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Ihr Zeichen	Ihre Nachricht vom	Name	DW	Datum
-	-	Mag. Alexandra Herrmann/Ha – 47/2009	212	30. 11. 2009

### VEÖ response to ERGEG consultation on complaint handling

Dear Madam,  
Dear Sir,

The Austrian Association of Electricity Companies appreciates the opportunity to comment the consultation on complaint handling, reporting and classification.

We hope that our contribution will prove useful for the ERGEG advice and are at your disposal for any further information.

#### 3.1.1. Information on the bill on how to complain

##### Recommendation 1:

Customers should be provided, on their bills, with the contact details of the service provider's customer service.

##### Recommendation 2:

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.

##### **Comments:**

We agree that appropriate information should be made available to the customers with respect to complaint handling. As a first step, the complaint should be forwarded to the service provider's customer service. In the situation when the customer service is unable to provide proper remedy, the next step is that the complaint should then be escalated to a relevant third party body. Only for this case, the contact information of the relevant third party body is provided (and not initially on the bill).

For the purpose of meaningful statistical assessment of service provider's performance, emphasis should be placed only on those contacts where the service provider has had the opportunity to deal with the matter regarding which the contact is made.

### **3.1.2. Choice of the complaint channel within service provider**

#### Recommendation 3:

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

#### **Comments:**

We believe that the customer should have a choice of different channels to submit a complaint to a service provider, at least in writing, but preferably also by telephone and internet.

### **3.1.3. Statutory complaint handling standards shared by all service providers**

#### Recommendation 4:

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.

#### **Comments:**

We support improvement of customer's confidence, where possible. These standards should however not go beyond the status of minimum requirements, as to give suppliers room for competition on service levels.

### **3.1.4. Service providers' redress schemes**

#### Recommendation 5:

Redress schemes should be in place to allow compensation in defined cases.

#### **Comments:**

The current applicable compensation of damages is sufficient. Further provisions should not be foreseen, as they restrict the supplier's flexibility.

### **3.1.5. Compliance with alternative dispute settlement body's recommendations**

#### Recommendation 6:

Service providers should follow the alternative dispute settlement body's recommendations.

#### **Comments:**

In Austria the suppliers already follow the dispute settlement body's recommendations. Legal binding rules on this issue are not necessary.

### **3.1.6. Complaint data collection by NRA**

#### Recommendation 7:

When a regulator deems it appropriate to receive data on customer complaints, the service provider should give the regulator access to these data.

#### **Comments:**

Extensive data deliveries must be avoided.

We reject the delivery of data on customer complaints to the NRA as well as a publication of these data. Data on customer complaints are internal data and therefore business secret. National regulation concerning handling of a customer's personal data must be taken into account.

These types of data are no adequate indicators for the functioning of competition and market opening.

### **3.2.1. Single point of contact**

#### **Recommendation 8:**

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.

#### **Comments:**

On national level a range of bodies on consumer information and complaint handling already exists.

### **3.2.9. Complaints monitoring & indicators**

#### **Comments:**

Indicators on markets should be handled carefully: Especially further regulations based on monitoring results which may have limited value should be avoided.

Yours sincerely  
Association of Austrian Electricity Companies

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