



27 October 2021

Ms Alisa Toomey  
Senior Adviser  
Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2000

Dear Ms Toomey

**EMO0040 – AEMC Review of the regulatory framework for metering services directions paper**

Thank you for the opportunity to comment on this directions paper.

The Energy & Water Ombudsman NSW (EWON) investigates and resolves complaints from customers of electricity and gas providers in NSW, and some water providers. Our comments are informed by our investigations into these complaints, and through our community outreach and stakeholder engagement activities.

We have only responded to those consultation questions that align with issues customers raise with EWON, or with our organisation's operations as they relate to this directions paper.

If you would like to discuss this matter further, please contact me or Rory Campbell, Manager Policy and Research, on (02) 8218 5266.

Yours sincerely

A handwritten signature in black ink that reads "Janine Young".

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



### AEMC Review of the regulatory framework for metering services directions paper

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Smart meters are a crucial component of a more innovative and efficient energy system that supports an evolving energy market. EWON strongly supports regulatory change that fosters a more effective rollout to better enable the existing and future benefits of smart meters.

#### Question 1: Benefits which can be enabled by smart meters

**(a) Are there other benefits which can be enabled by smart meters that are important to include in developing policy under the Review?**

The consolidated list of benefits in the directions paper that EWON and other stakeholders raised appears to be comprehensive.

**(b) What are stakeholders views on alternative devices enabling benefits? What are the pros and cons of these alternative devices?**

Smart meters realise the individual and collective benefits outlined in the directions paper, without precluding the use of alternative devices to provide complementary benefits for those customers who do have access to them.

As the AEMC noted, all customers have a meter and metering is well-regulated. Metering falls within EWON's jurisdiction, giving customers a clear path for external dispute resolution.

Alternative devices may not be affordable or accessible for all customers. For example, some customers do not have access to fast individual household internet connections required for Internet of Things (IoT) devices and home management systems. Regulation and compliance for alternative devices may create greater complexity for consumers as devices situated behind the meter fall within the customer's responsibility. Customers may also be unclear whether a complaint about an IoT energy management device operating on the 5G network should be referred to EWON, NSW Fair Trading or the Telecommunications Industry Ombudsman. We work hard with other EDR schemes on referral protocols, but confusion can occur to the customer in the first instance when they are trying to work out which entity to approach.

#### Question 2: Penetration of smart meters required to realise benefits

**(a) Do stakeholders agree that a higher penetration of smart meters is likely required to more fully realise the benefits of smart meters? If so, why? If no, why not?**

Higher penetration of smart meters is essential to allow the individual and collective benefits of smart meters to be realised, including achieving existing benefits on a wider scale and enabling future benefits. The AEMC has provided thorough reasoning for this in the directions paper based on stakeholder feedback to the previous consultation, including EWON's feedback.



### Question 3: To reach critical mass in a timely manner, options to accelerate the roll out should be considered

**(a) Do you consider that the roll out of smart meters should be accelerated? Please provide details of why or why not.**

The smart meter rollout should be accelerated for the reasons explored by the AEMC in the directions paper. The rollout to date has been piecemeal and slower than expected. As discussed in our previous submission, retailers pushed for reform and the expectation was that the smart meter rollout would be proactively led by them. Retailers have not lived up to the responsibility of the rollout for which they heavily lobbied.

**(b) What are the merits, costs and benefits of each option? Is there a particular option which would be most appropriate in providing a timely, cost effective, safe and equitable roll out of smart meters?**

#### Installation targets and/or an end-date

In our previous submission, EWON proposed that a clear end date will ensure the bulk of the rollout occurs within a reasonable timeframe and will assist in monitoring the progress of the rollout. Installation quotas or targets for retailers leading up to an end date could also achieve accelerated and measurable progress. However, as the AEMC noted, quotas or targets will only be effective if used in conjunction with other measures discussed in the directions paper to help move past some of the existing pain points hindering the rollout. Any quotas or targets should also be sufficiently nuanced to consider vulnerable customers such as those living in extremely remote regions or social housing.

#### Age-replacement

The potential efficacy of this option is difficult to assess without more information about the number of meters in NSW in particular age brackets. The directions paper indicates that this information may not be readily available. If this option is implemented, the AEMC should consider the lessons learned from the metering family failure replacement processes which are currently under review. One issue of note is how to prioritise the different drivers for meter replacement (refer to Question 10). This option would also require improved cooperation between retailers, metering parties and networks, as the processes involved in an age-replacement program would require considerable information-sharing and coordination.

#### Incentive/cost sharing options

Refer to Question 4.

### Question 4: Options to assist in aligning incentives

**(a) What are the costs and benefits of each option? Is there a particular option which would best align incentives for stakeholders?**

Regardless of which options are considered, the regulatory framework needs to consider customer experiences and therefore low trust in the energy sector. In our previous submission, EWON provided complaints information and case studies demonstrating that inefficiencies and lack of cooperation between retailers, metering parties and networks in the current framework leads to poor customer experience. Options for splitting incentives and making changes to who is responsible for metering should not make the customer experiences more confusing or difficult. Despite its issues, the current framework makes the retailer the primary point of contact for customers and provides them with a clear path for external dispute resolution via EWON. This must be maintained given the relationship between energy account data and the amount payable lies with the retailer and the customer.



The AEMC should also consider the potential for financial incentives to encourage problematic marketing practices towards customers. For example, culturally and linguistically diverse, Aboriginal and Torres Strait Islander, and elderly customers can be particularly vulnerable to misleading marketing. The AEMC could mitigate this by including provisions for information sharing before a smart meter is installed that are meaningful and goes beyond a “box-ticking” exercise (refer to Question 9).

### Question 6: Enabling appropriate access to data from meters is key to unlocking benefits for consumers and end users

**(a) Do you agree there is a need to develop a framework for power quality data access and exchange? Why or why not?**

EWON does not have complaints information that provides a basis to discuss power quality data in detail, but the directions paper makes a strong case for development of a framework that results in individual and market-wide consumer benefits from power quality data access and exchange. We also note the Newgate consumer research the AEMC commissioned as part of the review, indicates that some consumers consider smart meters being able to provide data that helps the network operate more safely and efficiently is a desirable benefit.

**(d) Do you consider the current framework is meeting consumers' demand for energy data (billing and non-billing data), and if not, what changes would be required?**

The current framework is not fully meeting consumers' demand for billing energy data due to the slower than expected rollout and the need for increased penetration (refer to Questions 1 and 2). Our previous submission provided complaints information demonstrating the provision of billing data to customers is problematic, and real-time applications are not always meeting customers' expectations for monitoring their usage. EWON supports the AEMC's decision to consider stronger obligations on the format and timeframe of how billing energy data is provided to customers, and potential provisions around real-time applications.

While EWON has complaint information for billing data, we have not received complaints which identify a basis to discuss demand for non-billing data.

### Question 9: Improving customers' experience

**(a) Do you have any feedback on the proposal to require retailers to provide information to their customers when a smart meter is being installed? Is the proposed information adequate, or should any changes be made?**

EWON strongly supports measures to require retailers to provide more information to their customers before a smart meter is installed. As explained in our previous submission, customers are not armed with sufficient information from their retailer prior to installation about important topics like potential costs, how their tariff may change and how to maximise the benefits of a smart meter.

This requirement will only be effective if the information is given in a meaningful way rather than being a “box ticking” exercise that does not actually result in customers being more empowered and knowledgeable. For example, information provided as clauses in terms and conditions is less effective than specific and targeted notice. The AEMC's suggestion that information be provided in writing prior to installation is sensible (refer to Question 11a). However, information provided in written notices must be reinforced by clear and accurate information over the phone and online in response to customer queries and complaints. Written information needs to be supported by easy English and or pictorials given that is widely recognised that over 40% of consumers have low literacy, and metering information is complex and not easily understood by consumers who do not experience this vulnerability.



### Reason for meter installation

While this is rarely the sole reason for a complaint, EWON receives complaints where customers are unhappy about not being informed of the reason for a meter exchange. This generally aligns with customers not understanding their overall rights and responsibilities with smart meters, such as whether they are able to opt out or not (refer to Question 11b). This requirement is particularly reasonable if different timeframes are applied for the reason for meter replacement. Customers should be given clear expectations of which timeframe applies to their specific circumstances (refer to Question 10a).

### Rights and responsibilities (including potential remediation work and dispute resolution options)

As detailed in EWON's previous submission, site remediation is a pain point for the smart meter rollout and can be complex. Equipping customers with upfront information about the potential complications and costs of remediation work can somewhat mitigate the issue by ensuring customers are more prepared if problems arise.

Options for internal dispute resolution and external dispute resolution are important for customers who need to understand their recourse for making a complaint. Including EWON's contact details would help customers who wish to obtain independent advice and information about smart meters (refer to Question 9b).

### Changes to market contract terms and conditions (including tariff changes)

EWON receives complaints from customers who were not aware their tariff would change following a meter exchange and were not advised if they had a choice. We have received complaints from customers who did not realise that they would move from a flat tariff to a residential demand or time of use tariff and would have preferred to have remained on a flat tariff. EWON suggests that as well as advising customers whether the tariff will change, retailers should also be required to advise them whether they have choices regarding available tariffs, what the choices are, and a contact number to discuss the choices with the retailer.

See Case Study 1 in **Attachment 1** for an example of a complaint about lack of tariff information prior to a meter exchange, where the customer's dissatisfaction may have been better managed with upfront information.

Our previous submission also noted that the Australian Energy Regulator's (AER's) network tariff reforms may create barriers that prevent retailers from offering tariff options that are tailored to the varying needs of customers. This is a serious issue for customers with very low consumption who will not benefit from cost reflective tariffs. It is important that customers understand their choices in the changing energy landscape, however limited those choices may be, particularly where there is potential cost impact.

### Summary of services available

This issue is rarely the primary driver for a complaint to EWON. However, we receive complaints from customers who consider they were not given clear information about the services that will be available to them following installation of a smart meter, such as real-time applications to help them monitor and potentially adjust their usage habits to reduce costs.

### **(b) Should an independent party provide information on smart meters for customers? If so, how should this be implemented?**

EWON provides information about smart meters to customers who contact us for independent advice or to make a complaint, but we consider that the broad, proactive provision of smart meter information including promoting the benefits of smart meters and explaining the cost implications should be industry-driven.



**(c) Should retailers be required to install a smart meter when requested by a customer, for any reason? Are there any unintended consequences which may arise from such an approach?**

EWON sees few complaints about retailers declining a customer request for a smart meter, but this requirement could be helpful for scenarios which are not covered in the current framework such as a customer with chronic meter access issues seeking a smart meter to enable remote reads. See Case Study 2 in **Attachment 1**. Like the issues with solar and new connection installations, this approach only partially addresses the problems and would need to be combined with other changes.

The AEMC should also consider aspects such as resourcing issues for smaller retailers (as regulatory imposts can create barriers to competition), what exceptions would apply, and how retailers would be required to communicate with customers if an exception applies and it is not able to fulfil a request.

### Question 10: Reducing delays in meter replacement

**(a) Do you have any feedback on the proposed changes to the meter malfunction process?**

EWON supports a review of options in this area, particularly as delays and confusion under the current framework drive billing complaints if the customer is being billed on inaccurate or estimated meter readings while awaiting a meter exchange for a faulty meter. EWON has investigated complaints involving significant delays with faulty meter replacement resulting in disputed bills in the meantime. See Case Study 3 in **Attachment 1** for an example of billing impact from a delay in replacing a faulty meter.

**(b) Are there any practicable mechanisms to address remediation issues that can prevent a smart meter from being installed?**

As detailed in our previous submission, remediation issues significantly contribute to meter installation delays and can have a high financial impact on customers. We recognise that this can be a complex issue. We support the measure discussed in Question 9 that customers be advised of these potential issues prior to meter installation attempts so they can mitigate the impact. Remediation issues highlight the need for improved cooperation between retailers, metering parties and networks to ensure remediation issues are efficiently and accurately identified, and clearly communicated to customers.

### Question 11: Measures that could support more efficient deployment of smart meters

**(a) Do you have any feedback on the proposal to reduce the number of notices for retailer-led roll outs to one?**

EWON rarely receives complaints about the number of written notices advising of an upcoming meter exchange i.e. whether there are too many or not enough. As noted in our response to Question 9, the larger issue is the quality of upfront information. If retailers are required to provide more detailed and meaningful information prior to smart meter installation, it may be reasonable to reduce the requirement to one written notice. Reducing the number of written notices is also in line with other industry practices which only require one notice, such as planned network outages. The AEMC should also consider factors such as customers in very remote regions who may experience delays receiving written notices by post.

**(b) What are your views on the opt-out provision for retailer-led roll outs? Should the opt-out provision be removed or retained, and why?**

Customers can currently request a Type 4A meter if they do not want a communications-enabled meter installed or for issues like poor mobile coverage. However, the current metering framework restricts the ability for customers to opt-out as some market offers require smart meter installation





as part of their prerequisite terms and conditions. Others involve additional fees and charges if a customer requires or wishes to have a manually read Type 4A meter.

In Case Study 1 in **Attachment 1**, the meter exchange occurred in response to a meter family failure notification. The customer would not have been able to opt out even if he had been advised ahead of time that his tariff may change from a flat tariff to a time of use tariff.

If the opt-out provision is removed completely, it reinforces the importance of clear, meaningful upfront information prior to the meter exchange as discussed in response to Question 9. This ensures customers understand what is happening and why.

**(c) Are there solutions which you consider will help to simplify and improve meter replacement in multi-occupancy premises?**

EWON provided information on this issue in our previous submission, acknowledging that it is a complex issue. The requirement to advise customers of potential remediation problems and improved cooperation between retailers, metering parties and networks is crucial to addressing this issue. The problems with multi-occupancy premises are exacerbated for social housing, bringing in an additional layer of customer vulnerability and highlighting the need to develop a rollout that is equitable and not just accelerated.

### Question 12: Feedback on other installation issues

**(a) Do you have feedback on any of the other installation issues raised by stakeholders? Are there any other installation issues the Commission should also consider?**

These additional installation issues are important to consider and are directly connected to the importance of improved communication and cooperation between retailers, metering parties and networks.

#### Process for replacing meters following a natural disaster

NSW has suffered extreme heat, storms, bushfires, and flooding in recent years. Where customers require a meter replacement following a natural disaster, clear business-to-business communication is necessary for appropriate prioritisation and to minimise customer impact. For example, identifying which customers are without power should be the highest priority and clarifying whether a job is defined as a meter replacement, or a new connection could avoid administrative delays.

#### Changes to testing and inspection processes

Customers occasionally complain about delays with testing and inspection processes such as being given conflicting information about responsible parties. This can cause significant issues, especially for customers with a smart meter where the problem is that their hot water supply is not working. See Case Study 4 in **Attachment 1**.

#### Provision of industry keys to metering parties to enable meter access

EWON has received complaints from customers living in multi-occupancy premises who have difficulty providing access for a smart meter installation due to the meter room being locked and only accessible with an industry key held by their strata/building management and the network. This can be particularly problematic for customers where the reason for the meter exchange is a faulty meter resulting in estimated billing, as they are unable to receive accurate bills until the issue is resolved. Case Study 5 in **Attachment 1** for an example of a customer living in social housing experiencing this issue. This case study again underlines the need to consider the position of vulnerable customers to ensure an equitable rollout.



### Question 13: Improvements to roles and responsibilities

**(a) Are there any changes to roles and responsibilities that the Commission should consider under this review? If so, what are those changes, and what would be the benefit of those changes?**

Retailers must be held responsible, and accept accountability, for the actions of their metering parties including meter providers, meter coordinators and meter data providers which they engage to act on their behalf.

Any changes should not create a situation where customers are confused about who can assist them or find themselves bounced between different parties. Changes to the rollout should increase accountability and clarity of responsibility. Whether the responsibilities stay the same or are changed, we reiterate that a fundamental element of accelerating the rollout is improved communication and cooperation between retailers, metering parties and networks.

**Enquiries about this submission should be directed to Janine Young, Ombudsman on (02) 8218 5256 or Rory Campbell, Manager Policy and Research, on (02) 8218 5266.**



## Case studies

### Case Study 1

**A customer agreed to a new market plan and was quoted flat tariff prices the day before his meter was replaced with a smart meter, and was not informed that his tariff would change to time of use once the smart meter was installed.**

A customer's energy plan was due to expire, so he contacted his retailer on 5 July 2021 and agreed to a new twelve-month market offer. The retailer quoted flat tariff prices. He received an email on 7 July 2021 confirming the new market offer, but then received an email on 9 July 2021 which indicated he would be charged different prices. He contacted his retailer and was advised that his meter was replaced with a smart meter on 6 July 2021 and the tariff was automatically changed to a time of use tariff. He contacted EWON as he felt the retailer had misled him when he agreed to the market plan on 5 July 2021 by not explaining what would happen when his meter was exchanged the following day. He also thought his retailer should have given him a choice about what would happen with the tariff. He wanted the retailer to honour the flat tariff prices he agreed to.

EWON initially referred the complaint back to the retailer at a higher level, but the customer returned advising that the retailer was unable to resolve the complaint.

EWON spoke to the retailer and it confirmed that the meter was replaced due to a family failure notification. When the retailer initially provided the market offer quote, the tariff was still a flat tariff. It was updated to a time of use tariff when the smart meter was installed on 6 July 2021, in line with network's guidelines in the customer's area. The customer had agreed to flat rate prices that were 15% off the reference price, and the retailer confirmed his time of use prices would still be 15% off the relevant reference price. While the retailer was not obligated to advise the customer of the tariff change prior to the smart meter installation, it acknowledged that it was unfortunate timing and poor customer experience. The retailer considered the customer may be better off on time of use rates, but that it could submit a request to the network to change it back to a flat rate with no guarantee the network would approve it. The retailer also offered a customer service credit of \$200.

The customer confirmed that he would prefer to be charged at a flat rate if possible, and the retailer submitted a change request to the network. The customer agreed to follow up directly with the retailer regarding the status of the tariff change request, acknowledging that he may have to remain on a time of use tariff depending on the network's response. The customer accepted the resolution.

### Case Study 2

**A customer's retailer declined to install a smart meter to help her avoid estimated meter reads.**

A customer contacted her retailer to request a smart meter. She was receiving estimated meter readings for her business electricity account and wanted to install a smart meter to be billed on actual meter readings. However, her retailer declined to install a smart meter. The customer contacted EWON to find out whether the retailer was obligated to install a smart meter and what her options were.



EWON explained the retailer was not required to install a smart meter at a customer's request. We referred the customer to Energy Made Easy to research other retailers in her area and see if any retailer would offer a smart meter if she transferred the billing rights for her supply address.

### Case Study 3

#### **A customer disputed estimated bills received while waiting for a faulty meter to be replaced.**

A customer received an estimated electricity bill for the period 22 August 2020 to 18 November 2020 which she considered to be high. Her retailer advised her that the meter was faulty and needed to be replaced. It took seven months for the meter to be replaced and the customer received estimated bills in the meantime. The meter was eventually replaced in June 2021 and the retailer advised it would review her previous bills in comparison to usage on the new meter. The customer was unhappy with the retailer's review as she considered her usage from June 2021 onwards would be higher than her usage from late 2020 to June 2021 as she had used more energy at home due to being at home because of COVID-19 restrictions. The balance had accumulated to \$2,971.

EWON initially referred the complaint back to the retailer at a higher level, but the customer returned advising that the retailer was unable to resolve the complaint.

The customer's retailer advised EWON that it received a meter fault notification in November 2020 as the meter was damaged. The customer's meter readings had been estimated since August 2020 for this reason. There had been delays replacing the meter due to technician availability and, on one occasion, inclement weather. EWON's review of the billing identified that the estimated readings since the last actual read on 22 August 2020 were based on historical consumption. We advised the customer that this was a reasonable basis for estimation and there was not a requirement to adjust the estimated usage in comparison to usage on the new meter. The customer was happy with this given she considered recent usage would be higher. EWON's review identified that the usage for the first estimated period 22 August 2020 to 18 November 2020 was based on usage in the preceding period rather than same time the previous year as that period had been estimated. While this was a reasonable, the retailer agreed to make a resolution offer covering the difference in usage for the period 22 August 2020 to 18 November 2020 when comparing the same period the year before rather than the preceding period, which equated to \$586. The retailer made a resolution offer of \$750 which covered this difference of \$586 plus a customer service credit of \$164 for the delay in replacing the meter from November 2020 to June 2021. The customer accepted this outcome and agreed to contact the retailer to discuss a payment arrangement for the reduced balance of \$2,222.

### Case Study 4

#### **A customer was without hot water for several weeks, it was unclear why the hot water had stopped working and there was a delay in the metering coordinator attending the premises to help eliminate possible causes.**

A customer moved into a property in early May 2021 and established an account with his preferred retailer. A few weeks after moving in, he suddenly lost hot water supply. He engaged a hot water system specialist who advised that there were no issues with the hot water system. A field officer from the network also attended on 26 May 2021 but advised it could not check the electricity meter as it was a smart meter owned by a retailer. When he then contacted his retailer, he was advised he was still in the cooling off period and therefore it could not take any action as the meter was owned by the current retailer. After the cooling off period ended, he contacted his



retailer again and it advised that the transfer had still not taken place and it was unsure how to assist him. The customer contacted EWON as he had been without hot water for a week and was unsure what to do.

EWON contacted the retailer and it advised that the transfer completed on 27 May 2021, and it had been unable to assist before that. The previous retailer had installed the smart meter in December 2020 and that retailer used a different metering coordinator to the current retailer. The retailer contacted its metering coordinator and asked it to attend the premises as the issue was a high priority. After several emails were exchanged, the metering coordinator advised it would attend on 16 June 2021 to exchange the smart meter and verify whether hot water system was correctly connected to the meter. EWON asked the retailer to escalate the request, but in the meantime the customer spoke to the metering coordinator directly and was able to bring the job forward to 7 June 2021. The metering coordinator exchanged the smart meter but the customer still did not have hot water. The customer then engaged an electrician who fixed a circuit breaker and the hot water issues was resolved.

While the issue was ultimately the customer's responsibility, poor communication and confusion between the network, retailer and metering coordinator contributed to a delay in identifying exactly where the issue lay. This was exacerbated by the close timing of the transfer to the current retailer and the fact that the previous and current retailers used different metering coordinators. The retailer and metering coordinator acknowledged that the meter should have been inspected more quickly given the urgency of the customer being without hot water. In recognition, it offered a customer service credit of \$100 which the customer accepted as resolution to the complaint.

### Case Study 5

**A customer living in a social housing unit was unable to have a faulty meter replaced with a smart meter due to access issues.**

A customer moved into a unit in October 2020 and opened an account with his preferred retailer. He then received his first electricity bill in March 2021, which was \$450 based on an estimated meter read. He contacted his retailer as he did not believe the bill was an accurate reflection of his usage. His retailer advised that the meter had been identified as faulty in November 2020 and needed replacement. However, the meter replacement had not been completed due to access issues. He advised his retailer that residents did not have access to the meter room, and he was unable to provide access, but there was an industry lock in place. His retailer referred him to the network multiple times to raise the issue instead of discussing options with him. He contacted EWON because the retailer had been unable to resolve his complaint and he was not able to arrange access himself. EWON considered the customer to be vulnerable as he lived in social housing, received a government pension, and English was his second language.

EWON spoke to the retailer and it confirmed that it received a meter fault notification for the customer's meter on 22 October 2020 due to a meter malfunction. The retailer tried to arrange for the meter to be replaced with a smart meter, but the metering coordinator could not gain access to the locked meter room. The retailer confirmed the customer's bill was estimated due to the meter malfunction, and he would continue to receive estimated bills until the meter was replaced. He would also be unable to change retailers as an actual read could not be obtained to allow a transfer.



EWON discussed the matter further with the retailer and the network, and the retailer facilitated cooperation between the metering coordinator and the network. However, the network then provided information that when it had last attended the property, the industry lock was damaged and could not be opened with the industry key anyway.

EWON advised the customer that there was no obligation on the network to cooperate with metering coordinators to provide keys for industry locks. We advised that the regulations place the onus on the customer to provide meter access. We acknowledged that this was causing practical difficulties and frustration in situations like his where he is a tenant and access involves social housing building management. We advised it would be reasonable for the social housing building management to facilitate access to allow him to have the meter replaced and receive accurate bills. We noted the additional complication of the network's advice that the lock was damaged, which was the social housing building management's responsibility to replace.

The customer advised that he had contacted social housing but did not receive assistance. He was willing to engage a locksmith himself, however this was not possible given his status as a tenant in the social housing property. We provided him with referrals for advice about working with social housing to address the issues with the industry lock and allow access for the meter exchange. We referred the customer to discuss payment options with the retailer, noting that although he disputed the bill, estimated bills are payable and it would be reasonable to make some affordable payments toward the bill. As it was only the customer's first bill, the retailer would be able to offer flexible payment options while waiting for the meter replacement to take place. We advised the customer to return to EWON if required further assistance, such as if he had concerns about the billing once the meter was exchanged and the retailer had the opportunity to further review the disputed billing. We also provided referrals for community assistance.