



Complaint Handling Results of EREGEG public consultation and stakeholder conference

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ER GEG work on complaints during the past year

- 2.10.2009: presentation of **Draft Advice on Complaint Handling, Classification and Reporting** at the 2nd Citizens' Energy Forum, London
- 2.10-2.12.2009: **public consultation**
- 25.2.2010: **public stakeholder conference**, Brussels
- **22.6.2010**: publication on www.energy-regulators.eu of:
 - **Final Guidelines of Good Practice** (E10-CEM-33-05)
 - **Evaluation of Responses to the consultation** (E10-CEM-33-05a)



The Public Consultation

- ▶ 25 written contributions from 11 countries & EU level
 - ▶ 22 responses from **service providers**: 4 European organisations, 3 national organisations, 1 European organisation of suppliers' ombudsmen, 14 companies
 - ▶ 2 **consumers' representative groups** at European level
 - ▶ 1 national independent **Ombudsman**
- ▶ Most of the respondents (service providers and third-party bodies) offered large support for the majority of recommendations



The Stakeholder Workshop

- ▶ 80 participants from 19 countries and EU level
- ▶ Presentations of ERGEG and European Commission work on customer protection and complaint handling issues
- ▶ Two panel discussions with the audience – practical experiences and stakeholder views – focused on 2 main issues that emerged during the public consultation:
 - ▶ **Issue 1: Complaint handling standards and redress schemes**
 - ▶ **Issue 2: Complaint data collection, reporting and publication**

Main issues arising from the public consultation and workshop

Issue 1: **Complaint handling standards and redress schemes** (which should apply to service providers)

<i>Taking into consideration the following comments...</i>	<i>recommendation 4 has been updated:</i>
Service providers require stakeholder consultations at national level to help define complaint handling standards	EREGEG recommends that standards should be determined at national level
Customers require transparency of information on the standards, once they have been determined	EREGEG recommends that national complaint handling standards should be made public and available on request

Complaint handling standards and redress schemes (Issue 1)

Lead time to deal with a complaint (Recommendation 4)

<p><i>Taking into consideration the following facts and comments...</i></p>	<p><i>Recommendation 4 has been slightly updated:</i></p>
<p>Lead time varies from 8 working days to 2 months among countries where there is one</p>	<p>Whatever the channel of reception:</p> <ul style="list-style-type: none"> - A prompt first answer <u>or</u> acknowledgement should be delivered to customer within 1 day (by COB on the day following receipt of the complaint) - A final answer of the service provider should be issued within 2 months
<p>...is considered as a prerequisite by customer representatives, who wish the shortest possible (8 days)</p>	
<p>...is accepted by most service providers, asking for a reasonable lead time.</p>	

Issue 2: Complaint data collection, reporting and publication

Service providers, as well as third-party bodies, should give the regulator access to data on complaints (Recommendations 7 & 14)

<p><i>Taking into consideration the following facts and comments...</i></p>	<p><i>Recommendations 7, 14 & 15 have been slightly updated:</i></p>
<p>Service providers:</p> <ul style="list-style-type: none"> - Publication of complaints data should be carried out with caution and only after in-depth analysis - Risk of financial and operational burden on companies 	<ul style="list-style-type: none"> - Data collection: within the framework of retail market monitoring by NRA (among other indicators) - Data publication:
<p>Customers and service providers: Transparency on performance could drive competition and give customers trust in the market</p>	<ul style="list-style-type: none"> > by NRA (retail market monitoring) > by third-party bodies having responsibility for customer complaints (NRA, Ombudsman, etc)

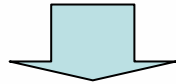


Complaint data collection, reporting and publication (Issue 2)

<p><i>Taking into consideration the following facts and comments...</i></p>	<p><i>Recommendation 7 slightly updated:</i></p>
<p>Service providers: International comparisons should be carried out very carefully, due to cultural specificities and various levels of availability of complaint handling services among countries</p>	<ul style="list-style-type: none">- Scope of data collection, its modalities, frequency and data format required should be defined at national level- The use of a common classification of complaints (at European level) by all service providers would guarantee comparability of data between them- Compliance with national rules on data protection
<p>All stakeholders: Transfer of data will have to comply with national rules on data protection</p>	

Some other issues, arising from the public consultation and workshop, are mentioned in the Introduction of the Final GGP:

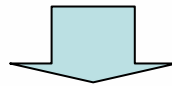
- **The very first step of the complaint process** is to allow customers to submit their complaint...
 - **without any barrier** that would discourage them,
 - **without any discrimination** between some categories of customers



- **Accessibility and availability** of service providers' **customer services / hotlines**:
 - **a key issue for ensuring customers' confidence**
 - could be considered as part of complaint handling standards, at a national level

‘Company ombudsmen’

- They are financed and operated each by a single company
- From a customer point of view, it is the “last step” of the service providers’ customer service
- They have access to their own company’s IT systems and customer’s files.
- Their decisions have a financial impact on their own company



Only **third party bodies** who are **independent** from a particular service provider are covered in the ERGEG “Recommendations regarding third party bodies”, since they ensure **neutrality** from service providers, which is essential for **customers’ trust** in the mechanism.



Link to the report (click on the title):
[GGP on Customer Complaint Handling,
Reporting and Classification](#)

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