

# **Guidelines of Good Practice on Price Comparison Tools**

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## INFORMATION PAGE

### Abstract

On 25 October 2011, CEER launched a public consultation on its Draft advice on Price Comparison Tools (C11-CEM-45-5). The document outlined a number of proposals to make improvements on the implementation and quality of price comparison tools.

This document presents the final 14 recommendations for price comparison tools which cover the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correct and accurate, user-friendliness, accessibility and customer empowerment.

These final recommendations are being made to Member States, NRAs, public bodies, customer organisations, PCT providers and energy suppliers.

### Target Audience

Energy suppliers, traders, those that both generate and consume electricity, electricity customers, electricity industry, customer representative groups, network operators, Member States, academics and other interested parties.

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### Related Documents

CEER/ERGEG documents

- Draft Advice on Price Comparison Tools - A CEER Public Consultation Paper, CEER, October 2011, C11-CEM-45-05, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/CUSTOMERS/Price%20Comparison%20tools/Consultation\\_Documents/C11-CEM-45-05\\_Draft-advice-Price-Comparison-Tools\\_11-10-2011.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/CUSTOMERS/Price%20Comparison%20tools/Consultation_Documents/C11-CEM-45-05_Draft-advice-Price-Comparison-Tools_11-10-2011.pdf)
- Price Comparison Tools: case studies. Annex 1 to CEER draft advice on Price Comparison Tools, CEER, October 2011, C11-CEM-45-05a, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/CUSTOMERS/Price%20Comparison%20tools/Consultation\\_Documents/C11-CEM-45-05a\\_Case\\_studies\\_PCT\\_11-Oct-2011bis.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/CUSTOMERS/Price%20Comparison%20tools/Consultation_Documents/C11-CEM-45-05a_Case_studies_PCT_11-Oct-2011bis.pdf)
- GGP on indicators for retail market monitoring for electricity and gas, ERGEG, October 2010, Ref. E10-RMF-27-03, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_PUBLICATIONS/CEER\\_PAPERS/Customers/Tab1/E10-RMF-27-03\\_final%20GGP%20IRMM\\_12-Oct-2010.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab1/E10-RMF-27-03_final%20GGP%20IRMM_12-Oct-2010.pdf)

- Status Review of the implementation of EC Good Practice Guidance for Billing, September 2010, Ref. E10-CEM-36-03, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_PUBLICATIONS/CEER\\_PAPERS/Guidelines%20of%20Good%20Practice/Other/E10-CEM-33-05\\_GGP-ComplaintHandling\\_10-Jun-2010.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Guidelines%20of%20Good%20Practice/Other/E10-CEM-33-05_GGP-ComplaintHandling_10-Jun-2010.pdf)
- GGP on customer complaint handling, reporting and classification, ERGEG, June 2010, Ref. E10-CEM-33-05, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_PUBLICATIONS/CEER\\_PAPERS/Guidelines%20of%20Good%20Practice/Other/E10-CEM-33-05\\_GGP-ComplaintHandling\\_10-Jun-2010.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Guidelines%20of%20Good%20Practice/Other/E10-CEM-33-05_GGP-ComplaintHandling_10-Jun-2010.pdf)
- Status review of the definitions of vulnerable customer, default supplier and supplier of last resort, ERGEG, July 2009, Ref. E09-CEM-26-04, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_PUBLICATIONS/CEER\\_PAPERS/Customers/Tab/E09-CEM-26-04\\_StatusReview\\_16-Jul-09.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab/E09-CEM-26-04_StatusReview_16-Jul-09.pdf)
- Customer Information Handbook. A review of good practices, ERGEG, December 2006, Ref. E06-CPR-04-03, [http://www.energy-regulators.eu/portal/page/portal/EER\\_HOME/EER\\_PUBLICATIONS/CEER\\_PAPERS/Customers/2006/E06-CPR-04-03\\_Customer\\_Info\\_Handbook.pdf](http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/2006/E06-CPR-04-03_Customer_Info_Handbook.pdf)

#### External documents

- The functioning of the retail electricity markets for consumers in the European Union - Commission staff working paper, EC, November 2010, Ref. SEC(2010)1409 final, [http://ec.europa.eu/consumers/strategy/docs/SWD\\_function\\_of\\_retail\\_electricity\\_en.pdf](http://ec.europa.eu/consumers/strategy/docs/SWD_function_of_retail_electricity_en.pdf)
- An energy policy for consumers - Commission staff working paper, EC, November 2010, Ref. SEC(2010)1407 final, [http://ec.europa.eu/energy/gas\\_electricity/doc/forum\\_citizen\\_energy/sec\(2010\)1407.pdf](http://ec.europa.eu/energy/gas_electricity/doc/forum_citizen_energy/sec(2010)1407.pdf)

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## EXECUTIVE SUMMARY

At the 3<sup>rd</sup> Citizens' Energy Forum in London in 2010, the European Commission presented an energy study exploring the benefits the liberalised energy market brings to customers in all 27 member states. One of the key findings of the study was that many customers did not have access to neutral, objective information that empowers them to take an active role in the liberalised energy markets, by switching contracts or suppliers to obtain a better deal. In some cases, this information was provided, but customers had trouble finding it.

Based upon these findings, the European Commission concluded that easy access to neutral, objective information is crucial for the further development of the European energy markets. CEER agreed to consider how to provide this information to customers and decided to establish Guidelines of Good Practice for Price Comparison Tools (PCTs). In October 2011 CEER published a consultation proposing 16 draft recommendations for PCTs. The 16 draft recommendations fell within the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correct and accurate, user-friendliness, accessibility and background information.

36 consultation responses were submitted and a public hearing was held on 14 March 2012 to discuss the role of PCTs. Overall, most stakeholders agreed with most of the recommendations CEER presented in its draft advice. All respondents agreed that PCTs should be independent, transparent, clear, accurate, and user friendly. The most contentious issue was whether self-regulation by PCTs is appropriate. Many stakeholders suggested that privately run PCTs need some sort of independent oversight which could be done through different routes: regulation, accreditation, legislation or voluntary codes of conduct. A document evaluating the consultation responses has been published on the CEER website.

This document presents the final 14 recommendations for price comparison tools which cover the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correct and accurate, user-friendliness, accessibility and customer empowerment.

There are a range of routes to setting standards for PCTs. NRAs or another public body may establish their own PCT or they may regulate private PCTs. Alternatively, self-regulation by PCT providers may be appropriate. Whatever the route, it is important that PCTs are independent from energy supply companies, that they are accurate and that they ideally present the full range of offers available. Customers then need clear and comprehensive information to help them understand and use this information. They also need to be able to filter choices in order to choose the best offer for their circumstances.

PCTs can empower energy customers if they provide a clear and trusted service and if additional information is available to help the customer to navigate and understand the market. Part of this empowerment is ensuring that PCTs are accessible to those customers who do not have access to the internet.

These final recommendations are being made to Member States, NRAs, public bodies, customer organisations, PCT providers and energy suppliers. All these organisations have a role to play in making price information clear and accessible for customers.

## The final recommendations

Final recommendations	
<b>I</b>	<b>Independence of the tool</b>
1	Any price comparison tool must be independent of energy supply companies, giving the user a non-discriminatory overview of the market. The provider of a price comparison tool should show all information in a consistent way.
2	There is always a role for NRAs in ensuring that PCTs work well to protect and empower customers. There are different ways NRAs can ensure this: <ul style="list-style-type: none"> <li>• Self-regulation by PCTs may be appropriate as a first step. Where self-regulation is used, the NRA or another public body has a role to actively monitor the standards in place.</li> <li>• Where self-regulation is not appropriate or is not sufficiently protecting customers the NRA or another public body should establish a voluntary accreditation scheme for PCTs or mandatory regulation of all PCTs.</li> <li>• NRAs or another public body may also decide to establish their own PCT service where no such private service exists or to compliment commercial PCTs.</li> </ul>
<b>II</b>	<b>Transparency</b>
3	PCTs should disclose the way they operate, their funding and their owners/shareholders, in order to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers.
<b>III</b>	<b>Exhaustiveness</b>
4	Ideally, all prices and products available for the totality of customers, if relevant to the customer, should be shown as a first step. However, if the presented information cannot give a complete overview of the market, the price comparison tool should clearly state this before showing the results of the price comparison. After the initial search, the option to filter results should be offered to the customer to select the offerings corresponding with his or her preferences.
<b>IV</b>	<b>Clarity and comprehensibility</b>
5	Costs presented on the PCT should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of the unit kWh-price. This should include any discounts and note clearly when those discounts end. It is also very important to indicate clearly that prices shown as a total cost are an estimation, as they are based on historic or estimated consumption. This is particularly important for floating price products, where unit prices are susceptible to change during the contract.
6	Fundamental characteristics of all products, for example fixed price products, floating price products or regulated end user prices, should be presented on the first page of

	the result screen. This differentiation should be easily visible to the customer. Explanations of the different types of offers should be available to help the customer understand their options.
7	The price comparison tool should offer information on additional products and services, if the customer wishes to use that information to help choose the best offer for them.
V	<b>Correctness and Accuracy</b>
8	Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.
VI	<b>User-friendliness</b>
9	The user should be offered help through default consumption patterns or, preferably, a tool that calculates the approximate consumption, based on the amount of the last bill or on the basis of other information available to the user.
VII	<b>Accessibility</b>
10	To ensure an inclusive service at least one additional communication channel (other than the Internet) for getting a price comparison should be provided free of charge or at minimal cost.
11	Online price comparison tools should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.
VIII	<b>Customer empowerment</b>
12	Customer awareness and trust of PCTs is important. Where the PCT is run by the NRA or a public body they should consider way to promote the service to customers. Where the NRA or a public body is regulating/ /accrediting/actively monitoring a privately run PCTs they should consider establishing a marker or logo so it is clear to customers which PCTs meet the necessary standards.
13	PCT providers should consider how best to empower customers to use their service and make appropriate choices for their needs. Background information on market functioning and market issues such as price developments should be provided if the customer wants this information. Alternatively a PCT could provide links to useful independent sources of information.
14	PCT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across PCTs can help to enable understanding.

## 1. Introduction

### 1.1. The importance of price comparison tools in empowering customers

There is still need for more and better information for energy customers to stimulate them to take part in the energy market in an active and effective way. CEER sees price comparison tools as a crucial instrument to provide information to electricity and gas customers.

Price comparison tools (PCTs) offer clear and transparent information to customers. There exist a broad variety of price comparison tools not only for energy but also for other market sectors such as insurance and mobile phones. In the energy sector, these tools are either publicly offered by the NRA or an authority dealing with customer protection issues or they can be privately-owned, for example by PCT providers who may receive a fee for mediation.

Energy suppliers may provide information about their range of offers, but this is likely to be limited to their own offers and is not independent, so such information is not considered by CEER to be a PCT.

According to CEER's GGP on retail market monitoring indicators (E10-RMF-27-03), a price comparison tool can be considered to be reliable if it meets the following requirements:

1. Information is correct and not misleading;
2. If bills are calculated, this calculation should be based on clear and transparent assumptions; and
3. Key information related to the tariff (e.g. the type of contract or duration of any discounts) is clearly presented to the customer.

In these GGP on retail market monitoring, CEER suggests that the quality of the information could be looked into for greater insight. CEER therefore recognises the high importance of analysing the current situation in its member countries and wants to offer some advice for further customer empowerment.

In October 2011 CEER launched a public consultation on draft advice on PCTs (Ref: C11-CEM-45-05) and published a series of case studies (CEM-45-05a). It outlined 16 draft recommendations for good practice in running price comparison services. The scope of the draft recommendations was to present best practices for Member States, national regulators and market players in designing and delivering well-functioning price comparison tools.

### 1.2. Context

The European Commission 2010 study of retail energy markets<sup>1</sup> found that many customers do not have access to neutral, objective information that empowers them to take an active role in the liberalised energy markets, by switching contracts or suppliers to obtain a better deal. In some cases, information is provided, but customers have trouble getting access to it. A lack of information hinders the development of a well-functioning liberalised market by having an influence on the number of switches and therefore the level of prices.

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<sup>1</sup> The functioning of retail electricity markets for European Union customers, Final Report 2010

Following its study, the European Commission concluded that easy access to neutral, objective, comparative information is crucial for the further development of the European energy markets. CEER therefore launched a work stream to prepare a draft advice on how to provide this information to customers.

In May 2012 the European Commission published its Customer Agenda to boost confidence and growth across different sectors. One of the four key objectives is improving implementation, stepping up enforcement and securing redress. We note as part of this the Commission's interest in the emerging role of online price comparison tools.

In most member countries, there is at least one price comparison tool providing information to household and small business customers.

The following are the primary models for price-comparison tools:

- Owned and run by the NRA or by another public body,
- Run by a private company, with regulatory oversight by a NRA or by another public body, or
- Run by a private company without regulatory oversight.

Each approach (privately-owned or public price comparison tools) has its own opportunities and advantages. CEER does not advocate either model of price comparison tool. However, the independence of price comparison tools from any individual energy supplier in terms of ownership or influence is a prerequisite for offering customers a transparent and fair overview of products and prices in a liberalised market.

CEER believes that price comparison tools owned, directly financed or supported in any other way by energy suppliers imply a certain risk of not being able to offer customers complete and independent information of the offers available. Specifically, any commission received should not influence the ranking of offers or the consistency of information.

We note that private and public PCTs can and do coexist within a country. If a PCT is a commercial service, customers should be able to use the service to search for options and contract with the chosen supplier. However, this may depend on the regulatory or commercial arrangements in place. We recognise that PCTs run by NRAs or public bodies may allow a customer to choose a supplier or contract, and the customer may then have to contact the supplier to complete the switch.

CEER believes that all aspects addressed in the recommendations should be taken into account by all price comparison tools, in relation to the market within which they operate. It is not the objective of the advice to define one fully harmonised price comparison tool for all European countries.

### 1.3. Process

In 2011 CEER held a workshop to gather case studies of PCTs. Based on these case studies, CEER developed draft recommendations and presented them to the Citizen's Energy Forum. In October 2011 CEER launched a public consultation on the draft advice on PCTs (Ref: C11-CEM-45-05a). It outlined 16 draft recommendations for good practice in running on line price comparison services. The consultation ended in December 2011. 36 responses were received to this consultation document. The Evaluation of Responses document is available on CEER's website [www.energy-regulators.eu](http://www.energy-regulators.eu). A public hearing was held on 14 March 2012 to discuss the findings from the consultation.

### 1.4. Scope of the GGP

With this paper, CEER would like to offer final recommendations on how price comparison tools can function effectively for energy customers.

We focus mostly on web-based tools, although other channels for obtaining price comparison information should also be available to customers. The aim of price comparison websites should always be to give information to the customer to give him/her the chance to make an independent choice and select whatever product and supplier suits him/her best.

These GGPs provide recommendations and present best practices for Member States, national regulators and market players when designing well-functioning price comparison tools. This advice also provides aspects that should be considered during the development process. However, the objective of the advice is not to define one fully harmonised price comparison tool for all European countries.

The focus of this document lies on the customers' perspective, meaning that the recommendations stated in this document aim at increasing customer awareness and information. CEER believes that the importance of energy for the totality of customers leads to the need of having clearly-structured and transparent price comparison tools.

As there are different models for price comparison tools, i.e. those owned and funded by NRAs or a public authority dealing with customer protection issues and others that are privately-run, a distinction between these tools has to be made. CEER believes that all aspects addressed in the recommendations should be taken into account by all price comparison tools, irrespective of the model adopted.

In the future, smart metering can enable more complex and innovative pricing formulas, such as dynamic time of use tariffs. This will present new challenges for price comparison tools. However, for the moment, CEER is focusing on how to ensure that the current operation of price comparison tools can benefit and empower customers.

## 2. Final recommendations

In this chapter we set out the final recommendations for price comparison tools. These final recommendations take into account views received during the consultation and the public hearing which was held on 14 March 2012.

These recommendations are being made to MS, NRAs, public bodies, customer organisations, PCT providers and energy suppliers. NRAs should share these GGP with PCTs providers and suppliers. Energy suppliers have a responsibility to work constructively with PCT providers. For example, if there are many complex offers in the market, it will be hard for the PCT to present them in a clear way. PCTs should be able to show all available offers though where this is not possible they must state that clearly to the customer.

### 2.1. Independence

Draft recommendation 1 stated that any price comparison tool must be independent, giving the user a non-discriminatory overview of the market and that the provider of a price comparison tool should show all information in a consistent way.

All respondents to the consultation supported this recommendation. CEER believes that price comparison tools owned, financed or supported in any other way by energy suppliers imply a certain risk of not being able to offer customers the complete and independent information they need to compare offers and switch suppliers. Therefore, PCTs must be independent *from individual energy supply companies*. Specifically, any commission received, or advertising orders, should not influence the ranking of an offer or the consistency of information. PCTs that are run by NRAs or other public bodies are likely to be, by their very nature, independent. However, we note that all PCTs, regardless of whether they are run by a NRA, a public body or a private company, should all meet high standards to protect and empower customers. Audits and random checks can be used to check PCTs are independent.

Consistency of information is important, but this should not compromise accuracy. Further, the need for consistent information should not constrain including new and innovative products.

**Final recommendation 1: Any price comparison tool must be independent of energy supply companies, giving the user a non-discriminatory overview of the market. The provider of a price comparison tool should show all information in a consistent way.**

Draft recommendations 2a and 2b identified potential routes to establishing standards i.e. regulation by the NRA or another public body (2a) and industry self-regulation (2b). The majority of respondents agreed that some regulatory oversight is important. This could be regulation, accreditation or monitoring of PCTs. Recommendation 2b was contentious with around half of respondents agreeing that a PCT led voluntary code could be suitable and the other half of respondents suggesting that such an industry code is insufficient to protect customers.

CEER considers that it is important to set standards for PCTs in order to protect customers. The standards should ensure that PCTs are independent, transparent, exhaustive, accurate and comprehensive. This can be achieved in a range of ways, through regulation by the NRA or another public body or via self-regulation by the PCT industry. The route chosen may depend upon the maturity of the market within a country. Whichever route is chosen, there is always a role for the NRA to ensure PCTs are working to protect and empower customers.

We note that private and public PCTs can and do coexist within a country. PCTs run by NRAs or public bodies may allow a customer to choose a supplier or contract, and the customer may then have to contact the supplier to complete the switch. Privately-owned price comparison tools can provide added value to customers, by providing a direct link to the supplier of their choice, thus making the process of switching contract or suppliers easier, and quicker. This can be an important incentive to customers to actively explore offers across the energy market. There is a motivation for the provider of the price comparison tool to enable switching as in most cases any switch is linked to a fee to the supplier or commission from them to the PCT provider. Suppliers should provide the necessary data to support this. However, it may depend on the regulatory or commercial arrangements in place.

Where a NRA or other public body establishes standards for PCTs, appropriate enforcement procedures need to be in place to ensure those standards are being met.

**Final recommendation 2: There is always a role for NRAs in ensuring that PCTs work well to protect and empower customers. There are different ways NRAs can ensure this:**

- **Self-regulation by PCTs may be appropriate as a first step. Where self-regulation is used, the NRA or another public body has a role to actively monitor the standards in place.**
- **Where self-regulation is not appropriate or is not sufficiently protecting customers the NRA or another public body should establish a voluntary accreditation scheme for PCTs or mandatory regulation of all PCTs.**
- **NRAs or another public body may also decide to establish their own PCT service where no such private service exists or to compliment commercial PCTs.**

## 2.2. Transparency

There was strong support for draft recommendation 3, that PCTs should disclose the way they operate. This information can help to build customer trust in the service and should be presented in a clear, understandable way. NRAs and other public bodies should consider monitoring this information on behalf of customers, to help build trust.

**Final recommendation 3: PCTs should disclose the way they operate, their funding and their owners/shareholders, in order to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers.**

### 2.3. Exhaustiveness

Draft recommendations 4 and 5 identified the need to display all offers to the customer to provide a complete picture of the market. Key information such as postcodes may be entered at this stage in the process, but this should not act as a barrier to engagement. Customers should then be given the option to input additional information to filter the results to their needs or circumstances. An example of how this process may work is as follows:

1. As a first step, ask the customer to enter only essential information, i.e. their postcode. All offers should then be shown to the customer.
2. Secondly, the different tariff types should be identified, with explanations available if necessary.
3. As a last step, customer should then be given the option to add further information about their needs or preferences to filter or tailor the results.

Any data which a customer inputs to filter their results should be handled in a way that meets the relevant data protection requirements.

**Final recommendation 4: Ideally, all prices and products available for the totality of customers, if relevant to the customer, should be shown as a first step. However, if the presented information cannot give a complete overview of the market, the price comparison tool should clearly state this before showing the results of the price comparison. After the initial search, the option to filter results should be offered to the customer to select the offerings corresponding with his or her preferences.**

### 2.4. Clarity and comprehensibility

Draft recommendation 6 showed the importance of presenting costs in a clear way, whether presented on a yearly basis or as a unit price. Where any estimations or calculations have been made this should be made clear to the customer, to avoid misleading them. This recommendation has not been changed in essence but we have clarified it to include consideration of how discounts are presented.

**Final recommendation 5: Costs presented on the PCT should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of the unit kWh-price. This should include any discounts and note clearly when those discounts end. It is also very important to indicate clearly that prices shown as a total cost are an estimation, as they are based on historic or estimated consumption. This is particularly important for floating price products, where unit prices are susceptible to change during the contract.**

Draft recommendation 7 stated that fundamental characteristics of all products – such as fixed price products versus floating price products – should be presented on the first page of the result screen. This differentiation should be easily visible to the customer. Draft recommendation 9 stated that if regulated end user prices exist, they have to be highlighted visibly in the default presentation of the price comparison tool. It is important that the type of contract is clear to the customer; however this information should be presented in an impartial way to allow the customer to choose which is best for them. This point has been included within final recommendation 6. To further help customers, explanations should be provided of the different types of offers to help them understand the options available.

**Final recommendation 6: Fundamental characteristics of all products, for example fixed price products, floating price products or regulated end user prices, should be presented on the first page of the result screen. This differentiation should be easily visible to the customer. Explanations of the different types of offers should be available to help the customer understand their options.**

Draft recommendation 8 stated that the price comparison tool should offer additional information on products and services. This information should be available with additional details on a separate page so the customer has the choice to look at this information or not. We recognise that customers may not wish to choose a product based upon the price or contract type alone. Other features may be important such as customer satisfaction levels or whether the energy is green.

**Final recommendation 7: The price comparison tool should offer information on additional products and services, if the customer wishes to use that information to help choose the best offer for them.**

## 2.5. Correctness and Accuracy

Draft recommendation 10 stated that price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market. Respondents to the consultation suggested a range of different frequencies with which price and contract information should be updated ranging from within 24 hours to within 5 days. We believe the frequency of updating PCTs depends on how regularly prices in a particular market change and should be agreed between the PCT provider and energy suppliers.

The process and timing of data provision should be based on commercial agreements between the PCT provider and energy suppliers. These arrangements should not present a barrier to a supplier participating. However, PCTs shouldn't enter into arrangements that are not compatible with our goals to be exhaustive and transparent. Offers should be removed from a PCT as soon as they have expired and it may be prudent to warn customers if there is an impending price change.

**Final recommendation 8: Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.**

## 2.6. User-friendliness

We have not made any changes to draft recommendation 11. This recommendation recognises that knowing one's energy consumption is important in selecting the right offer; however customers may not know what their energy consumption actually is or where to find that information.

Ideally, customers should input their actual consumption to receive the best results for their needs. It can be helpful to provide customers with a choice of what information to provide. For example, customers can enter their annual consumption (in kWh) or the cost of their monthly or yearly bills. Customers should be encouraged to do this where they have the data. However, if they don't have access to that information, or do not understand it, standardised consumption data can be helpful. Suppliers also have a role to make sure consumption information is clear on a customer's bill.

**Final recommendation 9: The user should be offered help through default consumption patterns or, preferably, a tool that calculates the approximate consumption, based on the amount of the last bill or on the basis of other information available to the user.**

## 2.7. Accessibility

Draft recommendation 12 suggested that at least one additional communication channel (other than the Internet) for getting a price comparison should be provided free of charge or at minimal cost. There are a significant number of customers who do not have access to the Internet or are not confident using the Internet for price comparisons. PCTs that do not provide information through additional channels exclude such customers. Given that price and contract information can be complex, information provided through additional channels should be as user-friendly as possible.

**Final recommendation 10: To ensure an inclusive service at least one additional communication channel (other than the Internet) for getting a price comparison should be provided free of charge or at minimal cost.**

No changes have been made to draft recommendation 13 as it is important that online PCTs are designed to be accessible.

**Final recommendation 11: Online price comparison tools should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.**

Draft recommendation 14 concerned the use of social media to promote PCTs. It has been revised and is now included under the 'empowering customers' theme.

## 2.8. Empowering customers

The final theme was originally titled 'background information' however we feel that 'empowering customers' more accurately reflects the purpose of this information.

It is important that customers are aware of the existence of PCTs and how they can use them to compare offers and switch. Privately run PCTs are likely to market their services for commercial reasons. Publicly-run PCTs should also consider how they can promote their service to customers. Draft recommendation 14 identified the potential use of social media to promote PCTs. Social media is one potential route for promoting the use of PCTs.

Customer trust of PCTs can be enhanced through setting high standards and making it visible and clear to customers that a particular site has met a certain standard, set by an independent body. Ways of doing this may include having a clear statement on the PCT, or a marker or logo to show that it has been approved or accredited.

**Final recommendation 12: Customer awareness and trust of PCTs is important. Where the PCT is run by the NRA or a public body they should consider way to promote the service to customers. Where the NRA or a public body is regulating/ accrediting/actively monitoring a privately run PCTs they should consider establishing a marker or logo so it is clear to customers which PCTs meet the necessary standards.**

PCTs can empower customers by providing clear and comprehensive information. Additional information can be available if a customer wants it, though any background information should be helpful and avoid overloading the customer. Across the PCT, all information should be written and presented in a clear way to aid understanding. Using consistent or standardised terms and language within and across PCTs can help to avoid customer confusion.

**Final recommendation 13: PCT providers should consider how best to empower customers to use their service and make appropriate choices for their needs. Background information on market functioning and market issues such as price developments should be provided if the customer wants this information. Alternatively a PCT could provide links to useful independent sources of information.**

**Final recommendation 14: PCT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across PCTs can help to enable understanding.**

Draft recommendation 16 stated an example of a good practice is to offer additional services on request, such as a “reminder” if the customer is bound by a contract when doing the price comparison, if the customer chooses to receive this. This is a specific example of how a PCT may help empower customers, rather than a condition for empowerment and therefore has not been included in the final recommendations. We note that such services should meet privacy and data protection standards.

## **2.1. Future developments**

PCTs will need to continue to develop and evolve as new technologies such as smart metering and dynamic time of use tariffs are offered to customers. PCT providers will need to continue to ensure that they operate to empower customer choice. CEER will maintain a role in promoting empowerment and ensuring sufficient protection for customers.

## Annex 1 – CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. Through CEER, a not-for-profit association, the national regulators cooperate and exchange best practice. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest.

CEER works closely with (and supports) the [Agency for the Cooperation of Energy Regulators \(ACER\)](#).

ACER, which has its seat in Ljubljana, is an EU Agency with its own staff and resources. CEER, based in Brussels, deals with many complementary (and not overlapping) issues to ACER's work such as international issues, smart grids, sustainability and customer issues.

The work of the CEER is structured according to a number of working groups, composed of staff members of the national energy regulatory authorities. These working groups deal with different topics, according to their members' fields of expertise.

This report was prepared by the Customer Empowerment Task Force of the Customers and Retail Markets Working Group.

## Annex 2 – List of abbreviations

Term	Definition
CEER	Council of European Energy Regulators
CEM TF	Customer Empowerment Task Force
EC	European Commission
EU	European Union
GGP	Guidelines of Good Practice
NRA	National Regulatory Authority
PCT	Price comparison tool
CRM WG	Customer and Retail Market Working Group
RMF TF	Retail Market Functioning Task Force
WAG	Web Content Accessibility Guidelines
MS	Member State

**Table 2 – List of Abbreviations**