# Comparison Tools – Sector Inquiry in Germany

Stefan Arent, Bundesnetzagentur PEER Workshop Brussels, 08.06.2021









### Background



- Comparison tools are frequently use to get "best" offer
- Consumer expect "fair" comparison of competitors
- Private comparison tools often face with criticism
  - Transparency
  - Fairness
  - Thrust
  - Cooperation
  - Ranking
  - ...



- Public, media and courts push government
  - Coalition add topic to the agenda in 2018
- Bundeskartellamt launched "sector inquiry" 18th October 2017
- Analysis several sector (tools)
  - Energy
  - Telecommunication
  - Finance and Insurance
  - Travel (Booking)
  - Flying
  - Car Rental



- Internal and external discussions (public consultation) identifying following scopes of study:
  - Market overview
  - Consumer related (legal) issues:
    - Market share and coverage
    - Preselection, "Position 0" and Ranking
    - Influencing
    - User Rating
    - Business Models
- Finally the study closes with a legal assessment and recommendations



- Selection of "biggest player"
  - Criteria:
    - "page views" and "visitors" by Wolfram-Alpha, SimilarWeb and Sistrix (40% of CT missing)
    - Questionnaire by Bundeskartellamt, addressed to 134 relevant CT operators (available by google search – first 3 pages; known from advertising; known by test and studies) – 124 Answers
    - Also covering Meta-Search Tools

#### Assessment - ENERGY



- 30 "Energy" CT were analysed
  - Dealing with 3.5 Mio contracts (self assessment)
  - Main Players: Check24 und Verivox

95% of "services": 85% of visits

33 70 OI 7,3CI VICCS 7 OS 70 OI VISICS	
check.com	
check24.de	Check24
tarifcheck.de	
billigstrom.de	
energievergleich.de	Verivox/ProSiebenSat.1
preis24.de	
stromseite.de	
tarife.de	
toptarif.de	
verivox.de	

- Energieverbraucherportal.de, Deine-versorger.de, Hauspilot.de or Mut-zum-Wechseln.de (smaller ones)
- Other CTs using data by Check24 and Virovox

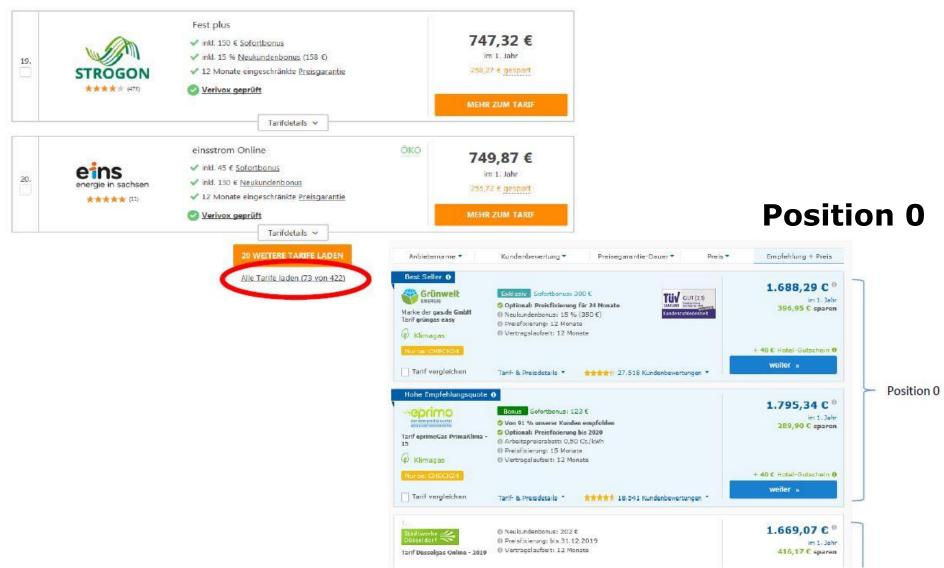


- Market share and coverage
  - 80% 90% of all tariffs available
  - Some tariffs / offers excluded
    - Supplier does not want to participate
    - Complexity of tariffs
    - CT exclude supplier (e.g. unfair contract conditions)

#### **Results - ENERGY**



#### **Preselection**





- Preselection, "Position 0" and Ranking
  - 17% respectively 32% of 422 tariffs are presented by preselections
  - Excluded tariffs have "unfair" conditions
     (pre payment, time of contract, cancelation deadline)
  - Limitation of tariffs per supplier
  - Bonus excludes in first selection
  - Tariffs without provision (for CT) excluded in the first selection (no user rating available, too)
  - Except for ONE all CT make a preselection, this is not always easy to assess for user

#### **Results - ENERGY**



- Preselection, "Position 0" and Ranking
  - All big Player use Position 0 ("Best user rating", "our best", "best green offer" ...)
  - Tariffs are presented twice (Position 0 and ranking), commonly not in the Top 3
  - Position 0 criteria seems to be trustful but hard to assess by user
- Preselection, "Position 0" and Ranking
  - Based on calculated monthly payment
  - Bonus payment included (first), also bonus by CT!
  - 12 month contract (first)
  - Savings compare with "basic tariff" (first)



- Influencing
  - in contrast to other sectors, no "exclusive or limited" offers
  - CTs offering/paying bonus when switching in specific offers (only with exclusive suppliers)
- User ratings
  - Only tariffs commissioned by CT included
- Buisness Models
  - Bundling with suppliers unclear
  - Commissioned based model may disadvantage suppliers
  - Private CTs may **not cover all** offers, suppliers may not cooperate



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Stefan.arent@bnetza.de