

Kapitel	Text
1. Introduction	Moreover, in line with these recommendations, data publication on complaints could contribute to enhancing commercial quality of service.
2.1 Customer complaints	The expression (through various possible channels: letter, email, phone call, physical claim) of a customer's dissatisfaction
2.1 Customer complaints	"The expression (through various possible channels: letter, email, phone call, physical claim) of a customer's dissatisfaction."
2.2 Alternative (out of court) dispute settlement body	
<b>Recommendations</b>	
Rec 1 – info concerning ways of contact on the invoice	Customers should be provided, on their bills, with the contact details of the service provider's customer service.
Rec 2 – info concerning third party	Customers should be provided by their service provider with the relevant contact information of the relevant third party body in case they want to complain. The most convenient channels for contacting this reference point / dispute settlement body should be proposed, among the following options: address, phone number, website, email, face to face contact point.

Rec 3 - channel

To submit a complaint to a service provider, a wide range of channels should be available, and, in any case, more than one.

Statutory complaint handling standards common to electricity and gas service providers should be in place. NRAs are best placed to set up these standards, after consultation with stakeholders, as appropriate, and to enforce them. These standards should cover:

- In cases where a complaint has not been resolved immediately (within 1 day) service providers should provide details of their complaint handling procedures and redress scheme – if available – to the customers who are complaining as well as the information on alternative dispute settlement bodies, with the first acknowledgment of the complaint.

Rec 4 – standardization of complaint handling, 1

Lead time for a service provider to deal with a complaint:

- A prompt first answer or acknowledgement;
- Final answer either resolving the complaint to the customer's satisfaction or informing on the alternative dispute settlement body should be issued as soon as possible, but within two months.

Rec 4 – standardization of complaint handling, 2

Rec 4 – standardization of complaint handling, 3

- Registration of customer complaints preferably using a common classification of the complaints (refer to recommendation 7).

Rec 5 – compensation	Redress schemes should be in place to allow compensation in defined cases.
Rec 6 – follow recommendations	Service providers should follow the alternative dispute settlement body's recommendations.
Rec 7 – sharing data with NRA	When a regulator deems it appropriate to receive data on customer complaints, the service provider should give the regulator access to these data.
Rec 8 - single point of contact	A single point of contact should deliver, in every country, free information and advice on consumer issues. Such a single point of contact could deliver, for example, information on: suppliers; different types of supply contracts; price comparisons; consumer rights; and how to complain. When the single point of contact receives complaints, it should be able to direct customers to the relevant body to handle their complaints. This service should be set either by government or the NRA (in some cases in cooperation with other bodies in charge of consumer issues). It should be available either by phone, email, written mail (letter or fax) or in person.
Rec 9 - contact with service provider	Before submitting a complaint to a third-party body, customers should first contact their service provider to explain their complaint and try to solve it directly with the provider. Even if the service provider is the first step in the complaint process, customers can naturally ask for information on their rights to an independent body (the single point of contact or an alternative dispute settlement body in case it also deals with information requests), before Ref: E09-CEM-26-03 Draft Advice on Customer Complaint Handling, Reporting and Classification 14/52 submitting their complaint to their service provider.

Rek 10 - channel	To get in contact with a third-party body, a wide range of channels should be available, and, in any case, more than one, even if – at a later stage – a written document may be necessary for a formal procedure with alternative dispute settlement bodies.
Rek 11 - free access for all customer	<p>'Alternative dispute settlement should be made available for all household customers, preferably without charge or as inexpensively as possible irrespective of the financial amount of the dispute. Regarding third party bodies, the following complaint handling standards should be effective, in accordance with the above-mentioned Commission Recommendation and with 3rd Package legal provisions:</p> <ul style="list-style-type: none"> <li>• A common classification of complaints should be used, as far as possible;</li> <li>• Written complaint procedures should be determined within third parties, and made available to all customers. These procedures should include the communication of complaint to the service provider(s) before coming to a decision/recommendation;</li> <li>• A prompt first answer or acknowledgement should be issued;</li> <li>• A lead time to solve the complaint/dispute should be determined on a national basis.</li> </ul>
Rek 12 - processen för "third party"	Final recommendations from a third-party body should be issued as soon as possible, and according to a lead time which is proportionate to the level of complexity of the complaint.
Rec 13 – compensation	<p>Customers whose complaint has been settled in their favour should be allowed a fair compensation from their service provider.</p> <p>When a regulator deems it appropriate to collect data on customer complaints, the regulator should have the possibility to receive the relevant information from third parties as well as from service providers</p>
Rec 14 – NRA collecting data	(refer to Recommendation 7).

The NRA or another third-party body having responsibility on customer complaints could provide and publish reports on complaints they have received. Depending on the level of maturity of the retail market, the report could include information such as:

- Categories of complaints which most frequently appear;
- Proposals of best practices that could be followed by suppliers in their complaint handling processes;
- A list of ADR Board recommendations which have not been followed by service providers, including their names;
- A description of the complaint handling process within each service provider. The frequency of reporting should be at least once per year.

Rec 15 – publishing data

- Connection to the grid (tariff, delay, obstacles to connection, other)
- Metering (Meter reading, meter functioning, other)
- Quality of supply (Voltage quality of supply, continuity of supply (outages), other)
- Unfair commercial practise
- Pre-contractual information (Unfair terms and conditions)
- Cooling of period / right of withdrawal
- Activation (Moving in, Reconnection after disconnection)
- Disconnection due to no or late payment
- Invoicing (unclear invoice, incorrect invoice, double invoice, non issue of invoice or difficult access to invoice/monthly statement, consumption estimation, other)
- Price / Tariff (Price / Tariff transparency, Price / Tariff change, Social Tariff, other)
- Redress
- Provider change /switching (Dwelay, unwished switch, other)
- Poor or deficient customer service
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4. Complaints classification

### Comments from the KundOmbudsman

Cultural differences lead to differences in opinion. It is therefore relevant to ask whether one can receive a general answer to a question, whether one can draw a conclusion from this answer and whether these conclusions are accurate.

What is a complaint? Which complaints should be directed forward and where do we draw the line? Is the choice of channel really of importance? Customer and company should primarily agree on the content before it is considered to be a complaint, or should we measure misunderstandings? With all reporting this easily becomes too bureaucratic. This can not be stressed enough.

The definition is acceptable, however it is important how we later are "forced" to classify complaints.

In Sweden we have the National Board for Customer Complaints, but also owner directives within VF that give the Customer Ombudsman the possibility to make decisions that are legally binding for the VF companies. Customers always have the opportunity to choose dispute settlement at third party.

Contact details are always provided on the invoice.

Primarily an effort should be made to solve the matter within the company. In Sweden there are always external channels available. Furthermore there should be a presentation on the process for escalation available on, for example, the website. Do not include too much information on the invoice, this information should be offered through the website and in supplements that are sent with the invoice.

### Consequences

Increased reporting? Increased transparency on complaints – is there something for us to worry about?

The definition is rather wide. This opens up for all sorts of dissatisfaction.

The definition can be interpreted as if a posed question becomes a complaint or the other way around. For example the invoice layout. Will there be a demand to register "doubts" that are solved with first acknowledgment of the complaint.

We need to become better at informing customers on how to appeal against decisions at alternative dispute settlement bodies. Today there are references to the Customer Ombudsman through our website. There are no references on the invoice.

It should be up to each supplier to decide upon, however it should not be a cost driver or inhibit competition; good handling ought to create customer satisfaction. This is a complicated matter for companies with wide geographical spread. There is an obvious risk of increasing costs. Good complaint handling without physical point is fundamental to good competition.

Physical offices.

The matter should be handed to appropriate person, i.e. the person with greatest competence within the problem area. Information concerning lead time should be given within a day notice. Depending on type of errand, lead time can vary. Direct contact with the person handling the matter is always the best option seen through the customer's perspective. If the customer is not satisfied she will be informed of alternative dispute settlement bodies. Time must be given to solve the problem.

If we do not solve the problem with the first acknowledgment of the complaint, we will inform about our procedures as well as on alternative dispute settlement bodies. This means that Customer Services at VF need to share more information to the customer, as well as more information on the website and in letters. The lead time of an errand is two months. According to text the customer should be satisfied; however laws and contracts are not always formulated for this purpose. Therefore a customer is not always satisfied even though the solution complies with rules/ contract.

The customer should first be requested to contact the Customer Ombudsman, before contacting an external party, se p 2.2

Internal work with review of the classification of complaints - which match the proposed recommendation. There should be a way to follow errands according to their classification. There is no way of measuring this with 100% certainty.

Because of varying complaints between different countries/cultures and because of difference in development of the electricity market, these classifications should be dealt with in a careful manner so that the companies can use them to improve. Open for the possibility to give the local Regulator, after consultation with the companies, responsibility to gather statistics specific to each country.

Furthermore there should be a review of measures that we have to/ need to carry out. Warning: even if everything could be measured and surveyed - including complaints that were to be handled within the first acknowledgment - there is no possibility of doing this today!

Compensation has to suit the individual case. Pre-settled levels are already used in cases such as delayed change of supplier. Companies should consider pre-settled levels as a mean of competition. It stands to reason to follow such recommendations, regardless if the decision is taken by an internal Customer Ombudsman function or an external body.

No comments

Compensation should be available to dissatisfied customers.

VF ought to follow decisions made by the National Board for Customer Complaints and EI etc.

VF will hand out data on customer complaints.

Today there is already a well working Swedish Electricity Advice Bureau that can serve as "a role model for the union". In Sweden there are Consumers Advice Bureaus which make physical meetings possible.

Concerns third party.

Se comments on recommendation 2, this is important as reclamations creat possibilities for the company to improve.

Third party should refer to us.



Channels to third party.

This is how VF's Customer Ombudsman in Sweden works today.

Access to third party without any extra costs.

Process with ways of information etc.

Compensations are always given according to decision made by the Customer Ombudsman or Complaint Services within the company.

Customers should be compensated.

Information is always shared with public authorities and legal customer representatives.

Statistics on complaints should be gathered by NRA – when they find this to be appropriate – this will lead to administrative work at our unit.

This is already a part of what the National Board for Customer Complaints and NRA are doing. These two present information on companies that do not follow their recommendations. Such information includes number of complaints and the type of complaints that are most frequently returning.

A shame list on companies with many complaints will be published and respective companies process.

It is relevant to ask what the benefits are from collecting such information. Companies should be aware of the source of dissatisfaction within their own customer base, so that they can decrease this dissatisfaction (costs of handling these). Suppliers that are not acting in an appropriate manner will be blacklisted by the National Board for Customer Complaints. The type of complaints varies across different countries in Europe because of differences in degree to which the market is deregulated and the way customer issues are handled.

There should be a review on the classifications. We also need to review if we need both level 1 and 2.

**Our opinion**

**Proposed mesasure**

**See**

Ok.

Our work should be constrained to complaints concerning our area of responsibility, not the common dissatisfaction concerning other group activities.

Add ... regarding the service. Or something similar.

Clarify the definition by examples. This can both become a support and an obstacle. There is a risk of overdoing things.

Clarify the definition by examples.

Ok, we already have this.

We find it unnecessary to include such information on the invoice. It is sufficient to add references on the website, to be available for questions and refer to customer services. This is not a mandatory procedure.

Add references on our website to the Swedish Consumer Electricity Advice Bureau etc, possible reference on the invoice to Customer Service at VF.

We make references in our letters, step two. How does RUT do?

A wider range of channels is better. BUT: Our opinion is that there should not be a requirement on physical meetings to a great extent. However we should be able to meet customers in specific situations. The physical distance does not allow pure service offices; instead our existing units should be open to the public.

It should be possible to have close cooperation with entrepreneurs, consumer guidance etc.

Vaguely defined. Mainly ok, except for the question to the right.

What is the meaning of a solved complaint?  
An answer or a satisfied customer?

Two months is a reasonable lead time. Some errands might need longer lead time, in that case the customer will be informed. It is acceptable to refer to third party.

The main classifications available should be appropriate. For example we find "connection to the grid – other" to be suitable for many of our errands. Most of our errand classifications are handled within other divisions of our organization, i.e. not within Reclamations. To register all errands as complaints, for example invoice, is a cost driver when using SAP as it is today. Customer Services receive about 8000 calls each month, around 500 of these are registered as "customer reactions".

What is meant in the investigation?  
What does VF want? What is going to be recorded?

We apply laws. Swedish law is clear when it comes to compensating damages. Furthermore VF compensates customers to a greater extent than it is obligated to do. Customer Services have mandate to hand out such compensation. VF also has customer promises. Certain regulations exist in the grid agreements.

We already do this.

We already do this, BUT customer integrity will of course also be taken into consideration.

No opinion

We think this is good.

No opinion

No opinion. However it facilitates our work if we need to redirect an errand.

No opinion

We follow recommendations given by, for example, the National Board for Customer Complaints and EI. IF they recommend compensation, then the costumer will be compensated.

OK.

Ok, transparency!

This should not be too difficult. HOWEVER our experience is that it sometimes is more complicated to get a systematic support then one would think.