



**CEER Advice on Customer Data
Management for Better Retail Market
Functioning**
Electricity and Gas

Evaluation of Responses

Ref. C14-RMF-68-03a
19 March 2015



INFORMATION PAGE

Abstract

On 23rd March 2014, a public consultation was launched on CEER's draft advice on customer data management for better retail market functioning (Ref: C13-RMF-57-04). The draft advice identified 5 guiding principles (Privacy & Security, Transparency, Accuracy, Accessibility and Non-discrimination) and sought views on a set of draft recommendations across the 5 guiding principles.

The draft advice posed questions to stakeholders in order to provide input to CEER for its final advice.

This document accompanies the final CEER advice on customer data management for better retail market functioning (Ref: C14-RMF-68-03) and provides the evaluation of responses to the public consultation on the draft advice. Chapter 3 provides a list of the respondents and a detailed evaluation of the responses received. The complete stakeholder responses can be found at CEER's website (www.ceer.eu), under closed public consultations.

Target Audience

European Commission, customers, prosumers, suppliers, distribution system operators, energy service companies, network owners, metering operators, Member States, National Regulatory Authorities, academics and other interested parties.

Keywords

Data management; 2020 Vision; smart meters; smart grids; energy consumers.

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1. Introduction

1.1. Background

On 25th October 2012, the EU adopted the Directive 2012/27/EU on energy efficiency. Article 9 of this Directive sets out the rules in relation to metering. In particular, the Directive establishes the importance of customers, or third parties acting on behalf of customers, being provided with good quality data. It also reinforces the importance of ensuring the security of data provision and protecting the privacy of customers.

At the 2012 Citizens' Energy Forum, CEER and BEUC, launched the 2020 Vision for Europe's energy customers¹. It set out a vision of an energy sector that puts smaller customers first.

The vision can be characterised by four principles governing the relationship between the energy sector and its variety of customers (RASP principles): reliability, affordability, simplicity, protection and empowerment. CEER sees focusing on a Vision as a valuable means of giving great priority to customer issues, based on more effective engagement with customer bodies. One of the work packages it identified to promote the 2020 Customer Vision was advice on data management for better retail market functioning. Hence, CEER decided to start a process with the target to present an advice on customer data management.

1.2. Objective and Purpose of this paper

This Evaluation of Responses document reports in a summarised way the responses received to CEER's public consultation on customer data management for better retail market functioning. The CEER consultation ran from 23rd March until 23rd May 2014 and was carried out through a dedicated online questionnaire on the CEER website.

In addition to the summarised responses, this paper also provides CEER's evaluation of the comments received and indicates where changes in the final advice have been made in relation to the draft advice.

Chapter 3 provides a summary of respondents' views and CEER's reaction to these. A list of the respondents can also be found in Chapter 3. The exact response from each stakeholder can be found at CEER's website: www.ceer.eu, under Closed Public Consultations.

The results of the consultation were presented and discussed at a public hearing on 22nd September 2014.

2. Questions for Public Consultation

The public consultation proposed and sought views on 14 draft recommendations across five guiding principles: Privacy & Security, Transparency, Accuracy, Accessibility and Non-discrimination.

¹ [A 2020 Vision for Europe's Energy Customers](#), 12 November 2012



Guiding Principles	Public Consultation Questions
Privacy and Security	<p>1. Customer meter data should be protected by the application of appropriate security measures that prevent unauthorised access but which allow access to parties authorised to receive it, such as DSOs/metering operators. This customer data protection should be ensured by (tick one box):</p> <ul style="list-style-type: none"> • Legislation/regulation • Contract between customer and relevant parties • Code of conduct • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p>
	<p>2. Customers retain the right to control the use of their customer meter data. Specific parties (e.g. DSOs/metering operators and suppliers) should be authorised to access that data. However, the authorisation to access that data and the terms on which that data can be used should be ensured by (tick one box):</p> <ul style="list-style-type: none"> • Legislation/regulation • Contract between customer and relevant parties • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p>
	<p>General comments on the guiding principle: Privacy and Security (maximum 3500 characters)</p>
Transparency	<p>3. The relevant body (NRA/DSO/metering operator/TSO/other) shall ensure that, as a minimum, the customer has knowledge of general information on meter data management: (a) the customer's rights with regard to data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; and (d) how both the customer and third parties get access to that data.</p> <ul style="list-style-type: none"> • Agree • Disagree • No opinion
	<p>4. The customer meter data which comes out of the data management processes should be transparent to the customer. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through (tick one or several boxes):</p>



	<ul style="list-style-type: none"> • Providing clarity on how information can be accessed • Setting a maximum time period during which a customer has to wait to receive that information after having moved in to a new premises • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p>
<p>Transparency</p>	<p>5. The customer meter data should be transparent to a third party, to whom a customer has provided such consent. By third party we mean a party that needs customer consent to manage data, hence not a party already authorised by law and/or carrying out regulatory tasks for system operation. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through (tick one or several boxes):</p> <ul style="list-style-type: none"> • Providing the third party clarity on how information can be accessed • Setting a maximum time period during which a third party has access to the information • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p>
	<p>6. The relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data in order to achieve energy efficiency benefits and other potential benefits.</p> <p>(a) That body or bodies should be (tick one or several boxes):</p> <ul style="list-style-type: none"> • NRA • DSO/metering operator • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p> <p>(b) Active steps might include (tick one or several boxes):</p> <ul style="list-style-type: none"> • Information campaign • Use of energy advisor • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p>
	<p>7. There should be a common standard for data content, data formats and data exchange in the retail market.</p> <ul style="list-style-type: none"> • Agree • Disagree • No opinion



	<p>8. The common standards for data content, data formats and data exchange in the retail market should be set on (tick one box):</p> <ul style="list-style-type: none"> • European level • Regional level (across national borders) • National level • Sub-national level • No opinion
	<p>9. (a) The data that should be standardised should as a minimum/as a starting point be (tick one or several boxes):</p> <ul style="list-style-type: none"> • Point of delivery identification data • User and contract data • Consumption data • Other (please specify in the comment box below) • No opinion <p>Comment box (3500 characters maximum)</p> <p>(b) NRAs should ensure that appropriate arrangements are in place for the development of common standards for data content, data format and data exchange and monitoring of compliance.</p> <ul style="list-style-type: none"> • Agree • Disagree • No opinion
	<p>10. The general information on meter data management (as specified in draft recommendation 3) should as a minimum be published on the website of the relevant body (NRA/DSO/metering operator/TSO/other), and must be presented in a customer-friendly way.</p> <ul style="list-style-type: none"> • Agree • Disagree • No opinion
	<p>General comments on the guiding principle: Transparency (maximum 3500 characters)</p>
<p>Accuracy</p>	<p>11. Relevant bodies (NRA/DSO/metering operator/TSO/other) should have in place standardised measures available to the customer to enable any remaining inaccuracy concerning data management to be addressed. Those measures should include a timetable set out in (tick one box):</p> <ul style="list-style-type: none"> • Legislation/regulation • Contract • Code of conduct • Other (please specify in the comment box below) • No need for standardisation processes for remaining inaccuracy



	<ul style="list-style-type: none"> No opinion <p>Comment box (3500 characters maximum)</p>
	<p>General comments on the guiding principle: Accuracy (maximum 3500 characters)</p>
Accessibility	<p>12.The customer (or party acting on behalf of the customer) should have easy access to his/her customer meter data. This information should be made available in a way that is standardised and through a channel of the customer's choosing (web, paper, etc.). The common standards for provision to customer of meter data information should be provided at (tick one box):</p> <ul style="list-style-type: none"> European level Regional level (across national borders) National level Sub-national level No need to standardise customer meter data No opinion
	<p>13.The arrangements for accessing customer meter data should be proportionate. Subject to customer choice, access should only be provided to a party where it requires that particular customer meter data (not just any data) and where they can use it to deliver wider benefits, including to customers.</p> <ul style="list-style-type: none"> Agree Disagree No opinion
	<p>General comments on the guiding principle: Accessibility (maximum 3500 characters)</p>
Non-discrimination	<p>14.To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. Specifically in relation to smart meters, there should be non-discriminatory access to information if and where smart meters are installed.</p> <ul style="list-style-type: none"> Agree Disagree No opinion
	<p>General comments on the guiding principle: Non-discrimination (maximum 3500 characters)</p>
Further questions for	<p>FQ1.Do you agree with the list of relevant stakeholders we have identified in Section 5.1 of the paper? If not, which other stakeholders do you think should be included and why?</p>



public consultation	FQ2.Do you agree that we have correctly identified the right categories of data – defined as ‘customer meter data’ – in Section 4.2 of the paper, as being relevant to retail market functioning and thus within the scope of our draft advice?
	<p>FQ3.In relation to the 5 proposed guiding principles?</p> <ul style="list-style-type: none"> a) Do you agree with the proposed guiding principles in Chapter 8 of the paper? Should any be added or removed? b) Do you see any conflicting principles, which can eventually create problems in the energy market?
	FQ4.Do you agree that standardisation of data content, data formats and data exchange, set out in Section 4.3 of the paper, is important?

Table 1 Questions for public consultation



3. Outcome of the Public Consultation

3.1. Summary of Responses Received

There were 58 respondents to the public consultation of which 7 were confidential and hence do not appear in the following tables. Table 1 provides a list of the respondents by type of organisation and Table 2 provides the number of responses received by country.

	Respondent Groups	Abbreviated Name	Country of Origin
Industry Associations (15)			
1	ASOCIACIÓN ESPAÑOLA DE LA INDUSTRIA ELÉCTRICA	UNESA	Spain
2	ASSOCIATION OF AUSTRIAN ELECTRICITY COMPANIES	ESMA	Austria
3	BUNDERVERBAND DER ENERGIE- UND WASSERWIRTSCHAFT	BDEW	Germany
4	BUNDESVERBAND NEUE ENERGIEANBIETER	BNE	Germany
5	CEDEC	CEDEC	EU
6	DANISH ENERGY ASSOCIATION	DANEA	Denmark
7	ENERGY NORWAY	ENNOR	Norway
8	EURELECTRIC	EURELECTRIC	EU
9	EUROGAS DISTRIBUTION SYSTEM OPERATORS COMMITTEE	EUROGAS	EU
10	EUROPEAN SMART METERING INDUSTRY GROUP	ESMIG	EU
11	FINNISH ENERGY INDUSTRIES	ET	Finland
12	GEODE	GEODE	EU
13	SVENSK ENERGI – SWEDENERGY	SE	Sweden
14	THUEGA AG	THUEGA	Germany
15	VERBAND KOMMUNALER UNTERNEHMEN e.V.	VKU	Germany
Energy Supply Companies (12)			
16	BRITISH GAS	BG	UK
17	EDF	EDF	France
18	EDISON SPA	EDISON	Italy
19	ENEL	ENEL	Italy
20	ENERGIE BADEN-WÜRTTEMBERG AG	ENBW-R	Germany
21	E.ON	E.ON	Germany
22	GDF SUEZ	GDF	France
23	GRUNDGRÜN ENERGIE GmbH	GRUNDGRÜN	Germany
24	PGE POLSKA GRUPA ENERGETYCZNA S.A.	PGE	Poland
25	RWE DEUTSCHLAND AG	RWE	Germany
26	STADTWERKE HANNOVER AG	ST-HAN	Germany
27	VATTENFALL AB	VATTENFALL	Sweden



Other (technology providers, manufacturing, research and consultancy) Firms (7)			
28	DNV GL ENERGY	DNV GL	Norway
29	EAST-CONNECT BUSINESS DEVELOPMENT	ECBD	Germany
30	ENERGY EXEMPLAR	ENEX	Australia
31	GEMSERV	GEMSERV	UK
32	LANDIS+GYR AG	LGYR	Switzerland
33	OPOWER	OPOWER	USA
34	SIEMENS	SIEMENS	Germany
Consumer Associations (6)			
35	ANEC	ANEC	EU
36	BELGIAN ENERGY OMBUDSMAN	EO	Belgium
37	BEUC, THE EUROPEAN CONSUMER ORGANISATION	BEUC	EU
38	CITIZENS ADVICE	CA	UK
39	OMBUDSMAN SERVICES	OS	UK
40	SOUTH-WEST OLTENIA ELECTRICITY CONSUMER ASSOCIATION	SOECA	Romania
DSOs / Network Operators (6)			
41	EANDIS	EANDIS	Belgium
42	ERDF (ELECTRICITÉ RÉSEAU DISTRIBUTION FRANCE)	ERDF	France
43	GRDF	GRDF	France
44	NOE NETZ	N-NETZ	Austria
45	SVENSKA KRAFTNÄT	SVK	Sweden
46	UNIÓN FENOSA DISTRIBUCIÓN	UFD	Spain
Authorities (2)			
47	AUSTRIAN FEDERAL CHAMBER OF LABOUR	BAK	Austria
48	SECTION IPET AT ENERGY INDUSTRY CHAMBER OF SLOVENIA	IPET	Slovenia
Standardisation Bodies (2)			
49	EUROPEAN ENVIRONMENTAL CITIZENS ORGANISATION FOR STANDARDISATION	ECOS	EU
50	EUROPEAN FORUM FOR ENERGY BUSINESS INFORMATION EXCHANGE	EBIX	EU
Aggregators (1)			
51	VERBUND AG	VERBUND	Austria

Table 2 - Overview of Respondents – Breakdown by Respondent Group (excluding confidential)



Country of Origin	Number of Respondents
GERMANY	11
EU	9
AUSTRIA	4
FRANCE	4
UK	4
SWEDEN	3
BELGIUM	2
ITALY	2
NORWAY	2
SPAIN	2
DENMARK	1
FINLAND	1
POLAND	1
ROMANIA	1
SLOVENIA	1
SWITZERLAND	1
OTHER	2
TOTAL	51

Table 3 - Overview of Respondents – Breakdown by Country of Origin (excluding confidential)



3.2. Evaluation of Responses

CEER has evaluated all the responses received as a result of the public consultation in terms of both applicability and consistency.

Respondents could choose among different options when providing the answers to the different questions. Moreover, in most of the questions, it was also possible to insert a short comment on the rationale for their position.

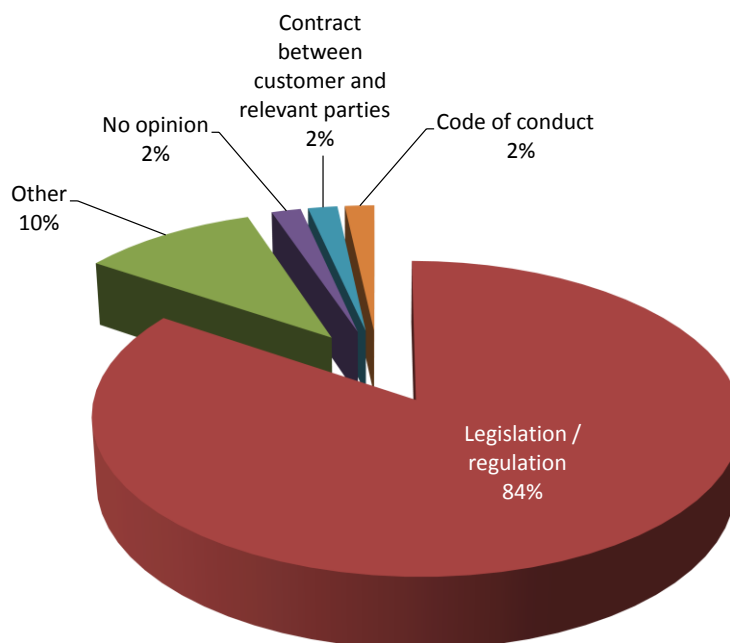
This document summarises respondents' views and CEER's evaluation of the comments received. Where the issues raised prompted a change in the final advice, this has been reflected by CEER in its comments. On the other hand, in those cases where respondents have requested amendments but CEER does not deem these changes necessary, an explanation for such decision has been provided.

Privacy and Security

1. *Customer meter data should be protected by the application of appropriate security measures that prevent unauthorised access but which allow access to parties authorised to receive it, such as DSOs/metering operators. This customer data protection should be ensured by (tick one box):*

- *Legislation/regulation*
- *Contract between customer and relevant parties*
- *Code of conduct*
- *Other (please specify in the comment box below)*
- *No opinion*

Comment box (3500 characters maximum)



Number of Responses: 58

Figure 1 Answers to question 1



Q-1. Customer data protection should be ensured by:	Legislation / regulation	Other	No opinion	Contract between customer and relevant parties	Code of conduct
Aggregators	1				
Authorities	2				
Consumer Associations	3	2	1		
DSOs / Network Operators	5	1			
Energy Supply Companies	12				
Industry Associations	12	1		1	1
Other Firms	6	1			
Standardisation Bodies	2				
Total	43	5	1	1	1

Table 4 Answers to question 1 by respondent group (excluding confidential)



Q-1. Customer data protection should be ensured by:	Legislation / regulation	Other	No opinion	Contract between customer and relevant parties	Code of conduct
Austria	2	1			1
Belgium	2				
Denmark				1	
EU	7	1	1		
Finland	1				
France	4				
Germany	11				
Italy	2				
Norway	2				
Other	2				
Poland	1				
Romania	1				
Slovenia	1				
Spain	2				
Sweden	2	1			
Switzerland	1				
UK	2	2			
Total	43	5	1	1	1

Table 5 Answers to question 1 by country of origin (excluding confidential)

Question/issue	Respondent's feedback	CEER's position
<p>Question 1: Customer meter data should be protected by the application of appropriate security measures that prevent unauthorised access but which allow access to parties authorised to receive it, such as DSOs/metering operators. This customer data protection should be ensured by: (a) Legislation/regulation; (b) Contract between customer and relevant parties; (c) Code of conduct; (d) Other; and (e) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> There is a strong support for the use of "legislation/regulation", which was the most selected answer. Some of the respondents that answered "other", which was the second most selected answer, support a combination of different data protection solutions (European and local legislation/regulation, enforceable codes of conduct and customer contracts), while others suggest alternative approaches (i.e. voluntary agreements). <p>CEER's Proposal: Merge recommendation 1 and recommendation 2 as follows:</p> <p>Customer meter data is protected by the application of appropriate security and privacy measures. Customers should be in control of their customer meter data and have the right to retain consent given to a market participant. Parties with regulated duties should be authorised to access the data they need to</p>		



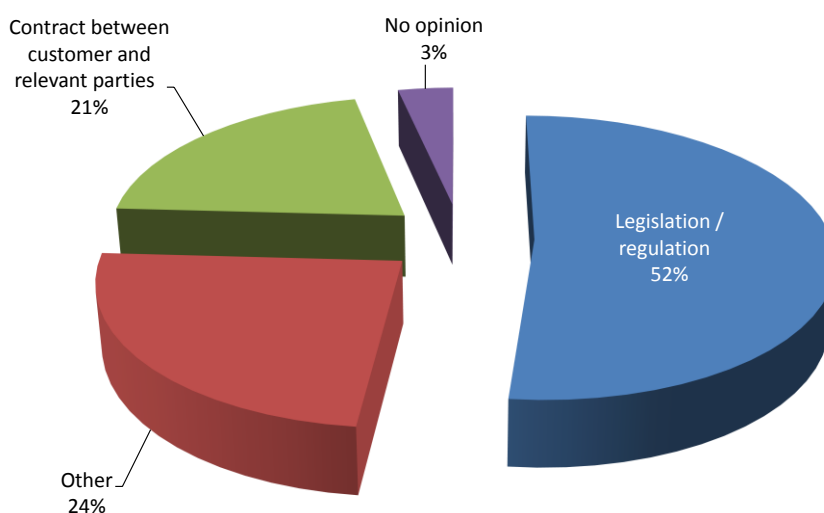
perform their duties. This possibility to allow access to the customer meter data should be ensured by legislation/regulation.		
Ensure target use of data	Two respondents add that it must be assured that all information is only used for the proposed use.	Agree. This idea is implicit in recommendation 13.
Decision at national level	Two respondents think that each Member State should determine how best to establish consumer confidence, by using a mix of instruments (contracts between consumer and supplier, legislation/regulation) or establishing a tailored code of conduct.	Noted. Data privacy is such a sensitive issue for consumers that legal measures should be in place to ensure their protection.
Differentiation between types of data	One respondent believes that legislation should ensure a differentiation between data for consumption billing and technical data.	Agree. Technical data used for grid operation is out of the scope of this paper.
Legislation at EU level	Two respondents consider that the best solution would be supporting EU-level legislation and/or regulatory guidance designed to encourage complementary Member State implementations of the Energy Efficiency Directive and the Data Protection Directive.	Agree.
Unrestricted data access for some agents only	One respondent states that suppliers should be given unrestricted access to data, since it is necessary to perform their tasks. On the other hand, access for any other agents should be subject to explicit consent by the customer.	Disagree. As stated in recommendation 13, the arrangements for accessing customer meter data should be proportionate.
Combination of different solutions	Several respondents support an alternative approach achieved by either a combination of effective data protection legislation and enforceable codes/guidelines, or contracts between customers and relevant parties.	Noted. Data privacy is such a sensitive issue for consumers that legal measures should be in place to ensure their protection.



2. Customers retain the right to control the use of their customer meter data. Specific parties (e.g. DSOs/metering operators and suppliers) should be authorised to access that data. However, the authorisation to access that data and the terms on which that data can be used should be ensured by (tick one box):

- Legislation/regulation
- Contract between customer and relevant parties
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)



Number of responses: 58

Figure 2 Answers to question 2

Q-2. The authorisation to access customer meter data and the terms on which that data can be used should be ensured by:	Legislation / regulation	Other	Contract between customer and relevant parties	No opinion
Aggregators	1			
Authorities	2			
Consumer Associations	3	2		1
DSOs / Network Operators	3	2	1	
Energy Supply Companies	6	2	4	
Industry Associations	7	5	2	1
Other Firms	4	1	2	
Standardisation Bodies	1		1	
Total	27	12	10	2

Table 6 Answers to question 2 by respondent group (excluding confidential)



Q-2. The authorisation to access customer meter data and the terms on which that data can be used should be ensured by:	Legislation / regulation	Other	Contract between customer and relevant parties	No opinion
Austria	2	1	1	
Belgium	1	1		
Denmark			1	
EU	5	2	1	1
Finland	1			
France	2		2	
Germany	4	4	3	
Italy	1		1	
Norway	2			
Other	2			
Poland	1			
Romania	1			
Slovenia	1			
Spain	1			1
Sweden	1	2		
Switzerland			1	
UK	2	2		
Total	27	12	10	2

Table 7 Answers to question 2 by country of origin (excluding confidential)



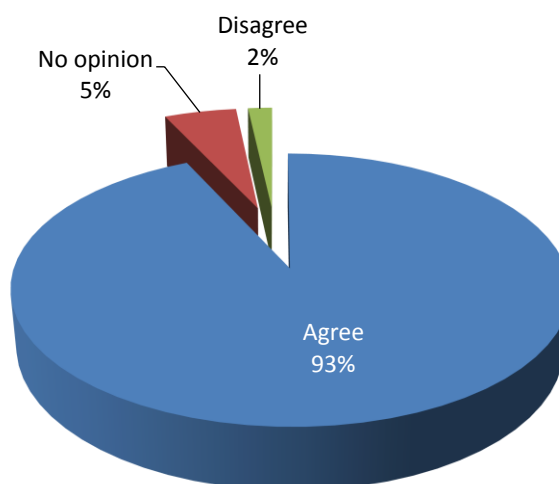
Question/issue	Respondent's feedback	CEER's position
<p>Question 2: Customers retain the right to control the use of their customer meter data. Specific parties (e.g. DSOs/metering operators and suppliers) should be authorised to access that data. However, the authorisation to access that data and the terms on which that data can be used should be ensured by: (a) Legislation/regulation; (b) Contract between customer and relevant parties; (c) Other; and (d) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> In general, most stakeholders believe that authorisation to access and use customer meter data should be ensured by "legislation/regulation". However, many of these respondents also consider that a "contract between customer and relevant parties" should be established in certain cases. The second most selected answer was "Other", in which several combinations of the different options were proposed, closely followed by "Contract between customer and relevant parties". Some respondents note that customer consent is essential in maintaining confidence in data management. Therefore, customers should provide authorisation before any data are provided to third parties, since it should always be clear that the customer is in control of the data. <p>CEER's Proposal: The second part of recommendation 2 is already addressed in later recommendations. Merge recommendation 1 and the first part of recommendation 2 as follows:</p> <p>Customer meter data should be protected by the application of appropriate security and privacy measures. Customers should control access to their customer meter data, with the exception of data required to fulfil regulated duties and within the national market model.</p> <p>The principle should be that the party shall state what information they will collect, with what frequency and for how long.</p>		
Importance of customer consent	Most respondents believe that the customer, as the owner of the data, has the fundamental right to access and control it. Therefore, except authorised by law or carrying out regulatory tasks, customers should always explicitly give their consent before their data are made available to a third party.	Agree.
Dependant on the agent	Most respondents consider that access to data should be ensured by legislation/regulation for those agents directly operating the system (DSO/metering operator, data hub, suppliers), while it should be subject to a contract between a customer and relevant parties in any other case (ESCOs, aggregators, etc.).	Agree.
Supplier centric model	Three respondents suggest that the supplier should be the main point of contact with the customer and, thus, should be authorised to access meter data.	Agree. As stated in recommendation 13, the arrangements for accessing customer meter data should be proportionate.



Transparency

3. *The relevant body (NRA/DSO/metering operator/TSO/other) shall ensure that, as a minimum, the customer has knowledge of general information on meter data management: (a) the customer's rights with regard to data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; and (d) how both the customer and third parties get access to that data.*

- Agree
- Disagree
- No opinion



Number of responses: 58

Figure 3 Answers to question 3

Q-3. The relevant body shall ensure that, as a minimum, customer has knowledge of general information on meter data management	Agree	No opinion	Disagree
Aggregators	1		
Authorities	2		
Consumer Associations	4	2	
DSOs / Network Operators	6		
Energy Supply Companies	12		
Industry Associations	14		1
Other Firms	7		
Standardisation Bodies	1	1	
Total	47	3	1

Table 8 Answers to question 3 by respondent group (excluding confidential)



Q-3. The relevant body shall ensure that, as a minimum, customer has knowledge of general information on meter data management	Agree	No opinion	Disagree
Austria	4		
Belgium	2		
Denmark	1		
EU	6	3	
Finland	1		
France	4		
Germany	10		1
Italy	2		
Norway	2		
Other	2		
Poland	1		
Romania	1		
Slovenia	1		
Spain	2		
Sweden	3		
Switzerland	1		
UK	4		
Total general	47	3	1

Table 9 Answers to question 3 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 3: The relevant body (NRA/DSO/metering operator/TSO/other) shall ensure that, as a minimum, the customer has knowledge of general information on meter data management: (a) the customer's rights with regard to data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; and (d) how both the customer and third parties get access to that data: (a) Agree; (b) Disagree; and (c) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> There is a strong support for greater transparency, since almost all the respondents (93%) agree with the proposed statement. 5% of the respondents did not provide an answer to this question. <p>CEER's Proposal: Merge recommendations 3, 4, part of 5 and 10 as follows:</p> <p>The relevant body in each MS (DSO/metering operator/other) shall make the following general information on meter data management publically available, as a minimum: (a) the customer's rights with regard to customer data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; (d) how the customer and market participants authorised by the customer get access to that data; and (e) within what time period the customer and market participants authorised by the customer have to wait to get disaggregated data. This should be ensured by the NRA.</p> <p>The above general information on meter data management should, as a minimum, be published on the website of the relevant body (DSO/metering operator/other) and must be presented in a customer-friendly way.</p>		



4. The customer meter data which comes out of the data management processes should be transparent to the customer. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through (tick one or several boxes):

- Providing clarity on how information can be accessed
- Setting a maximum time period during which a customer has to wait to receive that information after having moved in to a new premises
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

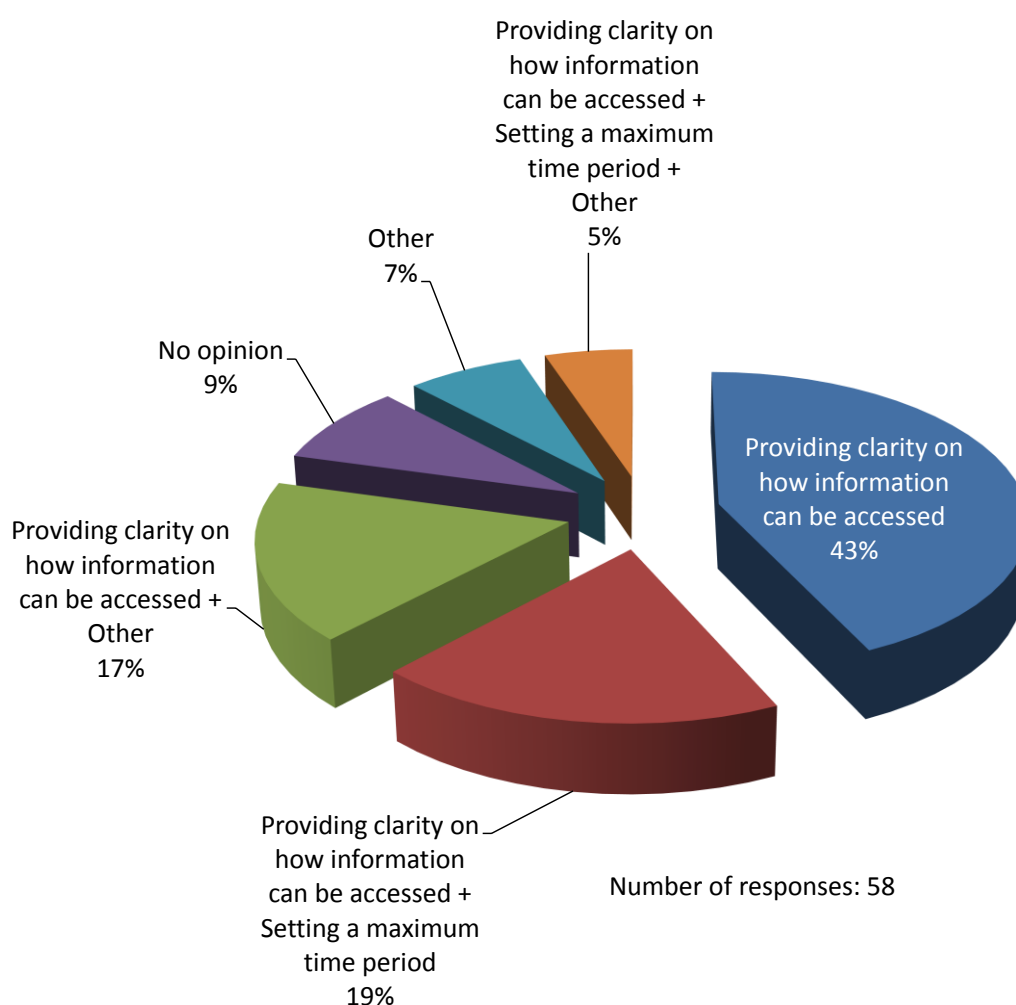


Figure 4 Answers to question 4



Q-4. Transparency to the customer should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through:	Providing clarity on how information can be accessed	Providing clarity on how information can be accessed + Setting a maximum time period	Providing clarity on how information can be accessed + Other	No opinion	Other	Providing clarity on how information can be accessed + Setting a maximum time period + Other
Aggregators	1					
Authorities			2			
Consumer Associations	1		2	2		1
DSOs / Network Operators	4	1		1		
Energy Supply Companies	8	3	1			
Industry Associations	5	5	1		2	2
Other Firms	3		2	1	1	
Standardisation Bodies				1	1	
Total	22	9	8	5	4	3

Table 10 Answers to question 4 by respondent group (excluding confidential)

Q-4. Transparency to the customer should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through:	Providing clarity on how information can be accessed	Providing clarity on how information can be accessed + Setting a maximum time period	Providing clarity on how information can be accessed + Other	No opinion	Other	Providing clarity on how information can be accessed + Setting a maximum time period + Other
Austria	1	2	1			
Belgium	1		1			
Denmark		1				
EU	2	2	1	3	1	
Finland		1				
France	3	1				
Germany	6	1	2		1	1
Italy	1	1				
Norway	1				1	
Other	1			1		
Poland	1					
Romania	1					
Slovenia			1			
Spain	1			1		
Sweden	2					1
Switzerland			1			
UK	1		1		1	1
Total	22	9	8	5	4	3

Table 11 Answers to question 4 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 4: The customer meter data which comes out of the data management processes should be transparent to the customer. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through: (a) Providing clarity on how information can be accessed; (b) Setting a maximum time period during which a customer has to wait to receive that information after having moved in to a new premises; (c) Other; and (d) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> Respondents show a strong support for transparency to be ensured by providing clarity on how information can be accessed and some suggestions of alternative approaches (more than 80%). On the other hand, there is more limited support (24%) for maximum time periods during which a customer has to wait to receive that information, and a general view that this needs <p>CEER's Proposal: Merge recommendations 3, 4, part of 5 and 10 as follows:</p> <p>The relevant body in each MS (DSO/metering operator/other) shall make the following general information on meter data management publically available, as a minimum: (a) the customer's rights with regard to customer data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; (d) how the customer and market participants authorised by the customer get access to that data; and (e) within what time period the customer and market participants authorised by the customer have to wait to get disaggregated data. This should be ensured by the NRA.</p> <p>The above general information on meter data management should, as a minimum, be published on the website of the relevant body (DSO/metering operator/other) and must be presented in a customer-friendly way.</p>		
Presentation of information by the DSO	One respondent notes that DSOs should show detailed information on its website, while the bills sent to customers should present the same information in an aggregated and comprehensive form.	Noted. It depends on the specific data management model and the information the bill should include is out of the scope of this paper.
Cost-efficiency	One respondent considers that information must be presented in a cost-efficient way (electronic format instead of paper and not too much information).	Noted. As indicated in the final recommendation, information should as a minimum be published on a website.
Only relevant information	Three respondents think that, besides from being very costly, presenting the customers with too much information can be confusing for the consumer. Therefore, they suggest defining what information is relevant to the customer, in order to find a right balance and avoid an excess of information.	Noted. Adding such specificity is out of the scope of this paper.
Information access through the supplier	Two respondents believe that, in a "supplier-centric" model, customer data should always be accessed through the electricity retailer.	Noted. The idea of publishing general information on the website of the relevant body does not mean that suppliers will not provide it to customers in the way they find more appropriate.
Both real-time and historic data	Some respondents consider that the statement should be applied to both real-time and historical data.	Noted.
Definition of maximum time period	One respondent indicates that this maximum time period should be defined specifically. Another respondent believes the need for standardised time frames should be addressed as a whole instead of for that specific case.	Noted. Adding such specificity is out of the scope of this paper.



5. The customer meter data should be transparent to a third party, to whom a customer has provided such consent. By third party we mean a party that needs customer consent to manage data, hence not a party already authorised by law and/or carrying out regulatory tasks for system operation. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through (tick one or several boxes):

- Providing the third party clarity on how information can be accessed
- Setting a maximum time period during which a third party has access to the information
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

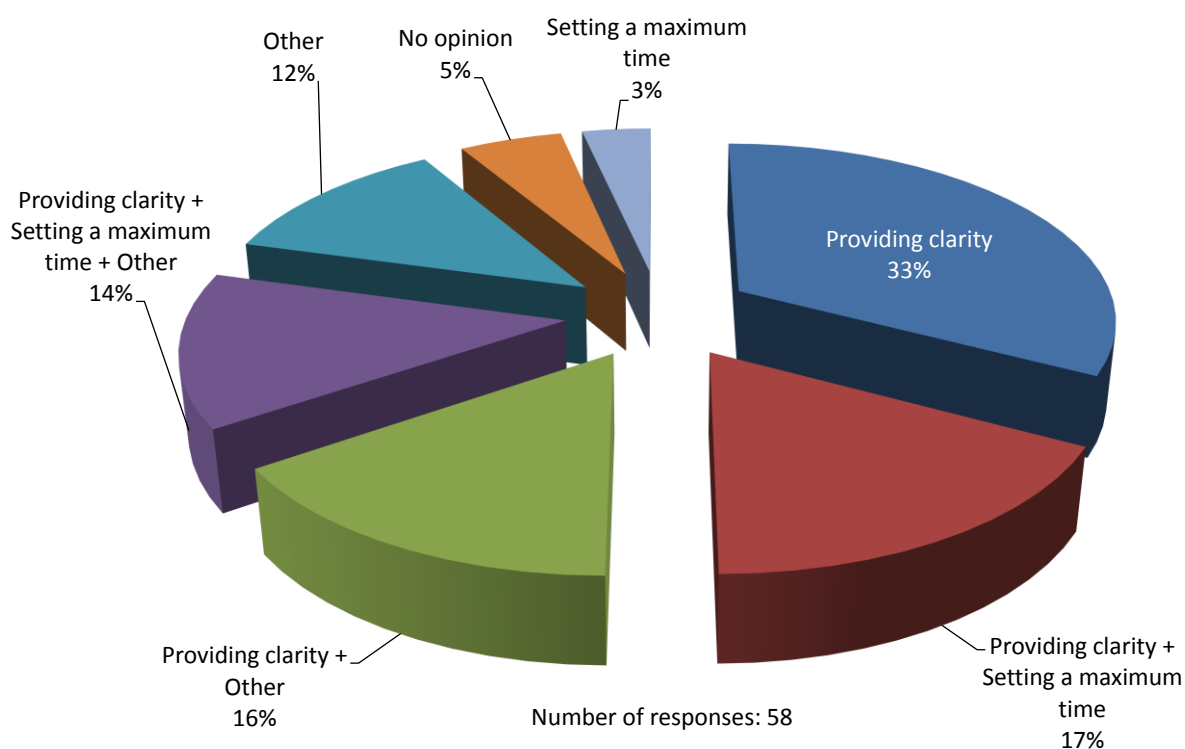


Figure 5 Answers to question 5



Q-5. Transparency to a third party should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through:	Providing clarity	Providing clarity + Setting a maximum time	Providing clarity + Other	Providing clarity + Setting a maximum time + Other	Other	No opinion	Setting a maximum time
Aggregators	1						
Authorities		1			1		
Consumer Associations	2	3				1	
DSOs / Network Operators	1	1		3		1	
Energy Supply Companies	7		1		3		1
Industry Associations	4	1	3	3	3		1
Other Firms	2	2	2	1			
Standardisation Bodies			1			1	
Total	17	8	7	7	7	3	2

Table 12 Answers to question 5 by respondent group (excluding confidential)

Q-5. Transparency to a third party should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through:	Providing clarity	Providing clarity + Setting a maximum time	Providing clarity + Other	Providing clarity + Setting a maximum time + Other	Other	No opinion	Setting a maximum time
Austria	1			2	1		
Belgium	1			1			
Denmark	1						
EU	1	2	2	1		2	1
Finland				1			
France		1		1	1		1
Germany	6	1	2		2		
Italy	1				1		
Norway	1				1		
Other	1			1			
Poland	1						
Romania	1						
Slovenia		1					
Spain					1	1	
Sweden	1		2				
Switzerland		1					
UK	1	2	1				
Total	17	8	7	7	7	3	2

Table 13 Answers to question 5 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 5: The customer meter data should be transparent to a third party, to whom a customer has provided such consent. By third party we mean a party that needs customer consent to manage data, hence not a party already authorised by law and/or carrying out regulatory tasks for system operation. Transparency should be ensured by the relevant body (NRA/DSO/metering operator/TSO/other) through: (a) Providing the third party clarity on how information can be accessed; (b) Setting a maximum time period during which a third party has access to the information; (c) Other; and (d) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> The vast majority of the respondents (around 80%) show a strong support for transparency to be ensured by providing the clarity to third parties on how information can be accessed. On the contrary, there is little qualified support (34%) for the option of setting a maximum time period during which a third party has access to the information. <p>CEER's Proposal: Merge partly with recommendations 3, 4 and 10 and merge the parts concerning accessibility with recommendation 13.</p>		
Data confidentiality	Five respondents consider that some of the information within user and contract data may be confidential, and should not be sent to any third party. Therefore, they suggest clarifying which data are concerned.	Noted. Refer to recommendations 1 and 2.
Subject to customer consent	Seven respondents note that data access by third parties should be subject to prior and explicit consent by the consumer. Moreover, historic data should be deleted if required by the consumer.	Agree with the first statement. The second statement is noted and discussed above in question 3.
Maximum time period agreed with the customer	Three respondents suggest that the maximum time period during which a third party has access to information should be agreed with the consumer, while one respondent considers that there should be no maximum time limit to access any customer data for which access was initially granted if the customer has not retracted his/her authorisation.	Agree that access to information should be agreed with the consumer.
DSO as neutral market facilitator	According to the model of the DSO as neutral market facilitator, developed by the European Commission's Smart Grids' Task Force ² , the DSO should be responsible for data management and communication to third parties.	Noted. It depends on the specific data management model.
Conditions ensured by NRA	Two respondents indicate that it is important to determine who defines the access terms and conditions and who ensures they are applied, suggesting that a legal/regulatory framework on how third parties can access customer meter data and how they can use them shall be defined by	Agree.

² The Smart Grids Task Force (SGTF) was set up by the European Commission at the end of 2009 and is made up of stakeholder representatives from industry, regulators, consumer groups and the European Commission. The mission of the SGTF is to advise the Commission on policy and regulatory directions at European level and to coordinates steps towards the implementation of smart grids under the Third Energy Package. [Smart Grid Task Force - EG3 First Year Report: Options on handling Smart Grids Data](#)



	public authorities (administration, NRA).	
Clarification of what a “third party” means	Two respondents consider there is a need for clarifying the definition of “third party”. More specifically, it should be clear if suppliers are included within this definition.	Agree. The definition of “third party” will be clarified in the final advice.

6. The relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data in order to achieve energy efficiency benefits and other potential benefits.

(a) That body or bodies should be (tick one or several boxes):

- NRA
- DSO/metering operator
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

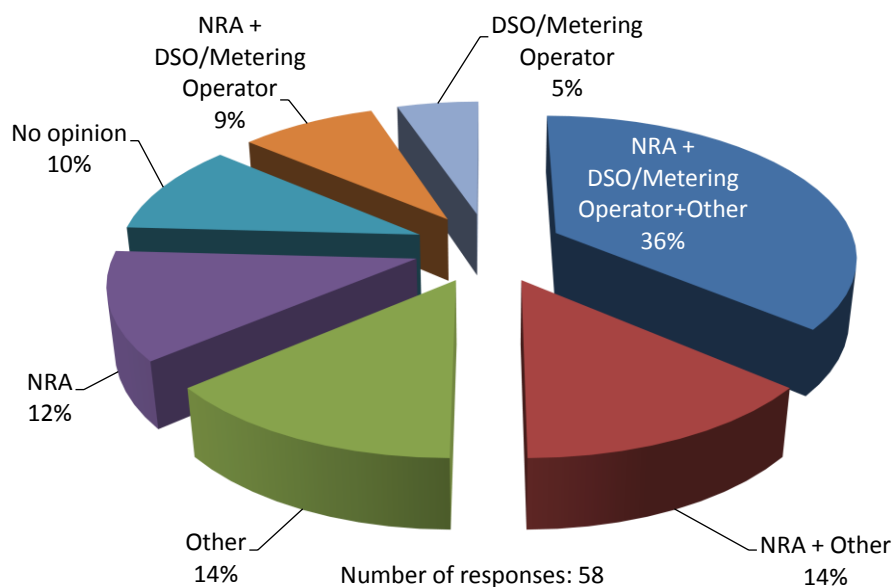


Figure 6 Answers to question 6a



Q-6a. The body or bodies in each country that should take active steps to build customer confidence in sharing customer meter data should be:	NRA + DSO/Metering Operator + Other	NRA + Other	Other	NRA	No opinion	NRA + DSO/Metering Operator	DSO/Metering Operator
Aggregators						1	
Authorities			1		1		
Consumer Associations	1	1	1	1	1	1	
DSOs / Network Operators	4	1	1				
Energy Supply Companies	6	2	1	2		1	
Industry Associations	8	2	2	1	2		
Other Firms	1	1	1	2	1		1
Standardisation Bodies		1				1	
Total	20	8	7	6	5	4	1

Table 14 Answers to question 6a by respondent group (excluding confidential)

Q-6a. The body or bodies in each country that should take active steps to build customer confidence in sharing customer meter data should be:	NRA + DSO/Metering Operator + Other	NRA + Other	Other	NRA	No opinion	NRA + DSO/Metering Operator	DSO/Metering Operator
Austria	2		1			1	
Belgium	1				1		
Denmark					1		
EU	5	2				2	
Finland	1						
France	4						
Germany		3	2	3	1	1	1
Italy	2						
Norway	1		1				
Other				1	1		
Poland	1						
Romania		1					
Slovenia					1		
Spain			2				
Sweden	2	1					
Switzerland	1						
UK		1	1	2			
Total	20	8	7	6	5	4	1

Table 15 Answers to question 6a by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 6a: The relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data in order to achieve energy efficiency benefits and other potential benefits. That body or bodies should be: (a) NRA; (b) DSO/Metering Operator; (c) Other; and (d) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> More than one third of the respondents (36%) consider that the relevant bodies that should take active steps to build customer confidence in sharing customer meter data should be the NRA, the DSO/metering operator and other parties, such as consumer organisations, suppliers and ESCOs. On the other hand, 26% indicate that this body should be just the NRA or the NRA combined with other agents, such as governments and consumer organisations. Several respondents (14%) believe that the responsible body should be other than the ones proposed in the paper. <p>CEER's Proposal: Merge recommendation 6a and recommendation 6b as follows:</p> <p>In order to achieve energy efficiency benefits and other potential benefits, the relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data. Those bodies could be the NRAs, the DSO/metering operator, public authorities and consumer organisations.</p> <p>Active steps to be taken might include information campaigns.</p>		
Consumer organisations	Many respondents suggest that consumer organisations should also be considered as bodies that should take active steps to build customer confidence in sharing customer meter data.	Agree.
Governmental bodies	Two respondents indicate that other public authorities, such as governments and ministries should also be responsible.	Agree.



(b) Active steps might include (tick one or several boxes):

- Information campaign
- Use of energy advisor
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

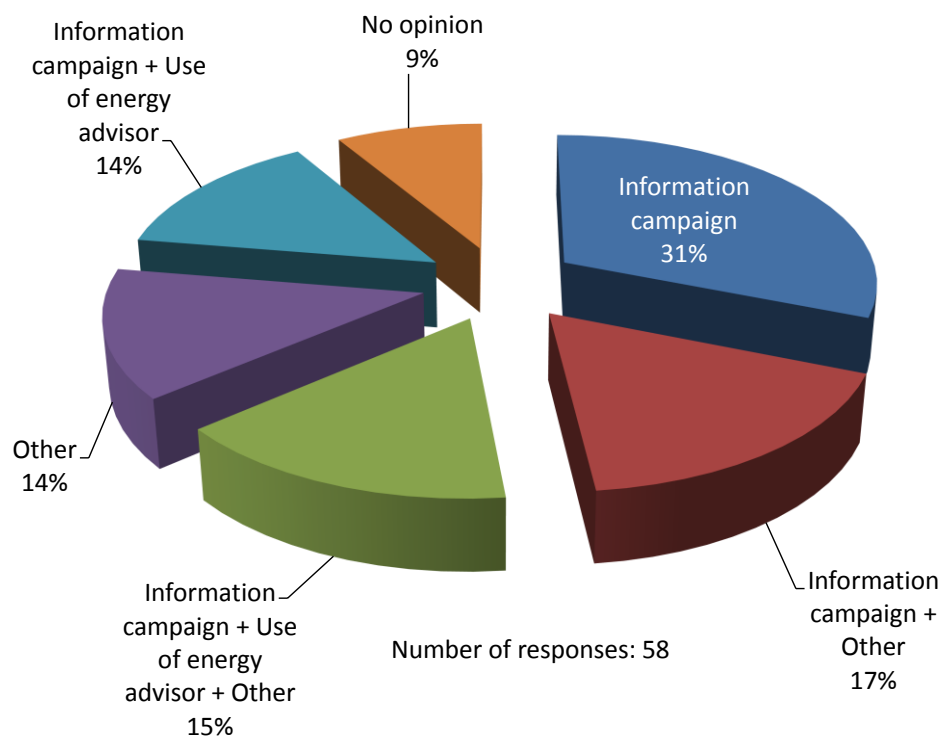


Figure 7 Answers to question 6b



Q-6b. Active steps to be taken by the relevant bodies in each country to build customer confidence in sharing customer meter data might include:	Information campaign	Information campaign + Other	Information campaign + Use of energy advisor + Other	Other	Information campaign + Use of energy advisor	No opinion
Aggregators	1					
Authorities			2			
Consumer Associations		1		1	3	1
DSOs / Network Operators	2		1	1	2	
Energy Supply Companies	5	2	2	2	1	
Industry Associations	3	5	3	2	2	
Other Firms	3	1	1	1		1
Standardisation Bodies				1		1
Total	14	9	9	8	8	3

Table 16 Answers to question 6b by respondent group (excluding confidential)

Q-6b. Active steps to be taken by the relevant bodies in each country to build customer confidence in sharing customer meter data might include:	Information campaign	Information campaign + Other	Information campaign + Use of energy advisor + Other	Other	Information campaign + Use of energy advisor	No opinion
Austria	1		1		2	
Belgium			1		1	
Denmark					1	
EU		4	1	2		2
Finland			1			
France			1	1	2	
Germany	6	1	1	3		
Italy		1	1			
Norway	2					
Other		1				1
Poland	1					
Romania					1	
Slovenia			1			
Spain	2					
Sweden	1	2				
Switzerland			1			
UK	1			2	1	
Total	14	9	9	8	8	3

Table 17 Answers to question 6b by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 6b: The relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data in order to achieve energy efficiency benefits and other potential benefits. Active steps might include: (a) Information campaigns; (b) Use of energy advisor; (c) Other; and (d) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> A vast majority of the respondents support an information campaign (31%) or an information campaign combined with other options (46%). 29% of the agents are in favour of using energy advisors, but combined with some other option at the same time. On the other hand, several respondents (14%) believe that the active steps should be other than the ones proposed in the paper. 9% of the respondents did not provide any feedback to this question. <p>CEER's Proposal: Merge recommendation 6a and recommendation 6b as follows:</p> <p>In order to achieve energy efficiency benefits and other potential benefits, the relevant bodies in each country should take active steps to build customer confidence in sharing customer meter data. Those bodies could be the NRAs, the DSO/metering operator, public authorities and consumer organisations.</p> <p>Active steps to be taken might include information campaigns.</p>		
Decision at national level	Two respondent consider that, as market roles and responsibilities are different across Member States, it should be left to the national level to define the most effective and economic tools.	Agree.
Clarification of use of energy advisor	Two respondents note that the answer "use of energy advisor" should be clarified.	Agree. This will be clarified within the final advice.
Role of institutions and NRAs	One respondent highlights that the role of institutions and NRAs should also be to ensure the enforcement of the rules, by controlling their respect and sanctioning any abuse.	Noted. This depends on the specific competences that NRAs and other institutions have in the different Member States.
Demonstration projects	One respondent mentions, as another active step, demonstration projects and initiatives aimed at testing solutions in a real environment in order to increase customers' awareness, while proving the benefits of the new systems.	Noted. In the recommendation, information campaigns and energy advisors are proposed, notwithstanding that other types of measures might be taken as well.
More information on the bill	One agent believes that providing more information on the bill should also be taken into account.	Noted.
Common information point	One respondent suggests that the services offered by means of a common information point (provided by the NRA or some other agent) would be very useful.	Noted. In the recommendation, information campaigns and energy advisors are proposed, notwithstanding that other types of measures might be taken as well.



7. There should be a common standard for data content, data formats and data exchange in the retail market.

- *Agree*
- *Disagree*
- *No opinion*

100% of respondents agreed with this question. There were 58 responses.

Q-7. There should be a common standard for data content, data formats and data exchange in the retail market:	Agree
Aggregators	1
Authorities	2
Consumer Associations	6
DSOs / Network Operators	6
Energy Supply Companies	12
Industry Associations	15
Other Firms	7
Standardisation Bodies	2
Total	51

Table 18 Answers to question 7 by respondent group (excluding confidential)



Q-7. There should be a common standard for data content, data formats and data exchange in the retail market:	Agree
Austria	4
Belgium	2
Denmark	1
EU	9
Finland	1
France	4
Germany	11
Italy	2
Norway	2
Other	2
Poland	1
Romania	1
Slovenia	1
Spain	2
Sweden	3
Switzerland	1
UK	4
Total	51

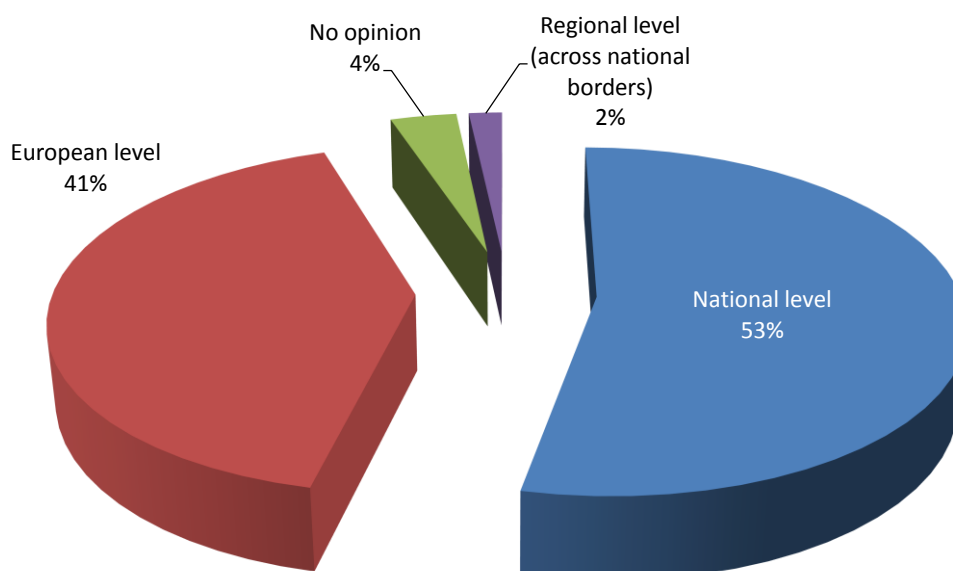
Table 19 Answers to question 7 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 7: There should be a common standard for data content, data formats and data exchange in the retail market: (a) Agree; (b) Disagree; and (c) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> Answers show a strong support for adopting a common standard, since all respondents agree with the proposed statement. <p>CEER's Proposal: Merge recommendations 7, 8, 9a and 9b as follows:</p> <p>Beyond current requirements for a national common standard for data format and exchange, we recommend MSs, or any competent authority they designate, to explore the costs and benefits of harmonising these standards at a broader geographical area, namely at regional and/or European level.</p>		

8. The common standards for data content, data formats and data exchange in the retail market should be set on (tick one box):

- *European level*
- *Regional level (across national borders)*
- *National level*
- *Sub-national level*
- *No opinion*



Number of Responses: 58

Figure 8 Answers to question 8



Q-8. The common standards for data content, data formats and data exchange in the retail market should be set on:	National level	European level	No opinion	Regional level (across national borders)
Aggregators		1		
Authorities	1	1		
Consumer Associations	1	3	2	
DSOs / Network Operators	4	1		1
Energy Supply Companies	9	3		
Industry Associations	12	3		
Other Firms	1	6		
Standardisation Bodies		2		
Total	28	20	2	1

Table 20 Answers to question 8 by respondent group (excluding confidential)

Q-8. The common standards for data content, data formats and data exchange in the retail market should be set on:	National level	European level	No opinion	Regional level (across national borders)
Austria	3	1		
Belgium	1	1		
Denmark	1			
EU	4	4	1	
Finland	1			
France	4			
Germany	7	4		
Italy	2			
Norway		2		
Other		2		
Poland	1			
Romania		1		
Slovenia		1		
Spain	1	1		
Sweden		2		1
Switzerland		1		
UK	3		1	
Total	28	20	2	1

Table 21 Answers to question 9 by respondent group (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 8: The common standards for data content, data formats and data exchange in the retail market should be set on (tick one box): (a) European level; (b) Regional level (across national borders); (c) National level; (d) Sub-national level; and (e) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> Even though the answers received show a strong support for a national level solution (53%), there is a very mixed view on the application of a common standard. Adopting a European level standard was the second most selected option with 41% of the answers. <p>CEER's Proposal: Merge recommendations 7, 8, 9a and 9b as follows:</p> <p>Beyond current requirements for a national common standard for data format and exchange, we recommend MSs, or any competent authority they designate, to explore the costs and benefits of harmonising these standards at a broader geographical area, namely at regional and/or European level.</p>		

9. (a) The data that should be standardised should as a minimum/as a starting point be (tick one or several boxes):

- Point of delivery identification data
- User and contract data
- Consumption data
- Other (please specify in the comment box below)
- No opinion

Comment box (3500 characters maximum)

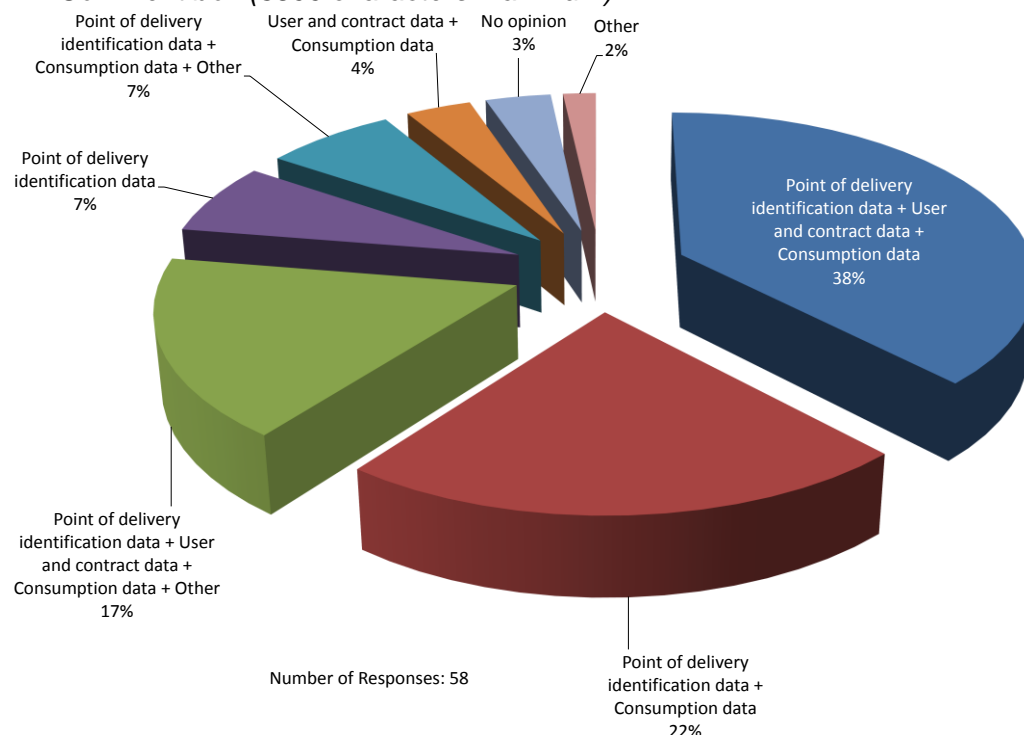


Figure 9 Answers to question 9a



Q-9a. The data that should be standardised should as a minimum/as a starting point be:	Point of delivery identification data + User and contract data + Consumption data	Point of delivery identification data + User and contract data + Consumption data + Other	Point of delivery identification data + Consumption data	Point of delivery identification data	Point of delivery identification data + Consumption data + Other	User and contract data + Consumption data	No opinion	Other
Aggregators			1					
Authorities	1		1					
Consumer Associations	4					2		
DSOs / Network Operators	2	2			1		1	
Energy Supply Companies	4	3	2	2			1	
Industry Associations	7	4	2	1	1			
Other Firms	3		3					1
Standardisation Bodies				1	1			
Total	21	9	9	4	3	2	2	1

Table 22 Answers to question 9a by respondent group (excluding confidential)

Q-9a. The data that should be standardised should as a minimum/as a starting point be:	Point of delivery identification data + User and contract data + Consumption data	Point of delivery identification data + User and contract data + Consumption data + Other	Point of delivery identification data + Consumption data	Point of delivery identification data	Point of delivery identification data + Consumption data + Other	User and contract data + Consumption data	No opinion	Other
Austria	1		2		1			
Belgium	2							
Denmark				1				
EU	5	1		1	1	1		
Finland		1						
France		3		1				
Germany	6	1	4					
Italy			1	1				
Norway	1				1			
Other	1		1					
Poland		1						
Romania	1							
Slovenia			1					
Spain	2							
Sweden		2					1	
Switzerland	1							
UK	1					1	1	1
Total	21	9	9	4	3	2	2	1

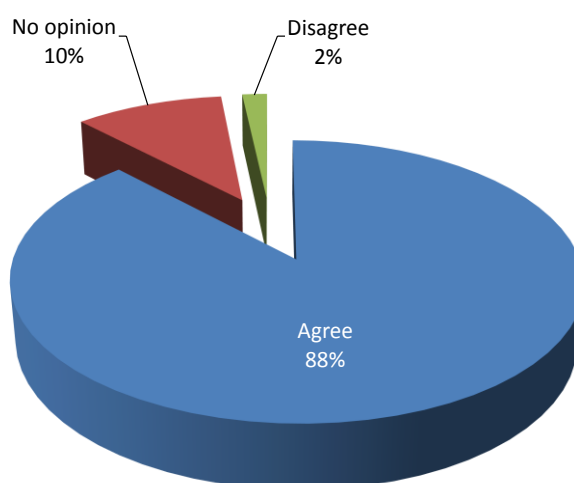
Table 23 Answers to question 9a by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 9a: The data that should be standardised should as a minimum/as a starting point be (tick one or several boxes): (a) Point of delivery identification data; (b) User and contract data; (c) Consumption data; (d) Other; and (e) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> Even though there is a very mixed view, the majority of respondents support standardising point of delivery identification data, user and contract data, and consumption data, along with other types of data (55%). Around 36% do not consider that user and contract data should be standardised. <p>CEER's Proposal: Merge recommendations 7, 8, 9a and 9b as follows: Beyond current requirements for a national common standard for data format and exchange, we recommend MSs, or any competent authority they designate, to explore the costs and benefits of harmonising these standards at a broader geographical area, namely at regional and/or European level.</p>		
Not applicable to user and contract data	Several respondents note that this type of data is only relevant for the supplier and the customer and, thus, it should not be subject to standardisation since it should not be accessible to any other parties.	Noted. Whether user and contract data is accessible to other parties or not should be subject to the consumer's consent.
Other data categories	Some respondents consider that other data categories, apart from the ones suggested in the advice paper, should also be standardised (i.e. technical data, energy efficiency data).	Noted. Other data categories are out of the scope of this paper.

(b) NRAs should ensure that appropriate arrangements are in place for the development of common standards for data content, data format and data exchange and monitoring of compliance.

- Agree
- Disagree
- No opinion



Number of Responses: 58

Figure 10 Answers to question 9b



Q-9b. NRAs should ensure that appropriate arrangements are in place for the development of common standards for data content, data format and data exchange and monitoring of compliance:	Agree	No opinion	Disagree
Aggregators	1		
Authorities	2		
Consumer Associations	6		
DSOs / Network Operators	4	2	
Energy Supply Companies	10	1	1
Industry Associations	14	1	
Other Firms	5	2	
Standardisation Bodies	2		
Total	44	6	1

Table 24 Answers to question 9b by respondent group (excluding confidential)



Q-9b. NRAs should ensure that appropriate arrangements are in place for the development of common standards for data content, data format and data exchange and monitoring of compliance:	Agree	No opinion	Disagree
Austria	4		
Belgium	2		
Denmark	1		
EU	9		
Finland	1		
France	3	1	
Germany	10	1	
Italy	2		
Norway	2		
Other	1	1	
Poland	1		
Romania	1		
Slovenia	1		
Spain	2		
Sweden	1	2	
Switzerland		1	
UK	3		1
Total	44	6	1

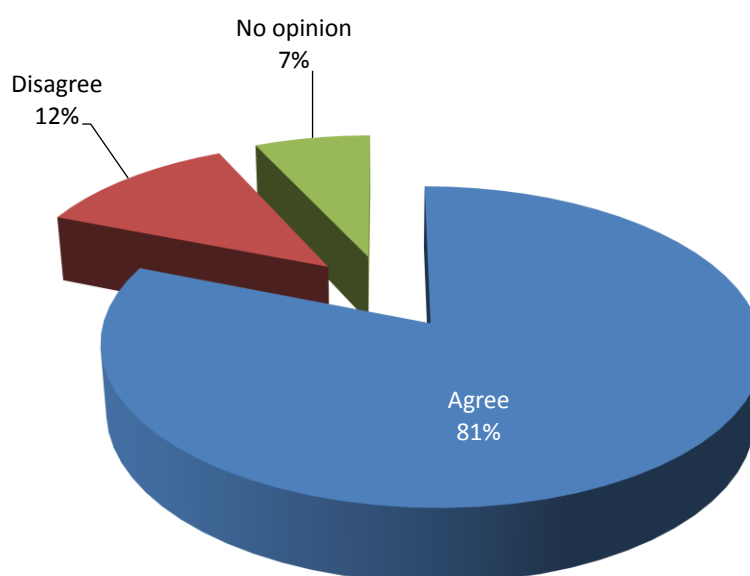
Table 25 Answers to question 9b by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 9b: NRAs should ensure that appropriate arrangements are in place for the development of common standards for data content, data format and data exchange and monitoring of compliance: (a) Agree; (b) Disagree; and (c) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> There is almost unanimous support for common standards for data content, data format and data exchange and monitoring of compliance. 10% of the respondents did not provide any comments. <p>CEER's Proposal: Merge recommendations 7, 8, 9a and 9b as follows:</p> <p>Beyond current requirements for a national common standard for data format and exchange, we recommend MSs, or any competent authority they designate, to explore the costs and benefits of harmonising these standards at a broader geographical area, namely at regional and/or European level.</p>		

10. The general information on meter data management (as specified in draft recommendation 3) should as a minimum be published on the website of the relevant body (NRA/DSO/metering operator/TSO/other), and must be presented in a customer-friendly way.

- Agree
- Disagree
- No opinion



Number of Responses: 58

Figure 11 Answers to question 10



Q-10. The general information on meter data management should as a minimum be published on the website of the relevant body (NRA/DSO/metering operator/TSO/other), and must be presented in a customer-friendly way:	Agree	No opinion	Disagree
Aggregators	1		
Authorities	2		
Consumer Associations	4	1	1
DSOs / Network Operators	5	1	
Energy Supply Companies	10	1	1
Industry Associations	11	3	1
Other Firms	7		
Standardisation Bodies		1	1
Total	40	7	4

Table 26 Answers to question 10 by respondent group (excluding confidential)



Q-10. The general information on meter data management should as a minimum be published on the website of the relevant body (NRA/DSO/metering operator/TSO/other), and must be presented in a customer-friendly way:	Agree	No opinion	Disagree
Austria	4		
Belgium	2		
Denmark		1	
EU	5	2	2
Finland		1	
France	4		
Germany	8	1	2
Italy	2		
Norway	2		
Other	2		
Poland	1		
Romania	1		
Slovenia	1		
Spain	2		
Sweden	2	1	
Switzerland	1		
UK	3	1	
Total	40	7	4

Table 27 Answers to question 10 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 10: The general information on meter data management (as specified in draft recommendation 3) should as a minimum be published on the website of the relevant body (NRA/DSO/metering operator/TSO/other), and must be presented in a customer-friendly way: (a) Agree; (b) Disagree; and (c) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> A vast majority of the respondents (81%) agree with the proposed statement, while 12% disagree. 7% of the respondents did not provide any comments. <p>CEER's Proposal: Merge recommendations 3, 4, part of 5 and 10 as follows:</p> <p>The relevant body in each MS (DSO/metering operator/other) shall make the following general information on meter data management publically available, as a minimum: (a) the customer's rights with regard to customer data management; (b) what type of customer meter data exists and what it is used for; (c) how customer meter data is stored and for how long; (d) how the customer and market participants authorised by the customer get access to that data; and (e) within what time period the customer and market participants authorised by the customer have to wait to get disaggregated data. This should be ensured by the NRA.</p> <p>The above general information on meter data management should, as a minimum, be published on the website of the relevant body (DSO/metering operator/other) and must be presented in a customer-friendly way.</p>		



Accuracy

11. *Relevant bodies (NRA/DSO/metering operator/TSO/other) should have in place standardised measures available to the customer to enable any remaining inaccuracy concerning data management to be addressed. Those measures should include a timetable set out in (tick one box):*

- *Legislation/regulation*
- *Contract*
- *Code of conduct*
- *Other (please specify in the comment box below)*
- *No need for standardisation processes for remaining inaccuracy*
- *No opinion*

Comment box (3500 characters maximum)

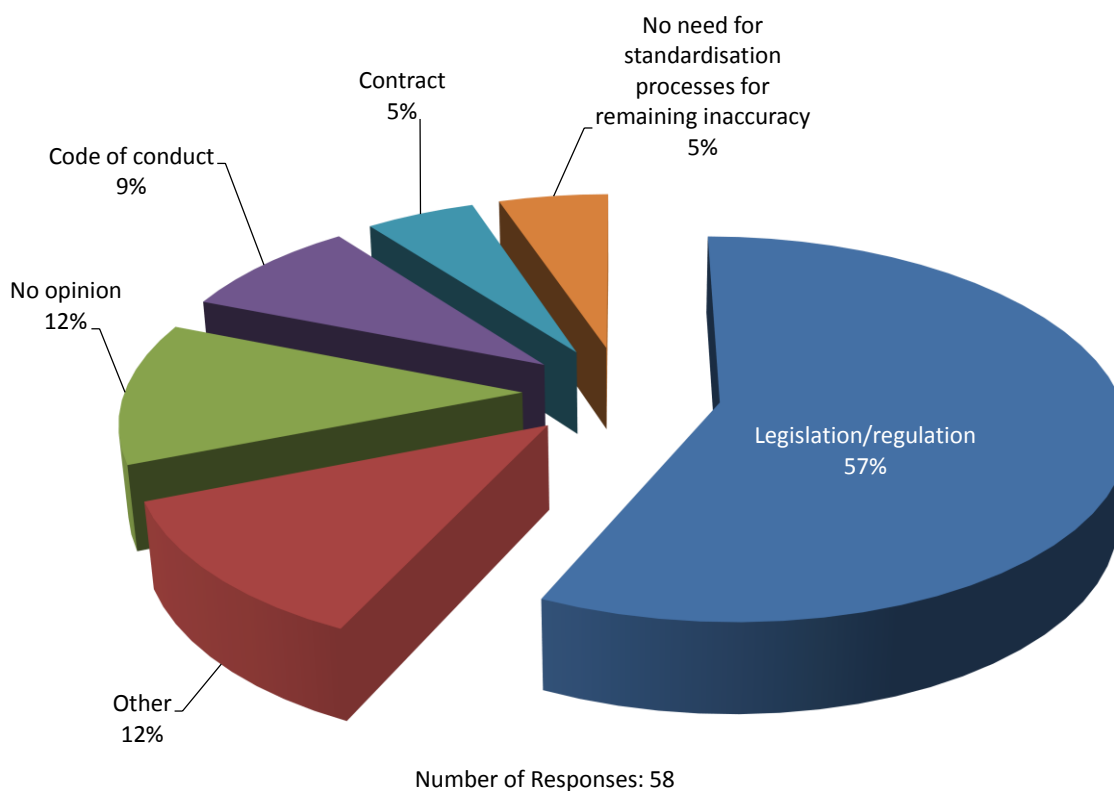


Figure 12 Answers to question 11



Q-11. Relevant bodies (NRA/DSO/metering operator/TSO/other) should have in place standardised measures available to the customer to enable any remaining inaccuracy concerning data management to be addressed. Those measures should include a timetable set out in:	Legislation / regulation	No opinion	Other	Code of conduct	Contract	No need for standardisation processes for remaining inaccuracy
Aggregators		1				
Authorities	2					
Consumer Associations	2	2		1		1
DSOs / Network Operators	2		2	2		
Energy Supply Companies	9		1			2
Industry Associations	10	2	1	1	1	
Other Firms	3		1	1	2	
Standardisation Bodies	1	1				
Total	29	6	5	5	3	3

Table 28 Answers to question 11 by respondent group (excluding confidential)

Q-11. Relevant bodies (NRA/DSO/metering operator/TSO/other) should have in place standardised measures available to the customer to enable any remaining inaccuracy concerning data management to be addressed. Those measures should include a timetable set out in:	Legislation / regulation	No opinion	Other	Code of conduct	Contract	No need for standardisation processes for remaining inaccuracy
Austria	1	1		2		
Belgium	1		1			
Denmark		1				
EU	4	3	1		1	
Finland	1					
France	2		2			
Germany	11					
Italy	1					1
Norway	2					
Other				1	1	
Poland	1					
Romania				1		
Slovenia	1					
Spain	2					
Sweden	1	1		1		
Switzerland					1	
UK	1		1			2
Total	29	6	5	5	3	3

Table 29 Answers to question 11 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 11: Relevant bodies (NRA/DSO/metering operator/TSO/other) should have in place standardised measures available to the customer to enable any remaining inaccuracy concerning data management to be addressed. Those measures should include a timetable set out in (tick one box): (a) Legislation/regulation; (b) Contract; (c) Code of conduct; (d) Other; (e) No need for standardisation processes for remaining inaccuracy; and (f) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> The vast majority (57%) support the use of legislation/regulation in order to set out a timetable of the measures in place to enable any remaining inaccuracy concerning data management to be addressed, while only 9% support the use of a code of conduct instead. 12% of the respondents do not provide any feedback in response to this question. <p>CEER's Proposal:</p> <p>The relevant body (DSO/metering operator/other) should communicate to the customer any inaccuracies that might have taken place in relation with customer meter data and how these inaccuracies have been addressed (e.g. loss of meter data leading to an estimation of consumption in the bill). The NRA should ensure that measures for addressing these inaccuracies are established in legislation/regulation.</p>		
Measures already in place	Several respondents note that measures to be applied in order to deal with data inaccuracies are already in place in the legislation of their respective countries.	Noted. This recommendation would be focused on those Member States where these requirements are not in place yet.
Equal treatment	Some respondents believe that if the regulator/legislator ensures that these measures are developed, then equal treatment of inaccuracies would be guaranteed.	Agree.
Definition of timelines	One respondent considers that defining some rules on the timelines for addressing and solving data inaccuracies once a metering error has been detected could be necessary.	Noted. Adding such specificity is out of the scope of this paper.



Accessibility

12. *The customer (or party acting on behalf of the customer) should have easy access to his/her customer meter data. This information should be made available in a way that is standardised and through a channel of the customer's choosing (web, paper, etc.). The common standards for provision to customer of meter data information should be provided at (tick one box):*

- *European level*
- *Regional level (across national borders)*
- *National level*
- *Sub-national level*
- *No need to standardise customer meter data*
- *No opinion*

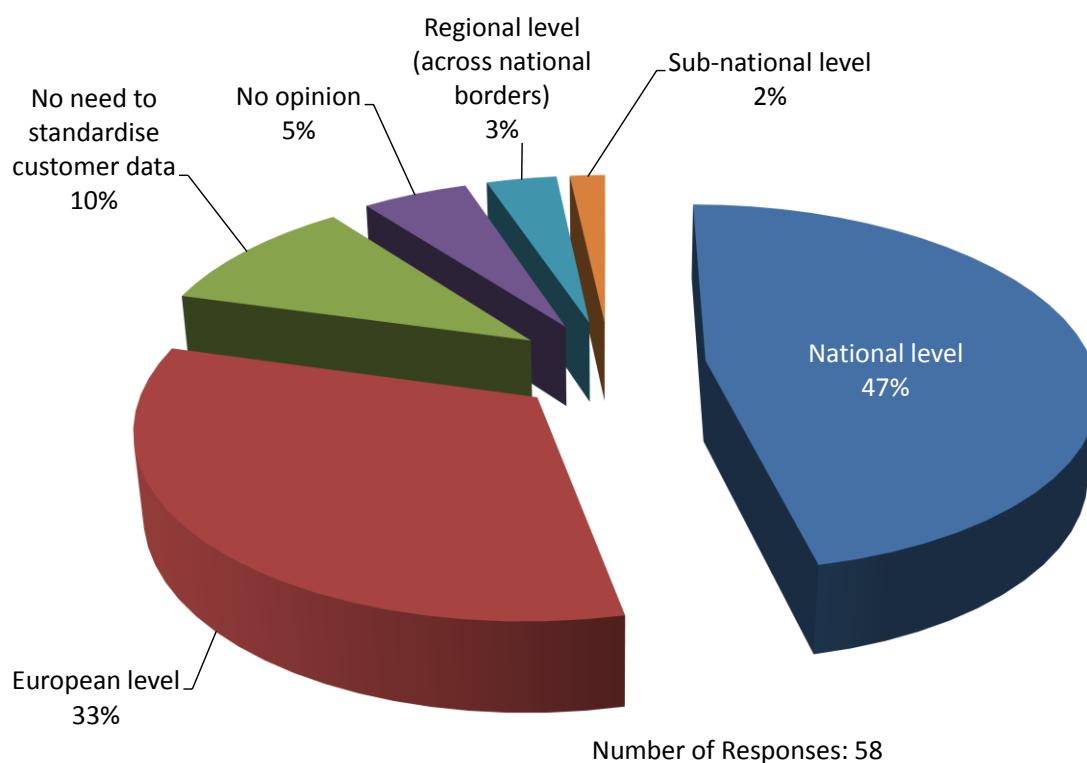


Figure 13 Answers to question 13



Q-12. The customer should have easy access to his/her customer meter data in a way that is standardised and through a channel of the customer's choosing (web, paper, etc.). The common standards for provision to customer of meter data information should be provided at:	National level	European level	No need to standardise customer data	No opinion	Regional level (across national borders)	Sub-national level
Aggregators		1				
Authorities	2					
Consumer Associations	1	4		1		
DSOs / Network Operators	3	1	1			1
Energy Supply Companies	6	2	3		1	
Industry Associations	11	2		1	1	
Other Firms	2	5				
Standardisation Bodies		1		1		
Total	25	16	4	3	2	1

Table 30 Answers to question 12 by respondent group (excluding confidential)

Q-12. The customer should have easy access to his/her customer meter data in a way that is standardised and through a channel of the customer's choosing (web, paper, etc.). The common standards for provision to customer of meter data information should be provided at:	National level	European level	No need to standardise customer data	No opinion	Regional level (across national borders)	Sub-national level
Austria	3	1				
Belgium		1				1
Denmark	1					
EU	3	4		1	1	
Finland	1					
France	2		2			
Germany	8	3				
Italy			2			
Norway	1	1				
Other		2				
Poland	1					
Romania		1				
Slovenia	1					
Spain		1		1		
Sweden	1	1			1	
Switzerland		1				
UK	3			1		
Total	25	16	4	3	2	1

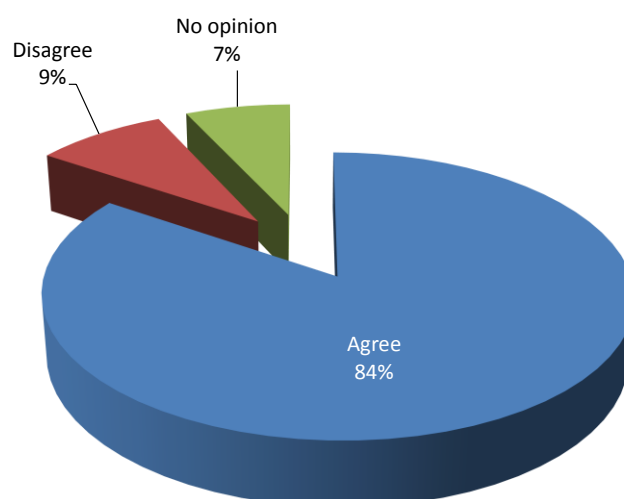
Table 31 Answers to question 12 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 12: The customer (or party acting on behalf of the customer) should have easy access to his/her customer meter data. This information should be made available in a way that is standardised and through a channel of the customer's choosing (web, paper, etc.). The common standards for provision to customer of meter data information should be provided at (tick one box): (a) European level; (b) Regional level (across national borders); (c) National level; (d) Sub-national level; (e) No need to standardise customer meter data; and (f) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> There is a very mixed view between standardisation at a national (47%) or European level (33%). 10% of the respondents consider there is no need to standardise customer meter data. <p>CEER's Proposal:</p> <p>The customer (or a market participant acting on behalf of the customer) should have easy access to customer meter data. This information should, where reasonable, be made available through an adequate channel of the customer's choosing (e.g. an in-home system or by means of a gateway).</p>		
Lack of differentiation may hinder competition	Several suppliers note that standardising the way information is presented to customers may hinder differentiation and, thus, effective competition between energy suppliers.	Agree. This comment has been taken into account in the final advice.

13. *The arrangements for accessing customer meter data should be proportionate. Subject to customer choice, access should only be provided to a party where it requires that particular customer meter data (not just any data) and where they can use it to deliver wider benefits, including to customers.*

- Agree
- Disagree
- No opinion



Number of Responses: 58

Figure 14 Answers to question 13



Q-13. The arrangements for accessing customer meter data should be proportionate. Subject to customer choice, access should only be provided to a party where it requires that particular customer meter data (not just any data) and where they can use it to deliver wider benefits, including to customers:	Agree	Disagree	No opinion
Aggregators	1		
Authorities	2		
Consumer Associations	4	1	1
DSOs / Network Operators	4	1	1
Energy Supply Companies	11		1
Industry Associations	14	1	
Other Firms	6	1	
Standardisation Bodies		1	1
Total	42	5	4

Table 32 Answers to question 13 by respondent group (excluding confidential)



Q-13. The arrangements for accessing customer meter data should be proportionate. Subject to customer choice, access should only be provided to a party where it requires that particular customer meter data (not just any data) and where they can use it to deliver wider benefits, including to customers:	Agree	Disagree	No opinion
Austria	4		
Belgium	2		
Denmark	1		
EU	6	1	2
Finland	1		
France	4		
Germany	10	1	
Italy	1		1
Norway	2		
Other	1	1	
Poland	1		
Romania	1		
Slovenia	1		
Spain	1	1	
Sweden	2		1
Switzerland	1		
UK	3	1	
Total	42	5	4

Table 33 Answers to figure 13 by country of origin (excluding confidential)

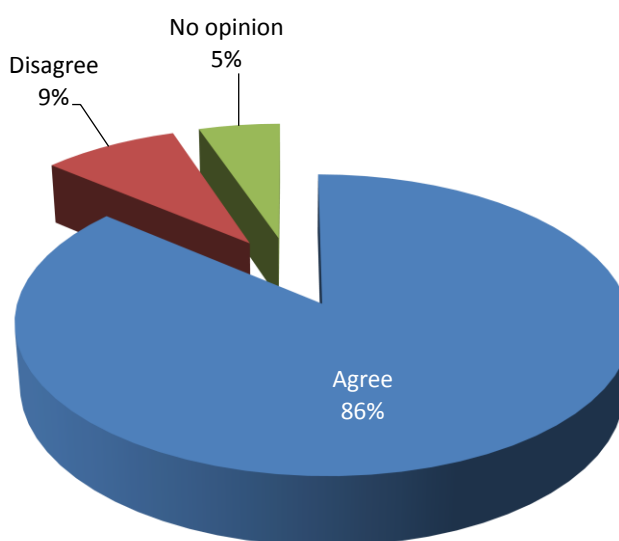


Question/issue	Respondent's feedback	CEER's position
<p>Question 13: The arrangements for accessing customer meter data should be proportionate. Subject to customer choice, access should only be provided to a party where it requires that particular customer meter data (not just any data) and where they can use it to deliver wider benefits, including to customers: (a) Agree; (b) Disagree; and (c) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> The responses show a very strong support (84%) for proportionate access to data. 9% of the respondents disagree with the proposed statement. <p>CEER's Proposal: Merge recommendation 13 with those parts of recommendation 5 concerning accessibility as follows:</p> <p>The customer (or a market participant acting on behalf of the customer) should have easy access to customer meter data. This information should, where reasonable, be made available through an adequate channel of the customer's choosing (e.g. an in-home system or by means of a gateway).</p>		

Non-discrimination

14. *To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. Specifically in relation to smart meters, there should be non-discriminatory access to information if and where smart meters are installed.*

- Agree
- Disagree
- No opinion



Number of Responses: 58

Figure 15 Answers to question 14



Q-14. To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. Specifically in relation to smart meters, there should be non-discriminatory access to information if and where smart meters are installed:	Agree	Disagree	No opinion
Aggregators	1		
Authorities	2		
Consumer Associations	4	1	1
DSOs / Network Operators	6		
Energy Supply Companies	12		
Industry Associations	12	2	1
Other Firms	5	1	1
Standardisation Bodies	2		
Total	44	4	3

Table 34 Answers to question 14 by respondent group (excluding confidential)



Q-14. To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. Specifically in relation to smart meters, there should be non-discriminatory access to information if and where smart meters are installed:	Agree	Disagree	No opinion
Austria	4		
Belgium	2		
Denmark	1		
EU	8		1
Finland	1		
France	4		
Germany	7	2	2
Italy	2		
Norway	1	1	
Other	2		
Poland	1		
Romania	1		
Slovenia	1		
Spain	2		
Sweden	3		
Switzerland	1		
UK	3	1	
Total	44	4	3

Table 35 Answers to question 14 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Question 14: To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. Specifically in relation to smart meters, there should be non-discriminatory access to information if and where smart meters are installed: (a) Agree; (b) Disagree; and (c) No opinion.</p> <p>Overview:</p> <ul style="list-style-type: none"> • There is a strong support for the application of non-discriminatory access to information, since the vast majority of the respondents (86%) agree with the previous statement. • On the other hand, 9% of the respondents disagree with the proposed statement and 5% did not provide any comments. <p>CEER's Proposal:</p> <p>To support an effective and competitive market, the data management model should not give undue preference to one stakeholder over another. This is especially important in relation to DSO-led smart meters roll-outs; there should be non-discriminatory access to information when and where such meters are installed.</p>		



Further questions for public consultation

FQ1. Do you agree with the list of relevant stakeholders we have identified in **Section 5.1** of the paper? If not, which other stakeholders do you think should be included and why?

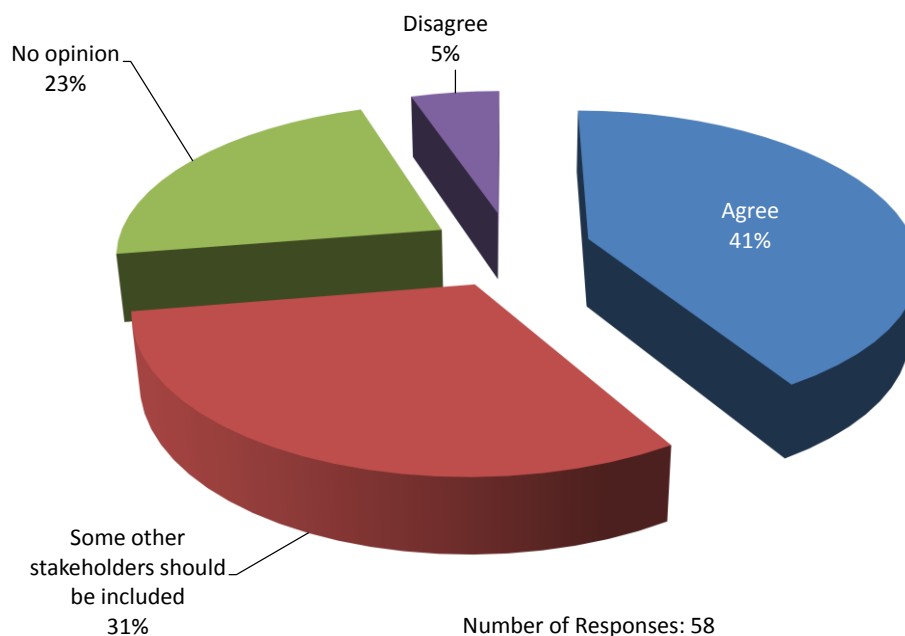


Figure 16 Answers to additional question FQ1

FQ-1. Do you agree with the list of relevant stakeholders we have identified in Section 5.1 of the paper? If not, which other stakeholders do you think should be included and why?	Agree	Some other stakeholders should be included	No opinion	Disagree
Aggregators			1	
Authorities	1	1		
Consumer Associations	1	3	2	
DSOs / Network Operators	2	3		1
Energy Supply Companies	8	3	1	
Industry Associations	5	5	3	2
Other Firms	3	1	3	
Standardisation Bodies		1	1	
Total	20	17	11	3

Table 36 Answers to additional question FQ1 by respondent group (excluding confidential)



FQ-1. Do you agree with the list of relevant stakeholders we have identified in Section 5.1 of the paper? If not, which other stakeholders do you think should be included and why?	Agree	Some other stakeholders should be included	No opinion	Disagree
Austria		1	1	2
Belgium	1	1		
Denmark			1	
EU	4	3	2	
Finland		1		
France	1	3		
Germany	6	3	2	
Italy	1	1		
Norway			1	1
Other	1		1	
Poland	1			
Romania			1	
Slovenia	1			
Spain	1	1		
Sweden	1	1	1	
Switzerland	1			
UK	1	2	1	
Total	20	17	11	3

Table 37 Answers to additional question FQ1 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Further Question 1: Do you agree with the list of relevant stakeholders we have identified in Section 5.1 of the paper? If not, which other stakeholders do you think should be included and why?</p> <p>Overview:</p> <ul style="list-style-type: none"> The majority of the respondents (72%) consider that the right stakeholders have been identified. However, 31% of respondents consider that some other stakeholders should also be included in the list. On the other hand, there are some agents (5%) who disagree with the suggested list of stakeholders (because they consider that some important agents are missing), and a significant number (23%), who did not provide any feedback to this question. <p>CEER's Proposal: The list of relevant stakeholders related to customer data management includes customers, suppliers, DSOs/metering operators, Third Party Intermediaries (TPIs), and National Regulatory Authorities (NRAs).</p>		
TSOs	Nine respondents note that TSOs are missing in the proposed list of stakeholders.	Noted. The scope of this document is focused on domestic customers.
Balance responsible parties	Six respondents say that balance responsible parties should also be included in the list, since they have clear roles in the market.	Noted. Not relevant from the customer's point of view.
Ombudsman and consumer associations	Several respondents consider that a mention to the Ombudsman, consumer associations, and organisations with an official role in handling customer complaints should be added, since they need to access customer information in order to perform their tasks.	Noted. They could access customer meter data subject to customers' consent.
Differentiate DSOs and metering operators	One respondent argues that DSOs and metering operators are different stakeholders and should be distinguished as such.	Noted. They have been considered within the same group because, regarding meter data collection, they usually perform similar functions.
Differentiate network owners and operators	One respondent believes it is important to distinguish between network owners and network operators.	Noted.
Central hubs	One respondent notes that markets are moving towards data-hub models, so that CEER should give more prominence to "central hubs".	Disagree. This document is neutral regarding the selected data management model.
Microgenerators	One respondent recommends including independent customers and micro-generators.	Agree. They are already included as a stakeholder within customers, but that will be clarified in the final advice.
Aggregators and EV rechargers	One respondent says that aggregators and EV rechargers should be included.	Agree. They are already included as a stakeholder within energy service companies, but that will be clarified in the final advice.
ESCOs' definition	One respondent suggests specifying what is meant by "ESCOs".	Agree. The definition of "third party" will be clarified in the final advice.



FQ2. Do you agree that we have correctly identified the right categories of data – defined as ‘customer meter data’ – in **Section 4.2** of the paper, as being relevant to retail market functioning and thus within the scope of our draft advice?

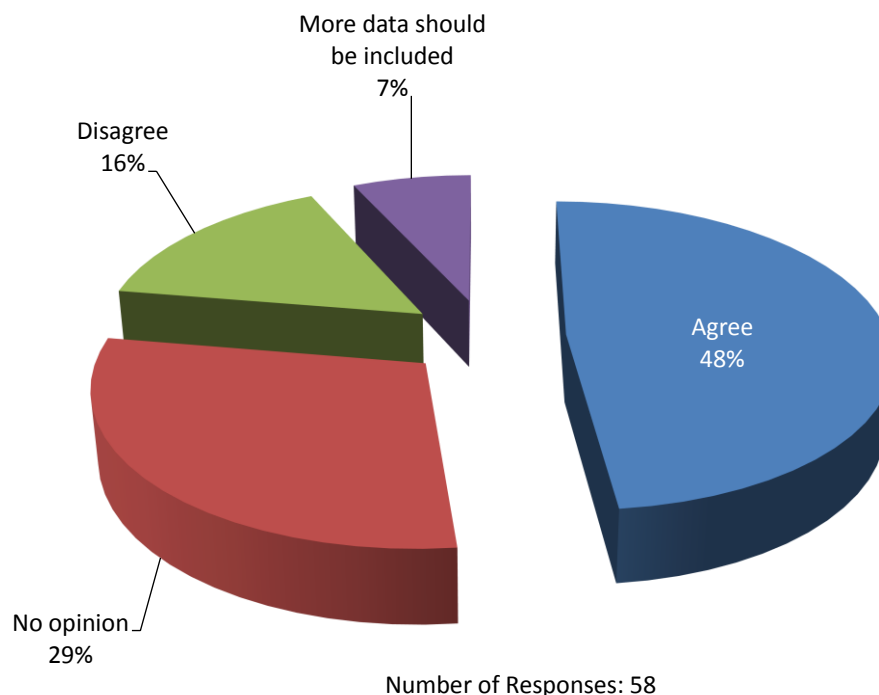


Figure 17 Answers to additional question FQ2

FQ-2. Do you agree that we have correctly identified the right categories of data – defined as ‘customer meter data’ – in Section 4.2 of the paper, as being relevant to retail market functioning and thus within the scope of our draft advice?	Agree	No opinion	Disagree	More data should be included
Aggregators		1		
Authorities	1		1	
Consumer Associations	2	4		
DSOs / Network Operators	3		2	1
Energy Supply Companies	7	2	1	2
Industry Associations	8	4	3	
Other Firms	3	4		
Standardisation Bodies	1	1		
Total	25	16	7	3

Table 38 Answers to additional question FQ2 by respondent group (excluding confidential)



FQ-2. Do you agree that we have correctly identified the right categories of data – defined as ‘customer meter data’ – in Section 4.2 of the paper, as being relevant to retail market functioning and thus within the scope of our draft advice?	Agree	No opinion	Disagree	More data should be included
Austria		1	3	
Belgium	2			
Denmark		1		
EU	5	3	1	
Finland	1			
France	2		1	1
Germany	7	3	1	
Italy	1			1
Norway		2		
Other	1	1		
Poland				1
Romania		1		
Slovenia	1			
Spain	2			
Sweden	1	1	1	
Switzerland		1		
UK	2	2		
Total	25	16	7	3

Table 39 Answers to additional question FQ2 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Further Question 2: Do you agree that we have correctly identified the right <u>categories of data</u> – defined as 'customer meter data' – in Section 4.2 of the paper, as being relevant to retail market functioning and thus within the scope of our draft advice?</p> <p>Overview:</p> <ul style="list-style-type: none"> The majority of the respondents (55%) consider that the right categories of data have been correctly identified. However, 7% of respondents consider that some other types of data should also be included in the list. On the other hand, there are some agents (16%) who disagree with the suggested list of stakeholders (because they consider that some important types of data), and a significant number (29%), who did not provide any feedback to this question. <p>CEER's Proposal: Customer meter data includes the following categories of data: point of delivery identification data, user and contract data, and net consumption data.</p>		
Contract data confidentiality	Six parties note that contract data should be confidential and it needs to be excluded from CEER definition "user and contract data" so as not to be accessible by any third parties.	Noted. All data included within customer meter data is in fact confidential. Moreover, as recommendation 1 states, the possibility to allow access to this data should be ensured by legislation/regulation.
Energy efficiency data	One respondent considers that energy efficiency data should also be made available.	Noted. It is not clear what is meant by "energy efficiency" data.
Differentiate data flows	One respondent argues that a differentiation between data flows should be made (data flow between DSOs and suppliers vs. data flow between suppliers and customers), because standardisation of the way to communicate consumption data to customers would hinder competition among suppliers.	Noted. This advice suggests recommendations on customer data management always under a customer perspective. Agree. Regarding the standardisation of the way to communicate data to customers, this comment has been taken into account in the final advice.
Different data treatment	One respondent indicates that, since data can be used in different forms (aggregated, validated, real time, etc.) and can have different usages (billing, information, comparison, energy services, etc.), the same piece of information should have different privacy levels depending on its final usage.	Noted. Adding such specificity is out of the scope of this paper.
Decentralised production data	One respondent note that they would also include decentralised production data.	Agree. This data is already included as consumption data, but it will be clarified in the final advice.



FQ3. *In relation to the 5 proposed guiding principles?*

a) *Do you agree with the proposed guiding principles in **Chapter 8** of the paper? Should any be added or removed?*

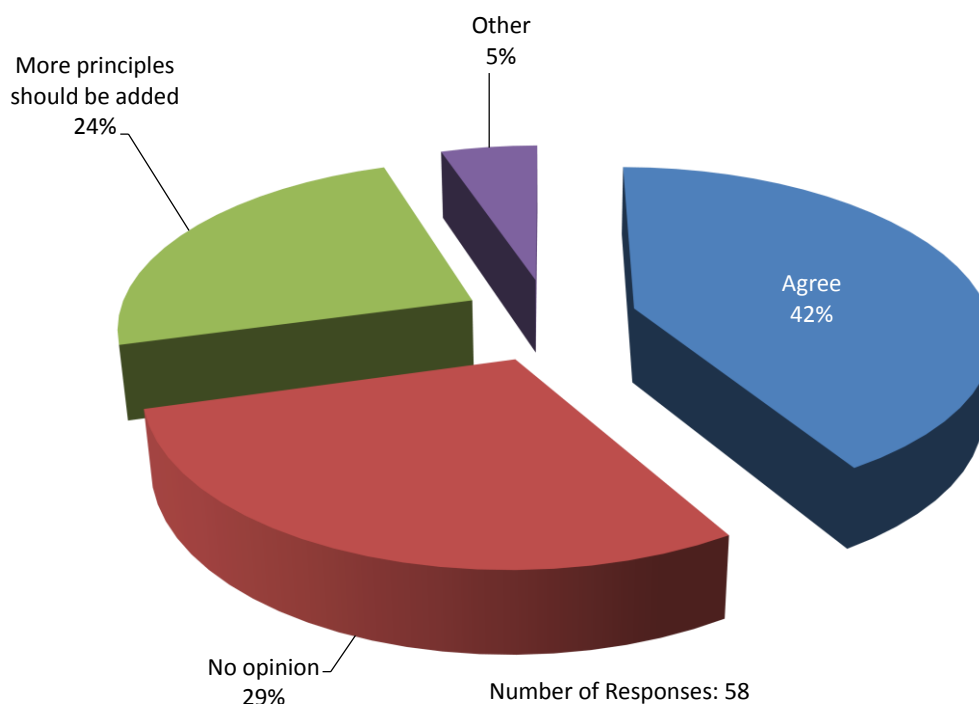


Figure 18 Answers to additional question FQ3a

FQ-3a. In relation to the 5 proposed guiding principles, do you agree with the proposed guiding principles in Chapter 8 of the paper? Should any be added or removed?	Agree	No opinion	More principles should be added	Other
Aggregators		1		
Authorities	1	1		
Consumer Associations	2	2	2	
DSOs / Network Operators	4			2
Energy Supply Companies	4	3	5	
Industry Associations	8	2	5	
Other Firms	2	4	1	
Standardisation Bodies		1	1	
Total	21	14	14	2

Table 40 Answers to additional question FQ3a by respondent group (excluding confidential)



FQ-3a. In relation to the 5 proposed guiding principles, do you agree with the proposed guiding principles in Chapter 8 of the paper? Should any be added or removed?	Agree	No opinion	More principles should be added	Other
Austria	2	2		
Belgium	2			
Denmark		1		
EU	3	2	4	
Finland	1			
France	3		1	
Germany	3	2	6	
Italy		1	1	
Norway	1	1		
Other		1	1	
Poland	1			
Romania		1		
Slovenia	1			
Spain	1			1
Sweden	1	1		1
Switzerland		1		
UK	2	1	1	
Total	21	14	14	2

Table 41 Answers to additional question FQ3b by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Further Question 3a: In relation to the 5 proposed guiding principles, do you agree with the proposed <u>guiding principles</u> in Chapter 8 of the paper? Should any be added or removed?</p> <p>Overview:</p> <ul style="list-style-type: none"> The majority of the respondents (66%) show strong support for the proposed guiding principles. However, nearly a quarter of respondents (24%) consider that some other guiding principles should also be taken into account. A significant number of respondents (29%) did not provide any comments. <p>CEER's Proposal: The guiding principles underlying customer data management are privacy and security, transparency, accuracy, accessibility, and non-discrimination. Besides that, cost-efficiency considerations should always be taken into account when implementing the chosen data management model.</p>		
Cost / Cost efficiency	Eight respondents propose adding cost/cost-efficiency as a new guiding principle.	Noted. Besides the 5 Guiding Principles, the implementation of the chosen data management model should take consideration of the costs.
Simplicity	Three respondents believe that simplicity should be considered as a guiding principle as well.	Agree. It is already included within the transparency guiding principle.
Legitimacy	Two respondents suggest adding data legitimacy as a new guiding principle.	Noted.
Customer data ownership and access	One respondent considers that customer data ownership and access should be included as a guiding principle as well.	Agree. This idea is already included within several of the recommendations.
Transparency definition	One respondent notes that transparency should also capture the fact that the supplier should be the only contact for data management towards customers.	Disagree. It depends on the specific data management model.
Accuracy definition	One respondent believes that the accuracy principle should distinguish the industry processes of data exchange and data transfer from the ability of suppliers to convert that data for the purposes of billing end customers.	Noted. The recommendation regarding accuracy only refers to the customer's point of view.



b) Do you see any conflicting principles, which can eventually create problems in the energy market?

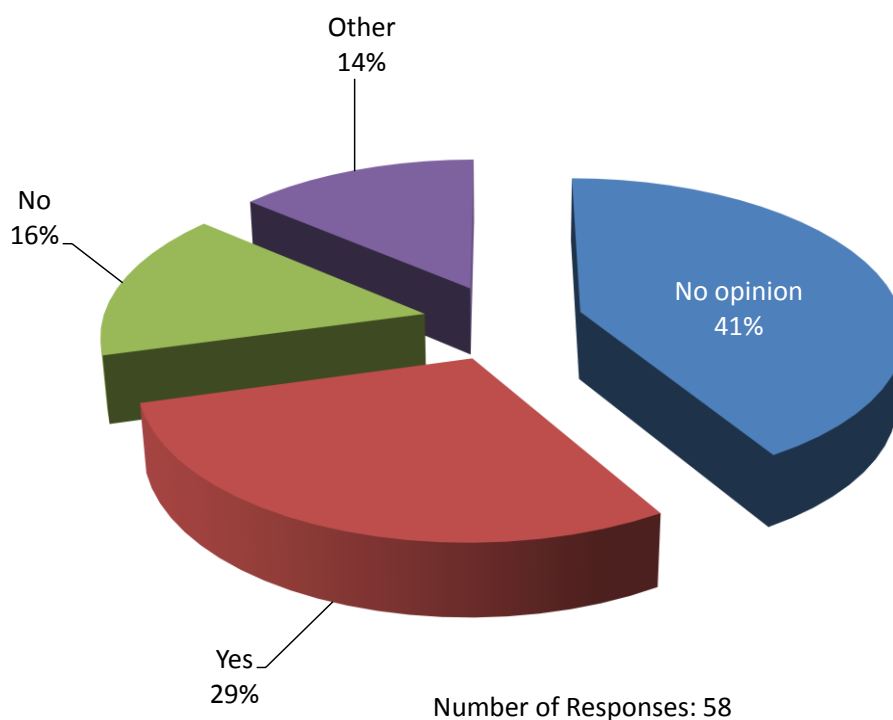


Figure 19 Answers to additional question FQ3b

FQ-3b. In relation to the 5 proposed guiding principles, do you see any conflicting principles, which can eventually create problems in the energy market?	No opinion	Yes	No	Other
Aggregators	1			
Authorities	1		1	
Consumer Associations	3	2		1
DSOs / Network Operators	1	5		
Energy Supply Companies	4	3	4	1
Industry Associations	5	6	1	3
Other Firms	5	1		1
Standardisation Bodies	1		1	
Total	21	17	7	6

Table 42 Answers to additional question FQ3b by respondent group (excluding confidential)



FQ-3b. In relation to the 5 proposed guiding principles, do you see any conflicting principles, which can eventually create problems in the energy market?	No opinion	Yes	No	Other
Austria	2	2		
Belgium		1		1
Denmark	1			
EU	4	3	2	
Finland		1		
France		3	1	
Germany	4	3	1	3
Italy	1		1	
Norway	1			1
Other	1	1		
Poland			1	
Romania	1			
Slovenia			1	
Spain	1	1		
Sweden	3			
Switzerland	1			
UK	1	2		1
Total	21	17	7	6

Table 43 Answers to additional question FQ3b by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Further Question 3b: In relation to the 5 proposed guiding principles, do you see any <u>conflicting principles</u>, which can eventually create problems in the energy market?</p> <p>Overview:</p> <ul style="list-style-type: none"> Less than one third of the respondents (29%) identify conflicts among the proposed guiding principles, especially between accessibility and privacy. A significant proportion of the agents (41%) did not provide any comments. Only 16% of the respondents consider there are no conflicting principles. <p>CEER's Proposal: A potential conflict between the guiding principles of accessibility and privacy may arise.</p>		
Conflict between accessibility and privacy	Thirteen respondents identify a potential conflict between accessibility and privacy and note that it is essential to ensure privacy before any data can be accessed.	Agree.
Conflict between non-discrimination and privacy	Three respondents identify a potential conflict between non-discrimination and privacy, adding that data protection should be a priority.	Agree.
Other types of conflicts	Eleven respondents identified a range of other potential conflicts (not directly between principles, but about how data are used).	Noted. The proposed principles are so interrelated among them that many potential conflicts might arise. However, the final advice will focus on the most significant ones.



FQ4. Do you agree that standardisation of data content, data formats and data exchange, set out in **Section 4.3** of the paper, is important?

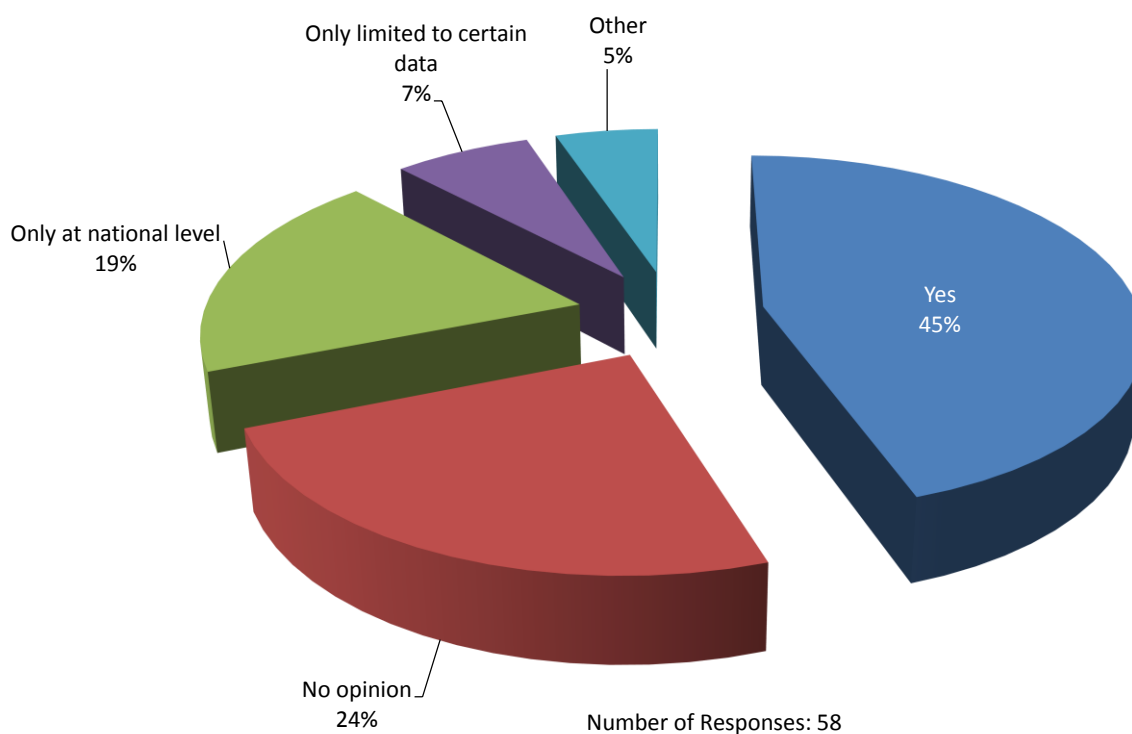


Figure 20 Answers to additional question FQ4

FQ-4. Do you agree that standardisation of data content, data formats and data exchange, set out in Section 4.3 of the paper, is important?	Yes	No opinion	Only at national level	Other	Only limited to certain data
Aggregators		1			
Authorities	1	1			
Consumer Associations	4	2			
DSOs / Network Operators	2		3	1	
Energy Supply Companies	4	1	4		3
Industry Associations	6	3	4	2	
Other Firms	3	4			
Standardisation Bodies	2				
Total	22	12	11	3	3

Table 44 Answers to additional question FQ4 by respondent group (excluding confidential)



FQ-4. Do you agree that standardisation of data content, data formats and data exchange, set out in Section 4.3 of the paper, is important?	Yes	No opinion	Only at national level	Other	Only limited to certain data
Austria	2	2			
Belgium	1		1		
Denmark		1			
EU	5	2	2		
Finland				1	
France			2	1	1
Germany	4	1	5	1	
Italy					2
Norway	1	1			
Other	1	1			
Poland	1				
Romania		1			
Slovenia	1				
Spain	2				
Sweden	1	1	1		
Switzerland		1			
UK	3	1			
Total	22	12	11	3	3

Table 45 Answers to additional question FQ4 by country of origin (excluding confidential)



Question/issue	Respondent's feedback	CEER's position
<p>Further Question 4: Do you agree that standardisation of data content, data formats and data exchange, set out in Section 4.3 of the paper, is important?</p> <p>Overview:</p> <ul style="list-style-type: none"> 45% of respondents consider that standardisation of data content, data formats and data exchange is important, while 24% do not provide any comments. Therefore, there is a good level of support for standardisation, but again differing views between national and EU solutions, since 19% of the agents believe that standardisation should only be considered at a national level. 7% consider that it should be only limited to certain data. <p>CEER's Proposal: Standardisation of data content, data formats and data exchange are important, up to a certain level.</p>		
Only at national level	Twelve respondents support standardisation only at national level, showing some concerns with the possibility of achieving standardisation at a European level.	Agree.
Limited to certain data	Five respondents support standardisation, but consider it should be limited to specific areas: -only point of delivery identification data and consumption data. -only information exchange between DSOs and suppliers and between DSOs and TPIs.	Noted.
No standardisation of the data presented to customers by suppliers	Four respondents are against the standardisation of the data that suppliers present to customers, since they consider that would hinder competition in the retail market.	Agree. This comment has been taken into account in the final advice.
Cost concerns	Four respondents highlight concerns with standardisation at European level, arguing that it would lead to very significant costs that would need to be justified by a full cost-benefit analysis. They also believe that achieving a standardisation at that level is highly unrealistic.	Noted. Cost-efficiency considerations will be mentioned in the final advice. However, standardisation at European level is considered the most appropriate option in the medium-/long-term in order to be able to achieve a competitive and well-functioning European retail market.



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. CEER's members and observers (from 33 European countries) are the statutory bodies responsible for energy regulation at national level.

One of CEER's key objectives is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest. CEER actively promotes an investment-friendly and harmonised regulatory environment, and consistent application of existing EU legislation. Moreover, CEER champions consumer issues in our belief that a competitive and secure EU single energy market is not a goal in itself, but should deliver benefits for energy consumers.

CEER, based in Brussels, deals with a broad range of energy issues including retail markets and consumers; distribution networks; smart grids; flexibility; sustainability; and international cooperation. European energy regulators are committed to a holistic approach to energy regulation in Europe. Through CEER, NRAs cooperate and develop common position papers, advice and forward-thinking recommendations to improve the electricity and gas markets for the benefit of consumers and businesses.

The work of CEER is structured according to a number of working groups and task forces, composed of staff members of the national energy regulatory authorities, and supported by the CEER Secretariat. This report was prepared by the Retail Market Functioning Task Force of CEER's Customers and Retail Markets Working Group.

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More information at www.ceer.eu



Annex 2 – List of abbreviations

Term	Definition
BEUC	<i>Bureau Européen des Union de Consommateurs</i> – The European Consumer Organisation
CEER	Council of European Energy Regulators
DSO	Distribution System Operator
ESCO	Energy Service Company
NRA	National Regulatory Authority
TPI	Third Party Intermediary
TSO	Transmission System Operator