Energy & Water Ombudsman NSW
Free, fair and independent

27 September 2024

Ms Carmel Donnelly
Chair
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240

Dear Ms Donnelly

Monitoring the Retail Electricity and Gas markets in NSW – Consultation Paper

Thank you for the opportunity to comment on IPART's consultation 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 questions in the consultation paper that align with issues customers raise with EWON, or with our organisation's operations as they relate to this review.

If you would like to discuss this further, please contact [redacted]

Yours sincerely

[redacted]

Janine Young
Ombudsman
Energy & Water Ombudsman NSW

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Monitoring the Retail Electricity and Gas Markets in NSW

Key issues for IPART to consider for inclusion in its FY24 Monitoring Report

Key issue 1: the consumer challenges associated with cost-reflective electricity tariffs are a shared problem and there must be a shared solution

- EWON recognises that energy retailers are making tariff decisions because energy networks are changing to cost reflective tariffs (demand and time of use) and therefore energy retailers need to either absorb extra costs or pass them on to their customers.
- However, when they are passed on to customers, the shift towards cost-reflective electricity tariffs is causing customer confusion especially as it very often results in increased energy bills.
- Addressing information complexity and lack of alignment between tariffs assigned to consumers and their energy usage is a shared and growing problem which both energy networks and retailers should address.

Key issue 2: complaints about virtual power plants and battery storage are driven by new consumer issues and an adequate framework for redress must be in place

- Complaints about VPPs and battery storage complex because these complaints often involve the sale and installation of devices which are bundled together with VPP energy retail contracts.
- EWON has been advocating for a review of the consumer protection framework to include equal protections for consumers taking up CER products and services regardless of whether they purchase CER from energy retailers or other entities. The consumer journey for complaints about CER is fragmented and the outcomes for consumer disputes are inconsistent and unequitable ie EWON can redress complaints involving its members – Fair Trading does not have the same powers for CER products retailed / installed by non-AER authorised energy entities.
- Failure to implement a fit for purpose system of redress, or for regulators to require all CER retailers / entities to obtain authorisation and become EWON members, will increasingly impact on consumer trust in the energy sector and in incentive schemes like the Peak Demand Reduction Scheme.
- The recently released NSW Consumer Energy Strategy includes a commitment to begin public consultation to expand EWON's jurisdiction to new energy services providers, such as VPPs and demand response services. EWON welcomes this initiative and will be a strong participant when the process begins in 2025.

Key issue 3: the emerging issues that EWON recommends IPART explore in this report, includes:

- Ceasing door to door and telesales marketing relating to energy products and services including CER.
- Improving the consumer experience related to demand response programs, such as controlled load hot water systems.
- Making mandatory offering all options by energy retailers to their customers seeking the removal of gas services at their homes, or for tenants, at their rental property.

Consultation question 1: For the matters we are required to report on, are there additional metrics that we should consider for our 2023-24 report?

We are not positioned to provide further input about additional metrics that IPART should consider for its FY24 report.

Consultation question 2a: How are changing electricity pricing structures, including time of use and demand tariffs, impacting households and small businesses?

Complaints to EWON about electricity tariffs have increased in 2024. Our review of complaints indicates this is driven by increased complexity in the energy market caused by the shift towards cost-reflective electricity tariffs as part of the 2024-2029 Regulatory Resets, and retailers changing retail energy plans due to these new tariffs.

The energy transition is calling on energy consumers to acquire more energy knowledge than ever before so that consumers can work out how to choose the most beneficial and available retail energy plans. This is wrong – it is incumbent on energy retailers to engage with their customers and provide them with the most beneficial plans that suit consumer usage consumption and usage patterns. Complaints to EWON indicate that retailers are not providing accessible and easy to understand information to energy consumers before retailers change their electricity tariff. It is clear that more needs to be done by retailers to engage with their customers about cost-reflective tariffs before retailers change energy plans or tariff structures.

EWON recognises that energy retailers are making tariff decisions in light of the fact that energy networks are changing to cost reflective tariffs (demand and time of use) and therefore energy retailers need to either absorb extra costs or pass them on to their customers.

Therefore, addressing information complexity and lack of alignment between tariffs assigned to consumers and their energy usage should be a shared dilemma which both energy networks and retailers are required to address.

Until this occurs, consumers will continue to face significant barriers even when they proactively try to engage effectively with the energy market ie complex information, lack of information, misalignment of tariffs will make getting the deal that best consumer needs too challenging. If unaddressed, this will become an even greater problem with an accelerated roll out of smart meters.

Consultation question 2b: What datasets are available to assist us in understanding the impact of these pricing structures on consumers?

We are not positioned to provide further input about additional metrics that IPART should consider for its FY24 report.

Consultation question 3: What additional information would assist household and small business customers in engaging with and responding to changing tariff structures, including time of use and demand tariffs?

Customers electricity network tariffs most often change when a customer's basic meter[1] is replaced by a smart meter.[2] It is an energy retailer's responsibility to advise customers if this change in network tariff also results in changes to their retail energy plan.

We most commonly see complaints about changing tariffs structures when:

- customers not being advised that a new electricity meter installation will also lead to a change in their electricity tariff.
- energy retailers providing their customers with insufficient information about tariff changes or how consumers can benefit from time of use tariffs or demand tariffs.
- customers are confused about the difference between a network tariff and their retail energy plan, or about the relationship between these two sets of charges.

These are not new issues. However, we have seen an increased number of tariff related complaints following the changes to the NSW electricity network tariff structure statements that commenced on 1 July 2024. Refer to case studies 1 and 2 for examples of customers being impacted by unexpected tariff changes following a new meter installation.

The AEMC is currently considering the Accelerating Smart Meter Deployment rule change which will require the retailer to give "an estimate of what the customer's historical bill would have been under the new varied retail tariff structure, compared to the bill they received under their existing tariff".

EWON is supportive of this proposal as it would provide transparent and upfront information to customers allowing them to make informed decisions about how they use their energy, in turn increasing consumer confidence and trust in the energy sector. We suggest that IPART have regard to those proposals given that they may not come to fruition via the AEMC consultation process.

Consultation question 4: Are new tariff structures, including time of use and demand tariffs, creating barriers for customers switching electricity plans or retailers? If so, what are the barriers?

A lack of accessible consumer information about cost-reflective electricity tariffs is a barrier to customers effectively engaging in the energy market through switching.

Our case studies 3 and 4 provide an illustration of new cost-reflective network tariffs, and how energy retailers design their energy plans around them, and the confusion they cause customers trying to switch to a better offer.

A change in network tariff can also make it more difficult for an energy consumer to look for a better offer on websites such as the Australian Energy Regulator's energymadeeasy.gov.au website.

For example, when using energymadeeasy.gov.au:

- supplying a National Meter Identifier (NMI) usually identifies whether the customer has a smart meter, but does not provide information on their particular network's tariff, so the search results may show a default time of use tariff not actually available to that customer.
- A customer on a demand tariff (assuming that they know that they are looking for a demand tariff) has to use filters to find appropriate plans, but the filters are not easy to locate.

[1] Type 5 & 6 meters – Chapter 7, *National Electricity Rules* (NER)

[2] Type 4 & 4A meters – Chapter 7, NER

- Customers have the option of clicking on a tab that shows available flat tariffs even if they are not available to that customer.

These issues result in customers choosing a preferred retail energy offer only to be sent a different contract from their retailer after they have transferred. Some retailers do not provide the customer with a reason why the contract is different, and the onus is usually placed on the customer to make a complaint. Refer to case studies 7 to 9 for examples.

The impact of all barriers to switching may result in a further reduction in the number of energy consumers engaging in the energy market.

Consultation question 5: What information is available to help IPART understanding virtual power plant programs in NSW including:

a. which retailers are offering virtual power plant programs
b. customer numbers in virtual power plant programs
c. the benefits of participating in virtual power plant programs
d. eligibility criteria for virtual power plan programs

We are not positioned to provide input about the available programs. Energy retailers will be able to provide this information. Having clear information available to consumers about the design and operation of energy retailers' varying VPP products and services would make it easier for consumers to take up this products and services.

Consultation question 6: What has been the experience of households and small businesses who have joined or participated in virtual power plant programs?

Key energy complaint trends related to VPPs and battery storage

The key complaint trends we see related to virtual power plants, household battery storage, and demand-response programs, include:

- lack of knowledge about the operation of retailer VPPs and customers complaining that they cannot determine if they are benefiting from their participation in these programs.
- complaints about unclear / complex terms and conditions in retail energy contracts that include VPP participation (see case study 7)
- billing disputes.
- unclear / misleading marketing by energy retailers relating to the sale of battery storage systems bundled together with retail energy contracts (including VPPs).
- a lack of explicit informed consent for customer participating in VPPs.
- problems with interoperability, such as, delays joining retailer VPPs due to the customer's brand/model of battery or inverter.
- customers complaining about a lack of access to energy data related to their participation in the VPP.

The challenge presented by the increased uptake of CER are the limits it has placed on the effectiveness of external dispute resolution (EDR). Effective EDR is critical for maintaining consumer trust in our essential energy services, and also a key mechanism for identifying what is not working for consumers. Access to free, fair and independent EDR therefore must keep pace with evolving energy technologies and business models. The two tiered approach in place now ie Fair Trading for those customers not purchasing CER products and services from authorised energy retailers, and EWON for those customers who purchase from authorised energy retailers, creates an unlevel playing field for both customers and energy retailers.

EWON's analysis of complaints about battery storage identified that about three quarters of the complaints were from customers that had purchased battery storage from a third-party (not an energy retailer). EWON's EDR model is based on service providers being members of our scheme. We cannot deal with complaints about third party sales and installation, but can assist all customers with their retail billing issues. Where customers have purchased systems directly from an energy retailer, but the energy providers structure their business so that energy and CER services are provided by different legal entities, EWON cannot always address the part of a customer's complaint that involves the sale of devices and the services behind the meter – even if these services have been provided together with retail services under a single energy brand.

EWON has been advocating for a review of the consumer protection framework for consumers using CER. We believe the consumer journey for complaints about CER should be improved so that it is consistent so that outcomes to consumer disputes are fair and equitable.

The recently released NSW Consumer Energy Strategy includes a commitment to begin public consultation to expand EWON's jurisdiction to new energy services providers, such as VPPs and demand response services.[3] We will play a key role in taking this forward in 2025.

Ineffective consumer redress could impact on key energy transition projects such as the Peal Demand Reduction Scheme

The Peak Demand Reduction Scheme (PDRS) Amendment Rule published on the 6 September 2024 introduced new incentives for households and small businesses to install and operate residential batteries. These incentives are aimed at:

- the installation of new behind-the-meter battery energy storage, and
- participation in VPPs to allow partial dispatch of household batteries when it is needed to support the grid.

If these new incentives drive an increased uptake in residential batteries, we anticipate that this may also result in an increase of electricity complaints involving battery storage and virtual power plants. It is critical that customers are provided with adequate avenues for redress when things go wrong with programs like the PDRS to maintain consumer trust in these incentives.

Consultation question 7: Are there emerging issues in the NSW retail electricity and gas markets that IPART should explore as part of our Energy Market Monitoring report?

Door to door marketing relating to CER

The Ombudsman has recently written to the Minister for Energy to call on a ban of unsolicited door to door marketing and telesales for energy products and services in NSW.[4]

Following enforcement action by the ACCC in 2012-13, the withdrawal of the three biggest retailers from door-to-door marketing had a significant impact on reducing consumer detriment and complaints to EWON. The door-to-door marketing complaints we still receive are frequently linked to the sale of CER, such as rooftop solar and batteries – see case study 13.

[3] Action 25 - NSW Consumer Energy Strategy | Powering our people and communities

[4] https://www.ewon.com.au/page/publications-and-submissions/reports/EWON-Insights/ewon-insights-apr-jun-2024

The conduct of marketing companies in the future could impact on consumer trust in incentives such as the PDRS. On this basis, Victoria has progressively restricted door to door sales and telesales related to electricity, by banning:

- door to door sales for solar businesses participating in Victoria's Solar Homes programs from 1 September 2021
- accredited providers and program participants in the Victorian Energy Upgrades program from using telemarketing to market energy efficient products or services from 1 May 2024 – with a ban on door-to-door methods to take effect on 1 August 2024.

We recommend that the NSW Government consider implementing measures similar to Victoria to ensure that the reputation of schemes like the PDRS are not impacted by the marketing conduct of some providers.

Complaints about demand response programs such as controlled load hot water systems
In July 2024 EWON reported on a review of recent complaints driven by changes made by networks and retailers to controlled load services, such as hot water.[5]

Electricity networks are increasingly shifting the operation of controlled load services to help consumers make better use of the daylight hours when solar energy is being generated. For example, it is common for controlled load appliances to be turned on at night, such as between the hours of 10pm to 7am weeknights. This is now changing for some customers as networks are turning appliances on to boost them during the day.

These changes are allowing electricity networks to balance out the demand and supply across the grid to accommodate a greater share of energy being produced by renewables. However, customers have complained to EWON that they are running out of hot water, concerns that their electricity bills will increase due to their systems heating at different times, and not being told about the changes. Some customers have incurred unnecessary costs, such as paying for electricians to check their appliances, when they were not provided with adequate information on these changes. This would indicate that more information needs to be available to consumers, particularly from their retailers, as services adjust to the energy transition.

Energy retailers are also managing their own demand response programs around controlled load appliances.

Case studies 11 and 12 relate to a VPP operated by an energy retailer to control hot water services. The VPP is aimed at helping consumers use more of their energy at times of excess solar or wind generation. Customers are eligible for participation if they have a current retail contract, a smart meter, and a controlled load hot water service. Customers consent to participate in the VPP when agreeing to the terms and conditions in the standard market contract for that retailer's energy plan, but they can also opt out. The two case studies show that:

- customers who come to EWON to complain about high bills and/or the operation of their controlled load hot water service only find out they are participating in a VPP when EWON investigates
- the operation of the VPP may not be benefiting customers with underfloor heating, solar hot water, or pool pumps.

[5] https://www.ewon.com.au/content/Document/Publications%20and%20submissions/Submissions/2024/Energy%20%26%20Water%20Ombudsman%20Submission%20Unlocking%20CER%20benefits%20through%20flexible%20trading%20April%202024_0.pdf

The options for removing gas services at a property

IPART may wish to consider the issue of whether energy providers should be required to provide energy customers with all available options available for disconnecting from the gas network.

EWON receives some complaints from consumers about the high costs associated with disconnecting the supply of gas to a home - see case studies 14 and 15 for examples.

While EWON does not investigate the setting of prices, we can provide consumers with information regarding the cost and processes involved in disconnecting from the gas network. Jemena Gas Networks provides customers with two options:

- *Meter abolishment* involves removing the meter and gas service permanently. The cost of abolishment is currently $1,617 including GST.
- *Meter disconnection* involves restricting the gas supply, then the retailer reading the gas meter quarterly - provided there is no usage recorded by the gas meter, Jemena will not send network charges to the responsible energy retailer, but the retailer still needs to continue reading the meter. The cost of disconnection is $157.30 including GST.[6]

EWON recently received a complaint from a customer in which a large retailer advised that it only offered the option of meter abolishment (at the higher cost) and would not provide a disconnection service (the lower cost).

The NSW Consumer Energy Strategy includes a commitment to set new targets to increase uptake of key technologies, boost energy efficiency, increase compliance with critical safety standards and increase uptake of electrification for 2035 and 2050.[7] As more households choose to electrify, a growing number of customers will want to make informed choices about how to disconnect from the gas network. If retailers make a business decision not to provide meter abolishment, customers may be dissuaded from electrification.

[6] https://www.jemena.com.au/gas/existing-connections/abolishmentdisconnection/

[7] NSW Consumer Energy Strategy, p27

Appendix A - Case studies

Customers impacted by meter exchange and unexpected tariff changes

Case Study 1: Customer experienced a change to tariff after agreeing to a free meter upgrade

A customer agreed to a free meter upgrade by his electricity retailer and was advised that there would be no costs associated with it or any changes to his tariff. He received a rate rise notification from his retailer and researched transferring to a different retailer. He was advised by a prospective retailer that the tariff type had been changed on the national meter database from a single flat rate tariff to a demand tariff. He considers that this was without his knowledge or informed consent. He contacted his electricity retailer and requested that it rectify the error however it declined and advised that he could not go back to a single rate tariff now that the meter had been changed. The retailer offered to apply a $300 customer service gesture to his account in recognition of the poor customer service that the customer had experienced.

Case Study 2: Customer installed solar and had a meter exchange, and was advised that his tariff 'may' change

A customer installed solar panels at their property in March 2023 and a new meter was installed on 11 May 2023. He was previously on a flat rate tariff and wanted to continue on this, however he received an email from his electricity retailer on 20 May 2023 to advise that his plan was changing to a time of use tariff. He contacted the retailer and advised that he was not informed of the change to his tariff structure. It advised him that the tariff was not set by it, and it would need to apply to the local distributor to change the tariff back. The next day he received a text message from the retailer to advise that the distributor had declined to change the tariff back to a flat rate and it would remain on time of use. The customer contacted his local distributor on two occasions, and it advised that it does not set the billing structure, that the retailer are the ones that determine the rate and structure of how a customer is billed. He contacted his electricity retailer again, and it advised that the meter data provider that installed the meter would not allow the flat rate tariff to be used. He considers that he was only advised that the tariff may change, and that the electricity retailer and their meter data provider know that a flat rate tariff is not possible after a meter exchange, that he should have been informed of this before the meter was exchanged

Plans not available after customer signs up to offer

Case Study 3: Customer signed up for a flat tariff however it was not available to him once he had transferred

The customer contacted a retailer in April 2024 to sign up to a flat tariff plan that was advertised on its website. He was offered a different plan with higher rates and demand charges. He was confused by the information the retailer gave about why he could not sign up to the flat tariff plan. The retailer indicated that the flat tariff plan was not available to new customers and was "locked" to the people already on it. The retailer also indicated that its availability was restricted by the network. The matter was referred to a senior team at the retailer in the first instance.

Case Study 4: Customer wanted a flat tariff, and retailer provided incorrect information that he could request one once the transfer was completed

The customer researched retailers online to choose a new energy plan in June 2024. He found a plan he liked which was based on a flat tariff. When he contacted the retailer, the retailer said he would have to sign up to a plan based on a time of use tariff first but could later switch to a flat tariff plan once he was their customer. After he had transferred to the retailer, he rang them to change to the flat tariff plan. The retailer advised that he was given incorrect information when he

was told he would be able to change to the flat tariff plan. The matter was referred to a senior team at the retailer in the first instance.

Case Study 6: Customer signed up to a flat tariff to later discover high bills due to demand charges

The customer signed up to an electricity retailer's solar program as he understood that it offered a flat rate of $0.30 per kWh. When he checked on his account, he discovered that the demand tariffs were not correct, and that the website did not mention any demand tariff on his plan. He reviewed his bills and calculated from 18 July 2024 to 31 March 2024 that he had been charged $541.60 in demand tariff's. He contacted his electricity retailer, and it advised that during peak periods the charges include an additional tariff, resulting in a total rate of $0.68 per kWh, which is more than double what he had agreed to. His retailer offered him a $200 customer service gesture, however he considered this to be insufficient.

Inadequate information provided to customers about how the network tariff impacts on the available retail offers

Case Study 7: Customer unable to go back to flat tariff due to incorrect information from retailer that he relied on to transfer to it

The customer has a smart meter and was with retailer A which billed him on a flat rate for his electricity consumption. He contacted retailer B and was offered a flat rate. He accepted the offer and arranged to transfer to retailer B, however it then contacted him to advise that he would be billed on a time of use tariff. He disputed this with retailer B, however, was advised that it was the only option for the meter installed at his property. The customer reviewed the distributor's website and noted that it said that he could choose whether he be on a time of use tariff and further research on government websites state that "If you have a smart meter, you can stay on a flat rate". The customer raised this with retailer A however it told him that they can't take back the billing rights to the property until the 10-day cooling off period had passed and that it could not put him back on a flat rate because the account was closed, and they no longer offered this.

Case Study 8: Customer wanted to be billed on a flat tariff, however this was not available to her after meter exchange

A customer contacted her electricity retailer and requested for her meter to be exchanged. The retailer arranged for this to occur and sent her a notification that her rates might be changed after the new meter is installed. When she received her first bill, it was on time of use rates, which she considers was not clearly explained to her. She requested that her account be billed on flat rates, however it advised her that it was not possible as the distributor determines the tariff at the property, however when she contacted the distributor, it advised her that retailers can charge customers under a different rate or request that the tariff be changed.

Case Study 9: Customer was charged for requesting to change her tariff from a demand tariff to a time of use tariff

The customer installed solar panels at the supply address and when the smart meter was installed, the tariff was changed to a demand tariff. She contacted her electricity retailer as she wanted to change to a time of use tariff, however it advised her that she would need to pay $200 to have the tariff changed, which she considered to be unreasonable.

VPPs, batteries and VPPs

Case study 10: A customer faces paying a large exit fee from his energy contract due to the registration of a life support device.

A customer agreed to a retail energy plan that bundled together the retail contract, the installation of a rooftop solar system with battery storage, a power purchase agreement, and participation in a VPP. The plan provided for installation of the CER at no upfront cost and transfer of ownership for the system would transfer to the customer after seven years. He noted that since agreeing to the plan he has received a health diagnosis that requires use of life support equipment. The customer called his energy retailer to register the life support equipment, and he was told that his bundled energy plan would have to be cancelled. He was referred to the terms and conditions for his energy plan which advised that customers with life support equipment were not eligible. His removal from the bundled energy plan would mean that he was facing an exit fee of approximately $10,000. The customer had complained to his retailer about the situation he was in but had not yet had a response.

EWON provided the customer with advice about the retailer's internal dispute resolution process and recommended that he allow time for the retailer to respond to the complaint. EWON invited the customer to return if the complaint remained unresolved after speaking to the retailer again.

Case study 11: Customer experiences a loss of hot water after connection to the retailer's VPP.

A customer's meter was upgraded to a smart meter at the end of August 2023. The customer complained that since this time they were running out of hot water around late afternoon. She did shift work and therefore it was important for her to have access to hot water at nighttime. The customer made a complaint to their retailer and was advised that it would cost $200 to have their electricity meter checked. She considered they did not have any issues in the past and the retailer should fix the problem without charging a fee.

EWON checked the national metering database and advised the customer that their hot water appeared to be connected to a controlled load circuit which was controlled by their network. EWON provided the customer with information on the operation of the network's controlled load service. EWON also contacted the retailer to obtain information about the billing of the controlled load account.

The retailer advised EWON that it had taken over the customer's hot water controlled load service through its VPP after the smart meter was installed. Through the VPP the retailer controlled the times that the hot water system could heat up. Initially the retailer advised that the controlled load appeared to be heating at random times that were outside the network's defined hours for controlled load. Later the retailer advised by email that the VPP was programmed to emulate the network's timing until they had a profile of the customer's hot water usage. The retailer made adjustments to the VPP program to boost the customer's hot water usage to ensure she would have hot water at the time she needed it. The retailer offered to apply a customer service credit of $200 for the inconvenience.

Case study 12: Customer complaint involves a rooftop solar installation and a VPP focused on the controlled load hot water system

A customer purchased a rooftop solar system directly from their energy retailer. The customer stated that they had spent approximately $20,000. After the installation was complete, the customer made multiple high bill complaints, as his energy costs had increased on a quarterly basis, rather than reducing with the benefit of solar. The complaint was escalated to EWON

because the customer was dissatisfied with the retailer's response to his high bill complaints. EWON referred the matter to a specialist team at the retailer in the first instance. The complaint returned to EWON as it remained unresolved.

EWON's review of billing information and meter data found that the billing was accurate based on the data. The EWON investigation also revealed that the customer's controlled load electricity supply was now being managed through the retailer's VPP. The customer was receiving a $20 credit each month for participation in the VPP. This means the retailer had taken over the customer's controlled load service and was focused on shifting the customer's energy consumption to times of the day when there is excess solar generated power being feed into the grid. The customer was sent a letter advising them that their controlled load hot water was now being managed by the retailer rather than the network. The letter advised the customer to email the retailer if they had other services connected to the controlled load. The customer had not investigated this issue. The customer was prompted by the EWON investigation to check their installation and was advised by an electrician that their pool pump was also connected to the controlled load circuit. The customer had assumed that their hot water/pool pump usage was being offset by the energy generated by newly installed rooftop solar system.

EWON advised the customer that they had been billed correctly based on the meter data provided, and that the retailer had offered a $200 credit as a goodwill gesture. The customer did not respond to the retailer's offer. EWON made no assessment of whether the customer was financially disadvantaged by their participation in the VPP due to the fact that the retailer was unaware of the pool pump connected to the controlled load circuit – or from the advice the customer had received from the retailer about the installation of the solar system.

Door to door and telemarketing of CER

Case study 13: door to door and telemarketing of CER

A customer contacted EWON to complain about the sales tactics used by an energy retailer in her local area. On one occasion he obtained a quote from the energy retailer's door to door marketer for a rooftop solar system. He decided not to go ahead with the quote, so he rang the energy retailer and asked them not to return. Since this time, he has continued to have representatives of the retailer knock on his door and he has been receiving phone calls and text messages almost on a daily basis.

The customer had complained directly to the retailer, but the issue remained unresolved. He had also registered his number on the do not call register and made a complaint through that website.

EWON referred the matter to a specialist team at the energy retailer in the first instance.

Gas disconnections

Case Study 14: Customer thought that the cost of removing a meter should not be a customer's responsibility

The customer advised that he recently purchased a property that has a gas connection. The customer wanted the gas assets to be removed and that his retailer had advised him this would cost over $1000. The customer was of the view that he did not own the meter and gas lines and therefore he should not have to pay to have them removed.

Case Study 15: Customer dissatisfied with cost of meter abolishment

The customer advised she had requested that the meter at the property be removed for the purpose of renovating the property. The customer was quoted $1,151.70 to remove the meter, which she considered was not reasonable for the amount of work and time required, and was significantly higher than other states.