **High bill dispute and marketing confusion**

A customer attended a Bring Your Bills Day event in Woy Woy. She had received her first bill, for \$761, since transferring to her new provider and disputed the bill as high, as she lived alone in a small cabin behind a main house and did not have many appliances. She was receiving Centrelink benefits and experiencing significant payment difficulties. She was also disputing the fact that her bill included a pay on time discount as she had explicitly requested a plan without pay on time conditions or penalties, because her limited income meant she could only pay her bill in instalments.

EWON investigated the customer's complaint and found that she had agreed to an energy plan with a pay on time discount and this had been confirmed in the contract sent to her. Although no errors were identified with the billing, in the interest of resolving the complaint the provider offered to apply the missed pay on time discount of \$202.19 and waive the remaining balance of \$77.94. The provider also invited the customer to contact it to discuss alternative energy plans with guaranteed discounts introduced when the Federal Government Default Market Offer came into effect.

The customer was satisfied with the provider's offer to resolve the complaint and advised she would contact the provider to discuss a new energy plan.

---



# Outreach issues

## Residential parks

### Retailer bills customer for two separate properties

A customer attended an EWON Bring Your Bills Day event in Woy Woy. She was living in a residential park and experiencing difficulties paying the electricity bill from the park operator. She owed around \$180 and wanted to know if there was any payment assistance available to her.

We informed the customer that the NSW Government's Energy Accounts Payment Assistance (EAPA) scheme does not extend to customers living in embedded networks such as residential parks. However, we identified that the customer was not receiving the Low Income Household Rebate she was eligible for. The customer was not aware of the rebate and she was referred in person to Service NSW staff at the event to apply for it.

---

## Water

### Payment difficulties for non-account holders

A customer attended a Bring Your Bills day in Gunnedah with a water bill for a bore water licence that he was having difficulty paying. The bill was in his wife's name who had died two years earlier. However, as a pensioner he had been unable to afford the legal costs to finalise probate and transfer the property and water licence into his name.

The provider advised us that while it did not have a hardship or affordability assistance program, the customer should contact its accounts department to negotiate an affordable payment plan. The provider also suggested the customer visit the Department of Planning, Industry and Environment's Drought Hub website, as he might be entitled to assistance as a small licence holder.

We also referred the customer to a community legal service at the event to discuss legal advocacy options and he was able to secure the services of a solicitor who could assist with his legal difficulties.

---

### Customers wants to use water more efficiently

A customer attended a Bring Your Bills Day event in Blacktown to get advice about water efficiency as she believed her water usage was high and wanted to reduce it due to the drought. The customer was also seeking advice on how to read and understand her water bill.

We provided water appliance and efficiency information to the customer and advice on how to understand her water bill. We gave the customer a water efficient shower head provided by the NSW Department of Planning, Industry and Environment as part of a water efficiency program. We also referred the customer to her water provider's website for additional water efficiency information.

---

### Customer seeks help with payment difficulties

A customer attended a Bring Your Bills Day event in Bankstown as he was having difficulty paying his water bill of \$342.43. He held a Health Care Card and was unsure if he was entitled to any rebates from the water provider.

The water provider did not provide a rebate to customers with the type of Health Care Card the customers held, but we were able to refer the customer to the provider's hardship team to be assessed for its payment assistance scheme.

---



# Outreach issues

## Water

### **Customer disputes high water bill from a community housing water**

An Aboriginal customer attended a Law Week event in Brewarrina to dispute a high water bill from her community housing provider. She also raised concerns about poor customer service, as the provider would not supply her with an itemised breakdown of the water usage charges.

As the water provider was not an EWON member, we referred the customer to the Western Aboriginal Tenants Advice Advocacy Service. We also provided the customer with general information regarding water billing and invoicing requirements. The customer was satisfied with the referral as she had not been aware of the service.

---

### **Poor water quality forces customer to buy bottled water**

A customer attended a Bring Your Bills Day event in Woy Woy. She wanted to lodge a complaint about her local Council regarding the quality of the town water supply. The water was brown and she could not drink it or wash in it and had been purchasing bottled water for drinking. As a pensioner she found it difficult to pay her water bills in addition to buying bottled water.

As the Council was not an EWON member, we advised the customer to raise the issue directly with Council and advised her to contact the NSW Ombudsman if she was unable to resolve the complaint.

---