

Guidelines of Good Practice on Price Comparison Tools

Evaluation of responses

**Ref: C12-CEM-54-03a
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INFORMATION PAGE

Abstract

In October 2011, CEER launched a public consultation on its Draft advice on Price Comparison Tools (C11-CEM-45-5). The document outlined a number of draft recommendations designed to improve the quality of price comparison tools.

This document provides a summary and evaluation of the responses received and CEER's views on those responses.

Target Audience

Energy suppliers, traders, those that both generate and consume electricity, electricity customers, electricity industry, customer representative groups, network operators, Member States, academics and other interested parties.

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Related Documents

CEER/ERGEG documents

- Draft Advice on Price Comparison Tools - A CEER Public Consultation Paper, CEER, October 2011, C11-CEM-45-05, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/CUSTOMERS/Price%20Comparison%20tools/Consultation_Documents/C11-CEM-45-05_Draft-advice-Price-Comparison-Tools_11-10-2011.pdf
- Price Comparison Tools: case studies. Annex 1 to CEER draft advice on Price Comparison Tools, CEER, October 2011, C11-CEM-45-05a, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/CUSTOMERS/Price%20Comparison%20tools/Consultation_Documents/C11-CEM-45-05a_Case_studies_PCT_11-Oct-2011bis.pdf
- GGP on indicators for retail market monitoring for electricity and gas, ERGEG, October 2010, Ref. E10-RMF-27-03, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab1/E10-RMF-27-03_final%20GGP%20IRMM_12-Oct-2010.pdf
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[ComplaintHandling_10-Jun-2010.pdf](#)

- GGP on customer complaint handling, reporting and classification, ERGEG, June 2010, Ref. E10-CEM-33-05, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Guidelines%20of%20Good%20Practice/Other/E10-CEM-33-05_GGP-ComplaintHandling_10-Jun-2010.pdf
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- Customer Information Handbook. A review of good practices, ERGEG, December 2006, Ref. E06-CPR-04-03, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/2006/E06-CPR-04-03_Customer_Info_Handbook.pdf

External documents

- The functioning of the retail electricity markets for consumers in the European Union - Commission staff working paper, EC, November 2010, Ref. SEC(2010)1409 final, http://ec.europa.eu/consumers/strategy/docs/SWD_function_of_retail_electricity_en.pdf
- An energy policy for consumers - Commission staff working paper, EC, November 2010, Ref. SEC(2010)1407 final, [http://ec.europa.eu/energy/gas_electricity/doc/forum_citizen_energy/sec\(2010\)1407.pdf](http://ec.europa.eu/energy/gas_electricity/doc/forum_citizen_energy/sec(2010)1407.pdf)

Table of Contents

EXECUTIVE SUMMARY	5
1. INTRODUCTION.....	7
1.1. The importance of price comparison tools in empowering consumers.....	7
1.2. Context	7
1.3. Purpose of this paper	8
1.4. The draft recommendations	8
1.4.1. Public hearing	11
1.5. Analysis of the responses	11
1.6. Next steps.....	12
ANNEX 1 – CEER	13
ANNEX 2 – LIST OF ABBREVIATIONS	14
ANNEX 3 – CONSULTATION RESPONDENTS	15
THE TABLE BELOW LISTS THE RESPONDENT BY COUNTRY.....	16
ANNEX 4 - EVALUATION OF RESPONSES	19
4.1 Summary of consumer organisation’s responses to the consultation	47

Tables

Table 1 - Draft recommendations.....	10
Table 2 - List of abbreviations	14
Table 3 - Overview of respondents - Respondent group	16
Table 4 - Overview of respondents - Country of origin	18
Table 5 - Evaluation of responses.....	46

EXECUTIVE SUMMARY

At the 3rd Citizens' Energy Forum in London in 2010, the European Commission presented an Energy study exploring the benefits the liberalised energy market brings to customers in all 27 member states. One of the key findings of the study was that many customers did not have access to neutral, objective information that empowers them to take an active role in the liberalised energy markets, by switching tariffs or switching suppliers to obtain a better deal. In some cases, this information was provided, but customers had trouble finding it.

Based upon these findings, the European Commission concluded that easy access to neutral, objective information is crucial for the further development of the European energy markets and asked CEER to prepare a draft advice on how to provide this information to customers. CEER decided to establish Guidelines of Good Practice for Price Comparison Tools (PCTs).

In October 2011 CEER published a consultation proposing 16 draft recommendations for price comparison tools. This document evaluates the 36 responses received following that consultation and sets out CEER's position regarding the comments made by stakeholders.

The 16 draft recommendations fell within these themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correct and accurate, user-friendliness, accessibility and background information.

Stakeholders agreed that PCTs should be independent and provide a non-discriminatory view of the market. Information has to be displayed in a consistent way which may enforce consumer confidence. Many respondents did not agree with the draft recommendation that self-regulation of PCTs is appropriate. Many stakeholders suggested that privately run PCTs need some sort of oversight either from the National Regulatory Authorities (NRAs) or another public body. However, respondents suggested this may be done through different routes: regulation, accreditation, legislation, voluntary codes of conduct or self-regulation; where appropriate.

Respondents to the consultation agree that PCT websites need to disclose the way they operate to provide transparent information on the impartiality of their advice. This information should be easy for consumers to access and understand.

The examination of the principle of exhaustiveness revealed that a majority of respondents agree that all prices and products should be shown as a first step. If this does not give a complete overview of the market, the PCTs should clearly state that. Consumers should be able to filter results according to their needs and specify his request by entering specific data. Stakeholders were divided on the question whose role is to ensure that data is comprehensive and accurate, suggesting it is the role of the PCT, the supplier or the NRA.

The analysis of the recommendation regarding clarity and comprehensibility of PCTs showed that the costs should be displayed on the basis of the contract duration. Moreover, fundamental characteristics of all products should be presented on the first result screen. In addition, further information on products and services may be helpful for consumers. If regulated prices do exist in a market, they should be highlighted in the search in an impartial way.

Concerning the correctness and accuracy of PCTs, the evaluation of responses illustrated the need to update price information as often as necessary to best reflect the situation in a national market.

In terms of user-friendliness the evaluation of responses confirmed the necessity to offer consumers help to understand their energy use through default consumption patterns.

The examination of the principle of accessibility showed the need to offer at least one other information channel free or at minimal cost for consumers who do not have internet access, though some respondents noted that such a service could be costly. Respondents agreed that PCTs should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access to the comparison. The use of social media and cooperation with (other) public agencies may help to make NRA-run PCTs widely known although this should not be a prerequisite.

Stakeholders expressed their interest to display, or sign-post to, background information if the customer wants it.

Overall, most stakeholders agreed with most of the recommendations CEER presented in its draft advice.

The final Guidelines of Good Practice are available on CEER's website, www.energy-regulators.eu.

1. Introduction

1.1. The importance of price comparison tools in empowering consumers

There is still need for more and better information for energy customers to stimulate them to take part in the energy market in an active and effective way. CEER sees price comparison tools as a crucial instrument to provide information to electricity and gas customers.

Price comparison tools offer clear and transparent information to customers. There exist a broad variety of price comparison tools not only for energy but also for other market sectors such as insurance and mobile phones. In the energy sector, these tools are either publicly offered by the NRA or an authority dealing with customer protection issues or they can be privately-owned, for example by providers that get a certain fee for mediation or directly by suppliers themselves.

In October 2011 CEER launched a public consultation on draft advice on PCTs (Ref: C11-CEM-45-05) and published a series of case studies (CEM-45-05a). It outlined 16 recommendations for good practice in running on line price comparison services. The scope of the draft recommendations was to present best practices for Member States, national regulators and market players in designing and delivering well-functioning price comparison tools. This document evaluates the responses to that consultation.

1.2. Context

The European Commission 2010 study of retail energy markets found that many customers do not have access to neutral, objective information that empowers them to take an active role in the liberalised energy markets, by switching tariffs or switching suppliers to obtain a better deal

Following its study, the European Commission concluded that easy access to neutral, objective, comparative information is crucial for the further development of the European energy markets. CEER launched a work stream to prepare draft advice on how to provide this information to customers.

In most Member States, there is at least one price comparison tool providing information to household and small business customers.

The following are the primary models for price-comparison tools:

- Owned and run by the NRA or by another public body,
- Run by a private company, with regulatory oversight by a NRA or by another public body, or
- Run by a private company without regulatory oversight.

In May 2012 the European Commission published its Consumer Agenda to boost confidence and growth across different sectors. One of the four key objectives are improving implementation, stepping up enforcement and securing redress. We note as part of this the Commission's interest in the emerging role of online price comparison tools.

1.3. Purpose of this paper

In October 2011 CEER launched a public consultation on draft advice on PCTs (Ref: C11-CEM-45-05a). It outlined 16 recommendations for good practice in running on line price comparison services. The consultation ended in December 2011. 35 responses were received to this consultation document. A list of the respondents and an Evaluation of the Responses is contained in Annex 2 of this document.

The final Guidelines of Good Practice on PCTs are available in a separate document, on CEER's website (Ref: C12-CEM-50-03).

1.4. The draft recommendations

The table below sets out the 16 draft recommendations for good practice in running on line price comparison services, as presented in the consultation document.

Draft Recommendations	
Independence of the tool	
1	Any price comparison tool should be independent, giving the user a non-discriminatory overview of the market. The provider of a price comparison tool should show all information in a consistent way.
2 A)	Regulatory oversight of privately-run price comparison tools is important to bolster confidence of the customers. This should be a responsibility of the NRA, or another public authority.
2 B)	Alternatively, this could be left to self-regulation by the industry through instruments such as voluntary codes of conduct.
Transparency	
3	Price comparison websites should disclose the way they operate, their funding and their owners/shareholders, to provide a transparent service to customers.

Exhaustiveness	
4	When possible, all prices and products available for the totality of consumers, if relevant to the customer, should be shown as a first step. However, if the presented information doesn't give a complete overview of the market, the price comparison tool should clearly state this before showing the results of the price comparison. Filtering of results should be offered to the customer to select the offerings corresponding with his or her preferences.
5	The customer should be able to specify a request by entering specific data, if the customer wishes to include individual components (not applicable for the totality of customers) into the comparison, such as his/her yearly consumption. It is important to help the customer to determine his/her yearly consumption as accurately as possible.
Clarity and comprehensibility	
6	Costs resulting from the price comparison should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of the unit kWh-price. However, it is also very important to clearly indicate that prices shown as a total cost are an estimation, as they are based on historic consumption and – in the case of floating tariff products – unit prices that are susceptible to change during the contract.
7	Fundamental characteristics of all products – such as fixed tariff products versus floating price products - should be presented and explained on the first page of the result screen. This differentiation should be easily visible to the customer.
8	The price comparison tool should offer additional information on products and services. This information should be available with additional details on a separate page, so the customer has the choice to look at this information or not.
9	If regulated prices exist, they have to be highlighted visibly in the default presentation of the price comparison tool.
Correctness and accuracy	
10	Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the

	market.
User-friendliness	
11	The user should be offered help through default consumption patterns or – preferably - a tool that calculates the approximate consumption, based on the amount of the last bill or on the basis of other information available to the user.
Accessibility	
12	At least one additional communication channel (other than the Internet) for getting a price comparison should be provided free of charge or at minimal cost.
13	On line price comparison tools should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to be overcome to access the comparison.
14	The use of social media and cooperation with other (public) agencies involved in customer information and/or protection should help make the price comparison tool widely known.
Background information	
15	Background information on market functioning and market issues such as price developments should be provided if the customer wants this information.
16	A good practice is to offer additional services on request of the customer, such as a “reminder” if the customer is bound by a contract when doing the price comparison.

Table 1 - Draft recommendations

1.4.1. Public hearing

After the consultation closed, a public hearing was held on 14 March 2012 with organisations who responded to the consultation and other interested parties. The hearing gave stakeholders an opportunity to discuss their views and hear other stakeholders' opinions, as well as the occasion for the TF to discuss particular areas of interest in detail before embarking on writing the final advice and recommendations. Delegates represented a range of organisations including consumer organisations, provider of PCTs, energy suppliers, the European Commission as well as NRAs from all across Europe.

CEER presented the headline views emerging from the consultation to provide participants with a general overview on the state of play. Contributions followed from the European Commission (DG ENER and DG SANCO), a case study from the Netherlands regulator and the view of a private PCT provider active in the Dutch and Spanish market. In the afternoon session a round table discussion was held, structured around six main topics emerging from the consultation responses. These were each linked to a speaker that volunteered to provide an introductory statement:

- Regulation or self-regulation?: Beuc
- Consistency of information versus innovation and differentiation: Eurelectric
- Simplicity and comprehensibility: Emeter
- 'Need to know' versus 'nice to have' information: Verivox
- Other channels than Internet: cost versus inclusion: CEER
- Future challenges for PCTs: French Ombudsman

During the debate, a number of issues were raised and were taken into account in the further analysis of the responses:

- Every stakeholder has a distinguished role to play: regulators, public and private PCTs, consumers as well as energy suppliers.
- As regards the group of consumers, they necessitate trust which could potentially be fostered via confidence codes or specific accreditation schemes.
- Most stakeholders also expect some sort of regulative oversight by the NRAs in order to ensure the well-functioning of PCTs. As this is organised differently throughout Europe, there might not be a single concept prevailing.
- Further to that, (independent) private PCTs are not necessarily allies of suppliers but may act in the consumer interest by forcing suppliers to keep offers as simple and transparent as possible as well as better explaining the offers to the customers.
- Another result of the discussion is the assumption that public and private PCTs can coexist in a market, as they have different goals and offer different services and added value to customers.

1.5. Analysis of the responses

CEER has evaluated the responses and comments provided in the public consultation, in terms of consumer protection and empowerment.

Responses were received from 36 organisations, listed in Annex 3.

Respondents had the option of agree or disagreeing with the questions posed in the consultation document and in addition they could insert a short comment on the rationale for their position. Some respondents also attached additional documents setting out their views or provided supporting published documents.

Annex 4 summarises the answers given by the stakeholders. The table identifies the number and type of respondents who agree or disagree with the draft recommendations and their comments. CEER's position is presented too.

1.6. Next steps

The outcome of the public consultation will be reflected in the Guidelines of Good Practice on Price Comparison Tools (C12-CEM-50-03) which will be published alongside this document.

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. Through CEER, a not-for-profit association, the national regulators cooperate and exchange best practice. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest.

CEER works closely with (and supports) the [Agency for the Cooperation of Energy Regulators \(ACER\)](#).

ACER, which has its seat in Ljubljana, is an EU Agency with its own staff and resources. CEER, based in Brussels, deals with many complementary (and not overlapping) issues to ACER's work such as international issues, smart grids, sustainability and customer issues.

The work of the CEER is structured according to a number of working groups, composed of staff members of the national energy regulatory authorities. These working groups deal with different topics, according to their members' fields of expertise.

This report was prepared by the Consumer Empowerment Task Force of the Consumers and Retail Markets Working Group.

Annex 2 – List of abbreviations

Term	Definition
CEER	Council of European Energy Regulators
CEM TF	Customer Empowerment Task Force
EC	European Commission
EU	European Union
GGP	Guidelines of Good Practice
NRA	National Regulatory Authority
PCT	Price comparison tool
RMC WG	Retail Market and Customer Working Group
RMF TF	Retail Market Functioning Task Force
WAG	Web Content Accessibility Guidelines

Table 2 - List of abbreviations

Annex 3 – Consultation respondents

Responses were received from 35 organisations. They are categorised below by the type of organisation.

	Consumer Organisations	Country of Origin
BEUC	BEUC – European Consumer Organisation	EU
CONSU	Consumer Focus	United Kingdom
FBRDK	Danish Consumer Council	Denmark
MEDIA	Médiateur national de l'énergie	France
VZBVV	vzbv- Verbraucherzentrale Bundesverband e.V.	Germany
WHICH	Which?	United Kingdom
	Energy Suppliers	Country of Origin
CEZAS	Cez Trade	Czech Republic
DEIGR	Public Power Corporation	Greece
EDFEN	EDF Energy	United Kingdom
EDFSA	EDF	France
EDISO	Edison SpA	Italy
EDPGS	EDP – Energias de Portugal, SA	Portugal
EONAG	E.ON AG	Germany
EVNBU	EVN Bulgaria	Bulgaria
GASNA	Gas Natural Fenosa	Spain
IBERE	IBERDROLA	Spain
RWEAG	RWE AG	Germany
RWECZ	RWE Transgas, a.s.	Czech Republic
SSECO	Scottish and Southern Energy	United Kingdom
VATEP	Vattenfall Sales Poland Sp.o.o.	Poland
	Energy Supplier Organisations	Country of Origin
CEDEC	European Federation of Local Energy Companies	EU
EUREL	Eurelectric	EU
EURGS	EUROGAS	EU
SVENS	Sweden Energy	Sweden
ZAVAN	Oberoende Elhandlare	Sweden
VERBA	Verband kommunaler Unternehmen e.V.	Germany
	Price Comparison Tools	Country of Origin

BENEN	Benergy BV	Netherlands
EMETE	eMeter	Netherlands
SWITC	The Switch Company	Netherlands
VERIV	Verivox GmbH	Germany
	Transmission System Operator	Country of Origin
ENNET	Energinet.dk	Denmark
	Distribution System Operators	Country of Origin
ALLIA	Alliander	Netherlands
ORES	ORES- Opérateur des réseaux gaz et électricité	Belgium
	Energy Distribution Organisation	Country of Origin
GEODE	Groupement Européen des entreprises et Organismes de Distribution d'Energie	EU
	Academic	Country of Origin
UEAAC	Centre for Competition Policy, University of East Anglia	United Kingdom

Table 3 - Overview of respondents – Respondent group

The table below lists the respondent by country.

Country	Type of organisation
Belgium	Type of organisation
ORES- Opérateur des réseaux gaz et électricité	DSO
Bulgaria	Type of organisation
EVN Bulgaria	Energy Supplier
Czech Republic	Type of organisation
Cez Trade	Energy supplier
RWE Transgas, a.s.	Energy Supplier
Denmark	Type of organisation
Energinet.dk	TSO
Danish Consumer Council	Consumer Organisation
EU	Type of organisation
BEUC – European Consumer Organisation	Consumer Organisation
European Federation of Local Energy Companies	Energy Supplier Organisation
Eurelectric	Energy Supplier Organisation
EUROGAS	Energy Supplier Organisation
Groupement Européen des entreprises et Organismes de	Energy Supplier

Distribution d'Energie	
France	Type of organisation
EDF	Energy Supplier
Médiateur national de l'énergie	Consumer Organisation
Germany	Type of organisation
E.ON AG	Energy Supplier
RWE AG	Energy Supplier
Verband kommunaler Unternehmen e.V.	Energy Supplier Organisation
Verivox GmbH	PCT
vzbv- Verbraucherzentrale Bundesverband e.V.	Consumer Organisation
Greece	Type of organisation
Public Power Corporation	Energy Supplier
Italy	Type of organisation
Edison SpA	Energy Supplier
Netherlands	Type of organisation
Alliander	DSO
Benergy BV	PCT
eMeter	PCT
The Switch Company	PCT
Poland	Type of organisation
Vattenfall Sales Poland Sp.o.o.	Energy Supplier
Portugal	Type of organisation
EDP – Energias de Portugal, SA	Energy Supplier
Spain	Type of organisation
Gas Natural Fenosa	Energy Supplier
IBERDROLA	Energy Supplier
Sweden	Type of organisation
Sweden Energy	Energy Supplier Organisation
Oberoende Elhandlare	Energy Supplier Organisation
United Kingdom	Type of organisation
Consumer Focus	Consumer Organisation
EDF Energy	Energy Supplier

Scottish and Southern Energy	Energy Supplier
Centre for Competition Policy, University of East	Academic
Which?	Consumer Organisation

Table 4 – Overview of respondents - Country of origin

Annex 4 - Evaluation of responses

The following represents the answers given by the stakeholders in reference to the questions asked. The table identifies the number and type of respondents who agree or disagree with the draft recommendations and their comments. CEER's position is presented in the second column.

Respondents' feedback	CEER's position
I Independence of the tool	
Recommendation 1: Any price comparison tool should be independent, giving the user a non-discriminatory overview of the market. The provider of a price comparison tool should show all information in a consistent way.	
Overall, all respondents agreed that PCTs should be independent and show information in a consistent way.	Noted
One Energy Supplier and one Energy Supplier Organisation asked for a more precise definition of independent. Some respondents including a Consumer Organisation specifically stated that independence must mean independence from energy suppliers and/or resellers. One Consumer Organisation stated that any companies affiliated with suppliers should not be considered independent. Another Consumer Organisation suggested that PCTs shouldn't include supplier advertising.	Noted
Two Consumer Organisations said that any commission received, or advertising orders, should not influence the ranking of a tariff or the consistency of information. One Energy Supplier said consistency is important, but this should not compromise accuracy.	Agree
One PCT provider suggested that unannounced audits and random checks can be used to check PCTs are independent.	Agree this is an option to monitor compliance, but not a requirement.
One PCT provider suggested that utilities should provide bill data, meter readings and tariff data to ensure consistent data.	Disagree due to potential privacy issues. The customer can provide this information if they wish to.
Another PCT provider said that PCT's should operate according to national regulations but should have the freedom to decide how to present information.	Disagree. Some freedom to innovate is appropriate but it shouldn't allow data to be manipulated and

Respondents' feedback	CEER's position
	should present information in a consistent way.
Two respondents, one Energy Supplier Organisation and one Academic noted that importance consumer confidence in PCTs.	Agree
One Energy Supplier said that all relevant price information should be included such as distribution costs so consumers can see what they will pay.	Noted. This depends on the structure of tariffs. Important that information is clear and easy to understand.
One Consumer Organisation said PCTs have to be careful not to be abused by suppliers, for example if suppliers create lots of new tariffs so they always appear at the top as the cheapest.	Agree. Suppliers have a role to play to ensure their tariffs are clear.
Recommendation 2a: Regulatory oversight of privately-run price comparison tools is important to bolster the confidence of the customers. This should be the responsibility of the NRA, or another public body.	
<p>Overall, five respondents disagreed with this recommendation and thirty agreed. Consumer Organisations stressed that regulatory oversight of privately-run PCTs is vital and effective enforcement mechanisms needed.</p> <p>Those respondents who supported this recommended stated that regulatory oversight provides consumer confidence, ensures accuracy and independence [the aims of recommendation 1] and ensure quality. Those respondents who agreed with this recommendation suggested a number of different routes to oversee PCTs: regulation, accreditation, legislation, voluntary codes of conduct or self-regulation.</p>	Noted
<p>Three Consumer Organisations, two Energy Suppliers and one Energy Supplier Organisation said that regulatory oversight of privately run PCTs is important to ensure it is accurate and independent and the information is impartial. Similarly, accreditation schemes should be overseen by NRAs.</p> <p>One Energy Supplier said PCTs should be accredited and governed by a recognised body.</p>	Agree that oversight is necessary should ideally be by the NRA or another public body.
Three Energy Suppliers and one Energy Supplier Organisation said that NRAs have a role to monitor PCTs. Another Energy Supplier noted that an approved standard for PCTs, set by the NRA or another authority is helpful but that doesn't mean the PCT needs to be approved by the NRA.	Agree that monitoring by the NRA is important.

Respondents' feedback	CEER's position
Two Energy Suppliers said that if self-regulation turns out to be insufficient then regulatory oversight could be considered.	Agree – though with self-regulation there may be a role for the NRA or a public body to monitor.
One Energy Supplier stated that the best solution should be identified for each country, noting the Confidence Code voluntary scheme run by a consumer association in the UK and the regulatory oversight that takes places in Spain.	Agree – in both of these cases the NRA or a public body are actively involved.
One Energy Supplier and one Energy Supplier Organisation acknowledged the importance of the oversight body being recognised and trustworthy was mentioned.	Agree
One PCT provider suggested that blogs for consumers to record comments/experiences can also help to bolster confidence.	Note, we recognise the possibility that blogs can bolster confidence, however CEER does not suggest that every PCT should link to, or have a blog/forum.
Two Energy Supplier Organisations who did not agree with this recommendation said that there should only be as much regulation as necessary. A PCT provider who did not agree with this recommendation said that ensuring customer confidence is in the interest of the PCT. Another PCT provider who did not agree with this recommendation recognised that regulatory oversight is required but that regulation should be limited to preventing misleading consumers and illegal practices.	We agree that there should only be regulation where necessary. However, as PCTs are key tools for consumers it is important that necessary steps are in place to protect and empower consumers.
One consumer organisation said that active enforcement mechanisms are necessary, whether regulatory oversight or accreditation is used. One PCT provider said that random announced checks can help to bolster confidence.	Agree – appropriate enforcement procedures need to be in place alongside the regulatory framework
One PCT provider said that any audits must be efficient, weighing up the cost to the NRA, PCTs and the consumers. They also stated that there is a role for on-line, printed and broadcasting media to communicate such information.	Agree – audits can be helpful and should offer value for money
Some respondents including a Consumer Organisation said there should be scope for innovation in the provision of the price comparison service, particularly where consumers have a choice of provider. They went on to say that while choice of whether to offer different products and incentives should be preserved; the nature (e.g. terms and conditions) of such offers should be governed by minimum standards enforceable through regulation.	Agree

Respondents' feedback	CEER's position
One Energy Supplier stated that the role of the oversight should be specified in more explicit way.	Oversight can be via regulation or accreditation of PCTs by NRAs or another public body
Recommendation 2b: Alternatively this could be left to self-regulation by the industry through instruments such as voluntary codes of conduct.	
This question prompted mixed responses. Overall 16 respondents agreed that PCTs could be controlled via self-regulation and 18 respondents disagreed. Consumer organisations disagree with this recommendation and are concerned with the absence of enforcement mechanisms.	Noted
One DSO noted that market-based instruments put fewer burdens on the NRA.	Agree
A voluntary code of conduct was seen by some as a good basis for accreditation or an alternative to regulation by two PCTs, two Energy Suppliers, one Energy Supply Organisation and one Energy Distribution Organisation. A voluntary code also enables other companies to enter the market and offer choice to consumers. Two Energy Suppliers and one Energy Supply Organisation said that such self-regulation should offer the same degree of impartiality and regulatory oversight.	Agree – we feel that self-regulation can be done well and there is a role for the NRA to oversee how standards are set and met.
One Energy Supply Organisation said that if a voluntary code was found to be insufficient regulatory oversight should be considered.	Agree
One Energy Supplier thought regulation or self-regulation should be chosen as appropriate to the country's market.	Agree
Nine respondents did not agree with this recommendation: three Consumer Organisations, four Energy Suppliers, one academic and one Energy Supply Organisation. One Consumer Organisation was concerned that self-regulation is difficult to enforce and there is a conflict of interest in the industry doing so. One respondent disagreed with this recommendation as it may not enable equitable comparison between tariffs.	Disagree – we feel that self-regulation can be done well, however there is a role for the NRA or a public body to oversee how standards are set and met.
Voluntary codes of conduct should be monitored or accredited by NRAs or other public bodies. This point was made by three Consumer Organisations, two Energy Suppliers and two Energy Supply Organisations. One Energy Supplier said oversight need not be the role of the NRA however high standards should be set and monitored. Many stakeholders who agreed with this recommendation also stated that there was a role for NRAs to monitor PCTs or any industry standard.	Agree – even if an industry code/self-regulation is established there is still a role for the NRA to at least monitor how these sites operate.

Respondents' feedback	CEER's position
One Energy Supply Organisation suggested that voluntary codes of conduct should be developed with stakeholders. One TSO commented that in Denmark a reference group provide input which is not binding.	Agree
One PCT provider said KPIs [key performance indicators] for customer service can be established by companies.	Agree this could form part of the voluntary code
II Transparency	
Recommendation 3: Price comparison websites should disclose the way they operate, their funding and their owners/shareholders, to provide a transparent service to customers.	
Overall, all respondents agreed that PCTs should disclose the way they operate, their funding and their owners/shareholders, to provide a transparent and trusted service to customers. Consumer Organisations stress that this could be complex information and that it should be provided in an understandable manner.	Noted
<p>Respondents suggested the following information be included:</p> <ul style="list-style-type: none"> • Funding arrangements especially commission paid or fees received either directly or indirectly by a supplier, third party or agent. • A statement of who operates the PCT. • A single list which identifies all suppliers from whom the site receives a commission. • Information should be displayed prominently on, or be accessible from, the price comparison results pages. • Information about owners or shareholders. • The method used to calculate the cost of energy billing. • No advertising from suppliers should be allowed on comparison websites. 	<p>Agree that the price comparison websites should disclose the way they operate, their funding and their owners/shareholders, to provide a transparent service to customers.</p> <p>Any additional information requirements should be set out in the regulations or voluntary code for the member state.</p>
One Consumer Organisation said that information on funding and governance can be complex and such information should be clear and easy for the consumer to understand and access.	Agree that information should be clear for consumers
An Energy Supplier said that such information should be guaranteed irrespective of the way the	Agree

Respondents' feedback	CEER's position
PCT is run.	
One Energy Supply Organisation suggested this recommendation would have as positive side effect that it would additionally lead to a neutrality of treatment of suppliers regarding the payment of commission for procured contracts by the price comparison tool.	Agree
Two Energy Suppliers said the NRA should consider whether there are also other ways through which price comparison website can receive financial contribution from market parties.	Noted
III Exhaustiveness	
Recommendation 4: When possible, all prices and products available for the totality of consumers, if relevant to the customer, should be shown as a first step. However, if the presented information doesn't give a complete overview of the market, the price comparison tool should clearly state this before showing the results of the price comparison. Filtering of results should be offered to the customer to select the offerings corresponding with his or her preferences.	
Overall, 31 respondents agreed with their recommendation and four did not. Consumer Organisations added that PCTs should provide the consumer clear information on the extent of exhaustiveness.	Noted
Five Energy Suppliers, three Consumer Organisations, two PCTs and one DSO agreed that all available appropriate products and services should be displayed at the very beginning and then the consumer should be offered the ability to filter results. Filtering can account for customers' particular preferences and reduce the number of options.	Agree
One Energy Supply Organisation noted that some offers disappear or change after a certain period so providing accurate information could be problematic, if it does not reflect the actual competitive situation in the retail market.	Disagree. Data needs to be accurate, regularly reviewed and up dated.
Four respondents thought information should be tailored up front rather than show all tariffs.	Disagree. There is a risk that consumers will make choices based upon limited information.
One Consumer Organisation and one PCT noted that where it is not possible to show all tariffs, the site should state that the selection is limited and the criteria for limiting the information.	Partly agree. Any pre selection criteria should be essential, basic information such as post code. This will not cause a barrier to entry. Following that, further filtering can be done to refine choices.

Respondents' feedback	CEER's position
<p>One Energy Supplier suggested that PCTs show all tariffs unless the site takes the customer through a qualification journey prior to presenting the options.</p>	<p>Partly agree. This could be an option for the consumer if it does not present a barrier to participation.</p>
<p>Filtering can account for a range of different customer needs or product offers. Respondents suggested that filtering could identify:</p> <ul style="list-style-type: none"> • payment types (prepayment, direct debit, bank transfer), • the frequency of billing, • whether the consumer can switch today, • those tariffs which they cannot switch to directly from the PCT, • the energy supplier's customer service rating, • fixed or floating prices, • contracts terms, • the energy mix, • settlement based on (forecasts, real consumption), • and other items that may come up (additional services as: guaranteed prices, insurance, green product). 	<p>Noted. Payment type and frequency of billing are important criteria for consumers to choose.</p> <p>Any other specific information requirements could be set out in the regulations or voluntary code for the member state.</p>
<p>One Energy Supplier noted that there continues to be a disproportionate focus on 'price' and providing other information can help consumers choose.</p>	<p>Noted</p>
<p>One Energy Supply Organisation said that it will be difficult to fulfil the goal of exhaustiveness if the price comparison tools demands a fee from the electricity suppliers in order to show their offers on the website. They considered it may be more logical to demand a fee when customers switch suppliers.</p>	<p>Noted. Ideally PCTs will be exhaustive and include all suppliers. Commercial relationships must be transparent. It may be better for suppliers (especially smaller suppliers) to pay per customer rather than pay an entry fee to be included on the PCT.</p>
<p>Two Energy Supplier Organisations and one Energy Supplier said PCTs should be flexible enough to include a range of products to allow and accommodate innovation.</p>	<p>Agree</p>
<p>Some stated it must remain the supplier's choice whether all or some of their tariffs appear on a</p>	<p>Noted. PCTs should be as comprehensive as</p>

Respondents' feedback	CEER's position
<p>privately run PCT. One Energy Supplier said that the impact of a customer being misled via a poor comparison tool directly affects the reputation of the supplier. Conversely one Energy Supply Organisation said if a PCT is popular and respected; there will be an incentive for energy companies to have their products published on it.</p>	<p>possible. The regulation/code should ensure that the PCT service is respected and provides good customer service.</p>
<p>A number of comments were made about the provision of data from suppliers. Some noted that, ideally, the price comparison tool has a data-supply-agreement in place, but sometimes this is not possible. Four Energy Suppliers and one Energy Supply Organisation thought there should be no obligation for automated data transfer from the suppliers' systems to websites in support for the comparison. This should be based on commercial arrangements between the supplier and the PCT. One PCT noted that price comparison tools are dependent on data supplied by energy suppliers and grid operators, that if there is no such agreement, and no easy access to data, then a complete overview of the market cannot be expected of the PCTs. One Consumer Organisation suggested that a tariff database must be established that suppliers are obliged to submit data to.</p>	<p>Agree that data provision should be based on commercial agreements between the PCT and suppliers. These arrangements should not present a barrier to a supplier participating. However PCTs shouldn't enter into arrangements that aren't compatible with our goals to be exhaustive and transparent.</p>
<p>One Consumer Organisation questioned how much judgement a PCT operator should use. For example, whether the PCT should be allowed or expected to exclude tariffs that are confusing or misleading or tariffs that may have caused a lot of consumer's problems. They went on to ask whether the PCT should discontinue presenting such information.</p>	<p>Noted. If the regulation/code is strong and clear this is unlikely to be a concern. Such issues should be raised with the NRA or relevant public body. There is a role for suppliers to consider the clarity of the tariffs they offer.</p>
<p>Recommendation 5: The customer should be able to specify a request by entering specific data, if the customer wishes to include individual components (not applicable for the totality of customers) into the comparison, such as his/her yearly consumption. It is important to help the customer to determine his/her yearly consumption as accurately as possible.</p>	
<p>Overall, 33 respondents agreed with this recommendation that customers should be able to enter specific data and two organisations did not agree. Consumer Organisations added that the tools to do so should be clear and simple. Also, the conditions under which a consumer provides the specific data should meet privacy protection legislation.</p>	<p>Noted</p>
<p>Eight Energy Suppliers, three Energy Supply Organisations, one Consumer Organisation, one PCT and one Academic thought that consumers should be able to filter or personalize their search queries by providing relevant information. These tools should be easy to use and understand.</p>	<p>Agree. Consumers should be able to filter results and that suppliers have a role to make this information clear on the bill.</p>

Respondents' feedback	CEER's position
<p>Some respondents, including an Energy Supply Organisation noted the importance of helping consumers to determine their consumption. One Energy Supply Organisation and one Consumer Organisation suggested that standardised consumption values may be provided, for example differentiating by region or property type and that each member state should have a standard practice for determining yearly consumption. Respondents said that such calculations should be transparent.</p>	<p>Agree. Ideally, consumers will input all relevant information. However, if they don't have access to that information, standardised data can be helpful.</p>
<p>However, a Consumer Organisation and a PCT suggested that customers should receive price comparisons relevant to their actual consumption and should be encouraged to input their actual consumption. One respondent noted the responsibility of the consumer consumers to enter accurate information in order to get the best comparison.</p>	<p>Partly Agree. Ideally, consumers would input all relevant information, but if they don't have access to that information, standardised data can be helpful.</p>
<p>One Consumer Organisation identified the benefit of giving consumers a choice of what information to provide. For example, entering annual consumption (in kWh), the cost of their monthly or yearly bills or an average reference consumption is used. Alternatively one Energy Supplier suggested that customer be given the choice of the "easy" or "advanced" searches and filtering.</p>	<p>Agree. Such choice can enable consumer engagement and help more consumers.</p>
<p>On data protection one Consumer Organisation suggested that the price comparison website shall use the information provided exclusively for the specific query and comply with Data Protection legislation.</p>	<p>Agree</p>
<p>The two Energy Suppliers who disagreed with this recommendation suggested that filtering information can be helpful, but should not be a requirement on PCTs. This can allow privately run PCTs to differentiate themselves in the market. Conversely, a PCT said that price comparisons are of minimal value without customer-specific data.</p>	<p>Disagree. Consumers should always have the choice to filter data to find the right tariff for their circumstances.</p>
<p>One PCT noted that when the Green Button Initiative of the White House goes live, customers will be able to log in, see their detailed electricity usage data (up to 13 months worth) by downloading it on file on their computer. It is not dependent on smart meter data.</p>	<p>Noted</p>
<p>One Consumer Organisation recommended that the results of the comparison be given quickly so that the consumer does not give up.</p>	<p>Agree</p>

Respondents' feedback	CEER's position
<p>IV Clarity and Comprehensibility</p>	
<p>Recommendation 6: Costs resulting from the price comparison should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of the unit kWh-price. However, it is also very important to indicate clearly that prices shown as a total cost are an estimation, as they are based on historic consumption and – in the case of floating tariff products – unit prices that are susceptible to change during the contract.</p>	
<p>The vast majority (33 out of 36) agree with the above recommendation to clearly and explicitly show the costs on the basis of the contract duration. Only one supplier, one energy supplier organisation and one PCT provider disagrees with the recommendation. Consumer organisations add that information should be presented in an understandable manner, especially when special offers are considered. A suggestion is made for a common format for tariffs.</p>	<p>Noted</p>
<p>For eight of the respondents composed by two Consumer Organisations, three Energy Supplier Organisations as well as three energy suppliers the information displayed should be easily understandable for the consumer and special offers should be fully explained.</p>	<p>Agree</p>
<p>However, for seven respondents composed of one Consumer Organisation, Energy Suppliers, one DSO, two Energy Supplier Organisations as well as one PCT provider the choice for the consumer should not be restricted and other important information should be presented as well in order to improve consumer's knowledge. Therefore, a breakdown of characteristics/ features of each product is suggested.</p>	<p>Partly agree – an overload of information might lead to the confusion of consumers.</p>
<p>Seven of the respondents representing one PCT provider, two Energy Supplier Organisations, two Consumer Bodies and two Energy Suppliers claim a yearly cost overview (or at least for the contract duration) with e.g. unit prices.</p>	<p>Agree</p>
<p>Two Consumer Organisations and one Energy Supplier think it would be necessary to easily integrate new tariff schemes and even create a common format for tariffs (for the latter only one consumer organisation). One Consumer Body asks for a regular update of the price energy structure.</p>	<p>Disagree – a common format for tariffs is not foreseen in every Member State for the moment.</p>
<p>Eight Energy Suppliers and one Energy Supplier Organisation indicate that prices displayed are only estimates (even though it should be the most accurate estimation) and consumers should</p>	<p>Agree</p>

Respondents' feedback	CEER's position
<p>be made aware of this fact.</p> <p>For one Energy Supplier and one Energy Supplier Organisation there will always be a mismatch between the prices presented by the PCT and the final bill of the consumer as the actual consumption is unpredictable and depends on external factors such as the weather.</p>	
<p>One PCT and two Energy Suppliers ask to show energy taxes separately as they might confuse consumers.</p>	<p>Agree – important in terms of consistency.</p>
<p>One Consumer Body fears that a binding Code of Conduct for PCTs is not binding energy suppliers and their offers (as they are not accredited).</p>	<p>Partly agree – PCT has to make sure that offers are accurate and up to date.</p>
<p>For one TSO, NRAs should give clear guidelines on how to calculate and present costs.</p>	<p>Partly agree – not in the competency of each NRA.</p>
<p>In the opinion of one Energy Supplier Organisation detailed aspects can be left to the PCT design.</p>	<p>Agree</p>
<p>One Energy Supplier believes that users should be alerted of the validities of each promotion.</p>	<p>Agree</p>
<p>The Academic considered that achieving both simplicity and understand-ability of the tool at the same time is a delicate balance.</p>	<p>Noted - it is a challenge to be reached.</p>
<p>One Energy Supplier states that PCTs are restricted to those able/ willing to use computers (problem of the elderly generation).</p>	<p>Partly agree - even though there might be other tools for the elderly.</p>
<p>For one of the PCTs, consumers should be provided with information on (1) the last 13th months of interval data, (2) the metering read of the starting of the billing period and (3) prices and tariffs. According to their opinion, tariffs should be simplified with charges limited to daily charges and a cost per unit of energy consumed. In addition, only smart meters will enable consumers to better understand and reflect their consumption behaviour.</p>	<p>Noted</p>
<p>Furthermore, according to one Energy Supplier the PCT always needs to be based on objectively comparable characteristics.</p>	<p>Agree</p>
<p>In the view of one Energy Supplier Organisation, the simplification of the PCT should not lead to</p>	<p>Agree</p>

Respondents' feedback	CEER's position
restrict the customer's view of the product types available.	
Recommendation 7: Fundamental characteristics of all products – such as fixed tariff products versus floating price products - should be presented on the first page of the result screen. This differentiation should be easily visible to the customer.	
Overall, all respondents agree to present fundamental characteristics of all products on the first result page in order to enable consumers to choose a product according to their preferences. Consumer organisations stress the simplicity of the presented information and suggest that all complex concepts should be explained on a subsequent page. A suggestion is made for NRAs to develop a common tariff vocabulary.	Noted
For fourteen respondents comprised by three Consumer Organisations, seven Energy Suppliers, three Energy Supplier Organisations as well as one Academic complex concepts should be explained on a subsequent page. Such information needs to be easily available and should not be too exhaustive.	Agree
Two Energy Suppliers and two Energy Supplier Organisations are asking to alert consumers of the validities of offers.	Agree
Two Energy Suppliers and one Energy Supplier Organisation think customers should be able to choose a product according to their preferences. Therefore, one Energy Supplier is convinced a drop down option might be a solution.	Agree
Two Consumer Bodies believe that NRAs could develop common tariff vocabulary and common tariff naming.	Partly agree - common tariff vocabulary as such is indeed a good idea but is not in the competency of each NRA.
Two Energy Suppliers are not in favour of comparing fixed and indexed prices without explanatory warnings.	Agree
For two Energy Supplier Organisations the following information should be considered: liquidity of the supplier, duration of the offer, duration of the price validity of the offer, price valid only for new customers or also for existing ones and clear indication of bundled offers.	Agree

Respondents' feedback	CEER's position
Two Energy Suppliers think that there should be no difference between the product offered on the PCT and the corresponding contract. For them it should be also clear how and when cash backs are offered.	Agree
In the opinion of one Consumer Organisation the additional effect on CO ₂ emissions of each energy product should be listed in a clear and unambiguous manner.	Agree
One Consumer Body questions whether all different characters of a product can be rationally evaluated by a PCT.	Noted
Recommendation 8: The price comparison tool should offer additional information on products and services. This information should be available with additional details on a separate page so the customer has the choice to look at this information or not.	
Overall, the vast majority (32 out of 36) of respondents agrees to display additional information on products and services on a separate page so that the full characteristics are available. Only some respondents (4 out of 36) are not in favour of this recommendation. Consumer organisations stress that information should be understandable and comparable and also note that other conditions besides price are also very important.	Noted
One Consumer Organisation, three Energy Suppliers, one Energy Supplier Organisation, one DSO organisation and one PCT suggest that PCTs should include all available additional information in an understandable and comparable manner.	Agree
One Energy Supplier Organisation, one Consumer Body and two Energy Suppliers recommend displaying important points of the contract on the first page but to present information on additional services on a subsequent page. One Consumer Body (FBRDK) says that additional information should contain important contractual conditions including those which diverge from commonly used conditions.	Agree
In contrast to that, one Energy Supplier Organisation wants special services to be presented on the first page already.	Disagree
One DSO and one Energy Supplier think additional imposed information should not be available as it would provoke a negative attitude or avoidance of the tool.	Disagree – additional information should be provided.

Respondents' feedback	CEER's position
One Energy Supplier and one Energy Supplier Organisation believe that there should be guidelines for the minimum content of the first page. Contrary to this, one Energy Supplier Organisation thinks that it should be left up to the provider which information they include or display.	Noted
Two Consumer Bodies, one Energy Supplier Organisation and one Energy Supplier think that energy contracts cannot exclusively be evaluated on the price of the energy, other conditions are equally important.	Agree
One Consumer Body insists on information on “green energy” which should be restricted to offers with additional impact on the production of RES and should have a sustainable effect on the environment as well.	Agree
Two Consumer Bodies are in favour of the UK model of a “Tariff Information Label” which is a key fact document.	Noted
On the one hand, two Energy Suppliers think that it should be open to the PCT to decide which information is displayed or not. They propose to insert a “free text” for additional information on characteristics the supplier considers as relevant and not present a structured separate page.	Partly agree – design can be left up to PCT but additional information on a subsequent page.
On the other hand, two Energy Supplier Organisations consider this information as highly important and so to them it should be displayed on the first page, especially when it is possible to sign a contract through the PCT.	Partly agree – too much information on the first output screen might lead to the confusion of consumers.
Recommendation 9: If regulated prices exist, they have to be highlighted visibly in the default presentation of the price comparison tool.	
Again the vast majority (33 out of 36) of stakeholders agree to highlight regulated prices if they exist. Some respondents (3 out of 36) are not in line with the recommendation. Consumer organisations add that it should be clear for a consumer that regulated prices are not per se better than non-regulated offers.	Noted
For four Energy Suppliers and one Energy Supplier Organisation this differentiation only makes sense if regulated and non-regulated prices coexist in a market.	Agree
In the opinion of two Consumer Bodies, one Energy Supplier and one DSO additional information on the competent authority, the rationale used and upcoming modifications should be	Agree

Respondents' feedback	CEER's position
displayed at the first page of results.	
One Energy Supplier doubts that regulated prices are always the cheapest available in a market.	Noted
Another Energy Supplier states that in Bulgaria, besides network tariffs, electricity prices are regulated for a wide range of consumers.	Noted
One Energy Supplier thinks regulated prices should only exist for vulnerable consumers.	Disagree
One PCT notes expected or announced price changes or the expiration date have to be updated by the supplier.	Agree
To one PCT, consumers care more about the level of tariffs than if they are regulated or not.	Noted
In addition, for two PCTs and one Energy Supplier, highlighting regulated prices should not imply that those are better tariffs although they must not immediately be the best ones existing in a market. Sometimes, regulated prices are only available for a specific group of consumers (vulnerable ones).	Disagree
V Correctness and accuracy	
Recommendation 10: Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.	
Again the vast majority (34 out of 36) of respondents agreed upon the recommendation to update the price information of the PCT as often as necessary. Consumer Organisations state that NRA's should play an important role in supervision. They add that a date stamp should be provided for the last update.	Noted
Nine Energy Suppliers, two Energy Supplier Organisations, one DSO and one Consumer Organisation explicitly stress that the information displayed should be accurate and up to date. Moreover, they agree that the date of the last update should be shown. However, the respondents provide different time frames within which the new price has to be displayed on the PCT: within 24h, within 2 working days, within 5 working days and as soon as possible.	Agree

Respondents' feedback	CEER's position
According to two Consumer Organisations, three Energy Suppliers, two Energy Supplier Organisations the owner of the PCT should be responsible for their information being correct. Furthermore, consumers have to be informed about the liability of the tool and the means to redress in a case of poor service.	Agree
Three Energy Suppliers state that updates concerning taxes should be made by the responsible authorities.	Disagree
Three respondents also believe that the supervision of the correctness of the tool as well as the relevant time of introduction rests in the responsibility of the NRA.	Disagree – in some Member States PCTs are run privately.
For one Consumer Body warnings must be foreseen on offers susceptible of being inaccurate due to impending price changes.	Agree
For one Energy Supplier offers expired should be immediately eliminated from the results.	Agree
One DSO wants to keep historical data (up to one year) to enable the consumer to compare current and historical prices as well as the evolution of prices.	Agree
One PCT underlines the importance that the PCT provider must have access to updated price information thus to energy suppliers, grid operators and NRAs.	Agree
Two Energy Supplier Organisations disagree with this recommendation. They mention that the publication of future prices is restricted in some cases by national law. For instance, changes in prices can only be published 6 weeks before the implementation. In addition, they fear in case the supplier is responsible for the update, the proceeding is seen as too complex and might even lead to distortion of competition.	Noted
VI User-friendliness	
Recommendation 11: The user should be offered help through default consumption patterns – or preferably – a tool that calculates the approximate consumption, based on the amount of the last bill or on the basis of other information available to the user.	
All of the respondents agree to offer tools to help consumers calculating their approximate consumption. It is seen as an important factor in terms of user-friendliness and accuracy.	Noted

Respondents' feedback	CEER's position
Consumer organisations add that consumption patterns should be available in the market as to make the offer as accurate as possible. Also a suggestion is made for all PCTs within one country to use the same methodology for comparing prices.	
Four Consumer Organisations, five Energy Suppliers, one PCT and two Energy Supplier Organisations agree that consumers should be given the choice regarding the amount and type of information they want to enter.	Agree
One Consumer Body, one PCT and three Energy Suppliers claim that consumers should have the possibility of entering their yearly, quarterly or monthly consumption. Alternatively, four Consumer Organisations, two Energy Supplier Organisations and one Energy Supplier believe that consumers should be able to describe the type and size of their household, people living in it etc. in order to calculate an approximate consumption. One Energy Supplier supports a “mi-data” solution where customers can readily transfer their consumption data to a third party.	Agree
Three PCTs, one Consumer Organisation, one Energy Supplier and one Energy Supplier Organisation claim that default consumption patterns should be available in the market as they are indispensable in terms of user-friendliness and accuracy.	Noted
One Energy Supplier and one Energy Supplier Organisation think the scope of the information requested from the consumers as an input to their search should be limited as well as data privacy has to be guaranteed.	Agree
One Energy Supplier and one Energy Supplier Organisation ask for a clear distinction between PCTs provided by public authorities and privately owned ones.	Agree
Two Energy Suppliers believe that independence, transparency and clarity of the tool should be considered as prerequisites although user-friendliness and accuracy are seen as important.	Disagree – all principles are equally important.
One Energy Supplier thinks that there should be two menus: a basic one to enter necessary data to compare prices and an additional menu where consumers may specify additional parameters of the offer.	Agree
One Consumer Body suggests that comparison should be based upon a unit rate only.	Disagree

Respondents' feedback	CEER's position
One Consumer Body demands that PCTs in a national market should use the same methodology for their comparison.	Agree
VII Accessibility	
Recommendation 12: At least one additional communication channel (other than the Internet) for getting a price comparison should be provided free of charge or at minimal cost.	
30 out of 36 respondents agree with this recommendation, although many respondents claim that this should be an optional recommendation rather than a prerequisite, notably where private comparison tools are concerned. Consumer organisations added that the needs of vulnerable customers should be taken into account when providing another communication channel. Other respondents noted the importance of comparability of the results between the different channels. Those respondents that disagree are mainly from the industry.	Noted
A Transmission System Operator and an Energy Supplier Organisation claim that the amount of people that are unable to use the internet is decreasing steadily.	Noted, but those that are not able to use the internet should be able make use of an alternative a channel to compare prices.
A Transmission System Operator, an Energy Supplier Organisation and an Energy Supplier suggested that the recommendation should be voluntary.	Disagree. Not in all countries the access to internet is widely available. In those cases alternative channels should be available
A Price Comparison Tool added that they have experienced that there is no necessity for other means than on-line and by telephone.	Noted
One Consumer Organisation added that additional channels should be completely free of charge.	Disagree. Ideally the service should be completely free of charge. However, especially for private comparison tools the service should be allowed to be offered to a minimal cost.
Six respondents, four Consumer Organisations and two Energy Suppliers add that these channels shall be adapted to special consumer needs, including those that do not have access to the Internet, and shall be available on formats that meet the needs of vulnerable consumers.	Agree
Two Consumer Organisations add that the single point of contact or consumer associations to	Disagree, unless this single point of contact also

Respondents' feedback	CEER's position
use the PCT and offer the results to consumers, therefore serving as points of information for price comparison queries that cannot be done online	serves as a price comparison tool.
Seven respondents, two Consumer Organisations, two Comparison Tools, two Energy Suppliers and one Energy Distribution Organisation suggest alternative channels or means to provide information, such as: telephone, paper, consumer magazines, factsheets, a drop-in service, postal service	Noted
One Energy supplier stated that it might be difficult to provide a clear and tailor-made picture by phone (lot of figures). And it may also require additional resources.	Noted
Five respondents, three Energy Suppliers, one Energy Supplier Organisation, and one confidential respondent note that where these alternative channels are available the results obtained should be consistent with the ones from the price comparison websites.	Agree, the methodology on which comparison are based should be the same, so results can be compared between different price comparison tools
Five respondents, two Energy Suppliers, one Energy Supplier Organisation, one Consumer Organisation and one confidential respondent stated that the use of additional communication channels should not be precluded. If there is a need for alternative communication channels, it is likely that in a competitive market, private parties will try to meet this need by offering these services.	Disagree, it is likely that the market will or cannot provide for such a tool.
Three respondents, two confidential respondents and one Energy Supplier Organisation add that providing a service free of charge or at a minimal cost to the consumer should not result in allocating costs to suppliers. Ideally, the cost of providing those additional services should be borne by those agents operating comparison tools.	Noted
One confidential respondent agrees in part and states that nearly all consumers have Internet access, though they may need to go to a library or other access point. More importantly, the comparisons are of only limited value if nothing is known about the consumer's consumption level or pattern.	Disagree – this is true for some member states, but not all.
Two respondents, one Energy Supplier and one Energy Supplier Organisation state that it should not be necessary for all comparison websites to offer an additional communication channel. Provision of an alternative channel could be achieved by a third party, i.e. consumer advice body offering to carry out an online search on the customer's behalf via a telephone	Agree, as long as there is such an alternative available.

Respondents' feedback	CEER's position
service.	
<p>One Energy Supplier adds that alternative channels should have the following conditions: In case of telephone consultation, the client must provide as much information in order to avoid misunderstandings, In case of written correspondence, it shall be standardized (par exemple – form), and also as clear and understandable as the price comparison tool on the web.</p>	Noted
<p>One confidential respondent adds that any private initiative should offer alternative contact beyond internet. For a regulator's PCT it is enough to show every company contact details, so user can send any question on offers shown directly with the company for further detail information.</p>	Disagree
<p>One confidential respondent mentioned that offering the choice of a second language in the price comparison tools should be a way to make the tool accessible for everybody.</p>	Noted
<p>Two Energy Suppliers add that information provided should remain at the discretion of the supplier.</p>	Noted
<p>One confidential respondent added that only with regard to certain routes such as 'customer generated' inbound telesales. With regard to outbound telesales, some service provider's operated 'customer contact' strategies that are not in the best interest of the consumers, and can ultimately bring the image of proper website comparison service provision into disrepute adds that only if it is the NRA or another public authority that is responsible for providing this information. We do not think that private electricity suppliers should provide this information.</p>	Noted, a PCT should always be clear about its intentions.
<p>One Academic respondent states this may be an expensive option and companies may have an incentive to make it unattractive to reduce costs (e.g. long telephone waiting times). In general, if the price comparison websites are to be profitable, it may be important to consider carefully restrictions which may reduce the attractiveness of entry.</p>	Noted
<p>One Energy Supplier adds that the telephone call charge from the helpline should be SPL - Split Charge (part of the connections price is paid by the provider of the comparison tool and a part is transferred to the customer).</p>	Noted, as long as it is clear for the customer what the costs will be and as long as they will be minimal.
<p>One Consumer Organisation mentions that NRAs that wish to facilitate a competitive market for price comparison services (as in GB), should consider the potential for such a requirement to</p>	Noted

Respondents' feedback	CEER's position
<p>drive smaller providers out of the market. It may be that a firm's turnover or volume of switches should be used as a determinant of whether offline access should be provided. NRAs should also consider that even if offline consumers are able to access price comparison tools, they may not be able to access the most competitive deals, which are generally only available to those who receive their bills and manage their account online and pay by direct debit.</p>	
<p>Two respondents, one Energy Supplier Organisation and one Transmission System Operator disagree, because other communication channels are less suitable channels for price comparisons: data could be out-of-date and the correctness of the data is an issue.</p>	<p>Noted, although, these risks are also prevalent within online PCTs. Therefore, accuracy and correctness remain a recommendation, also for offline PCTs.</p>
<p>One Energy Supplier Organisation disagrees and states that for the use of offline services customers need to pay a fee due to the cost for providing offline information.</p>	<p>Disagree, as long as the costs remain minimal and are known by the customer, offline services are a recommendation.</p>
<p>One Energy Supplier Organisation disagrees that this should be an obligation, but recognizes the value of additional communication channels, subject to cost considerations. Comparison websites can also provide services by telephone, which are of value to those without ready internet access.</p>	<p>Noted, this statement was also mentioned by respondents who did agree.</p>
<p>One Energy Supplier disagrees: an obligation on a web-based company to provide other communication channels could dilute the quality of service they are able to provide due to resourcing constraints. Other channels should be available to customers from other sources to ensure accessibility to the switching process does not disadvantage customers without access to the internet. Customers can also use the phone to check or confirm offers from different companies.</p>	<p>Noted, the obligatory character of this recommendation was also questioned by respondents who agreed.</p>
<p>One Energy Supplier Organisation disagrees: the amount of persons which are not able to use the internet is decreasing steadily. A hotline or other communication channels are not seen as suitable. Additionally it is difficult as supplier to control the correctness of the data used by alternative communication channels. Additionally the additional communication channel has to function similar to the internet to assure the timeliness of the prices.</p>	<p>Disagree. Penetration of internet is indeed rising. However there will always be customers who cannot have access to internet. The control of correctness could be at risk, however, the recommendation on correctness also applies to offline PCTs.</p>
<p>Recommendation 13: Online price comparison tools should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.</p>	

Respondents' feedback	CEER's position
All 36 respondents agreed that online price comparison tools should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.	Noted
One confidential respondent states that NRAs should be prepared to implement price comparison tools which are designed to meet special needs if the market fails to address these in a satisfactory manner. Also, NRAs may promote special access needs by granting quality certificates to private comparison tools run by private entities which are prepared to meet them conveniently.	Noted
One confidential respondent adds that in addition a "Green Button" type approach eliminates a further barrier, namely obtaining the consumer's own actual consumption information.	Noted
Three respondents, one confidential respondent and two Energy Supplier Organisations state that in a competitive market it is in the interest of the provider of the tool to ensure that its tool can also be accessible to those with disabilities.	Disagree. In a perfect, competitive market for PCTs the needs of these groups will be met. However, in markets where this level of competition has not been reached, this recommendation remains.
One Consumer Organisation adds that for a PCT, the implementation in line with WCAG is especially difficult to achieve (because of multiple entry datasheet and the visualization of data results).	Disagree. Best practices in the market may prove that it is possible to work in line with WCAG.
Two Energy Suppliers agree that accessibility would certainly improve the usefulness of the tool. However, accessibility is in our opinion not a prerequisite.	Disagree. In a perfect, competitive market for PCTs usefulness is something PCTs can use to distinguish themselves. However, in markets where this level of competition has not been reached, this recommendation remains.
Recommendation 14: The use of social media and cooperation with other (public) agencies involved in customer information and/or protection should help make the NRA-run price comparison tool widely known.	
28 out of 36 respondents agreed that the use of social media and cooperation with other (public) agencies involved in customer information and/or protection should help make the NRA-run price comparison tool widely known. Consumer bodies agreed with this recommendation and stress that information about PCTs should be as widely spread as possible, preferably in cooperation with public organisations and agencies.	Noted

Respondents' feedback	CEER's position
Respondents that disagreed are mainly from the industry and found that using social media should not be a prerequisite, and should be left to the discretion of the PCT.	
Two Consumer Organisations add: raising consumer awareness and disseminating information about price comparison tools should be done through all available channels to consumers. One Consumer Body adds that cooperation with public organizations and agencies is highly recommended, and consumers should be given information about available price comparison websites in their market through the single point of contact with the energy supplier.	Noted
One Energy Supplier Organisation states that in general, the NRAs should not necessarily run a price comparison tool if other neutral and qualitative comparison tools are available.	Agree – CEER does not intend to make it obligatory for a NRA to run a PCT, especially if there are good PCT's available in the market.
Several respondents note that not all consumers actively use social media, and that this recommendation should not be mandatory.	Noted
One Energy Supplier commented that the advertisement of price comparison tools by NRAs, in cooperation with other public agencies or customer associations, may be a valuable way to promote this instrument to a wide public, thus improving its accessibility.	Noted
One Energy Supplier Organisation states that it is important to guarantee that the authorities are granted funds for this and that the agency's price comparison tool is known by the customers.	Noted – however CEER does not intend to make recommendation on how member states should allocate funds to achieve certain goals
One Energy Supplier commented that it is necessary to promote the benefits of changing the supplier and the use of a tool to compare prices. Due to the status of the NRA, comparison tool launched by the NRA should be especially promoted in the social media as a tool guarantee independence and transparency.	Noted, however if private PCT's are available and meet all recommendations, CEER does not prefer the NRA PCT above a privately run PCT.
Six respondents, one confidential respondent, three Energy Suppliers and two Energy Supplier Organisations disagree: this is an option that NRAs/ agencies can choose. The most effective means of advertising the comparison tool may be different in different member states and social media is not necessarily widely used.	Agree. Recommendations should be seen in the light of national circumstances.
One Energy Supplier disagrees: it is not a task for a NRA to be active in social media. The social media is a matter of the customers to inform each other.	Disagree. Also NRA's can have a role in social media

Respondents' feedback	CEER's position
<p>One Price Comparison Tool disagrees: In our view it is not the NRA's duty to run a price comparison tool. Its duty is to provide a level playing field for all energy players in the market. Separation of regulation and service provision.</p>	<p>Disagree. Especially in markets where PCTs are not available an NRA could provide one.</p>
<p>VIII Background Information</p>	
<p>Recommendation 15: Background information on market functioning and market issues such as price developments should be provided if the customer wants this information.</p>	
<p>27 out of 36 respondents agreed with the provision of background information on market functioning and market issues such as price developments by the PCT.</p> <p>All consumer bodies agreed with the recommendation, but note that information on market development should not be included as a main feature of the site as it may cause confusion with the consumer.</p> <p>Some members of the industry disagree and state that this is not a task of a PCT, but this should be done by a supplier, NRA or single point of contact (EC Checklist). Others were concerned whether a PCT could provide impartial information and state that a link to the information would suffice.</p>	<p>Noted</p>
<p>One Consumer Organisation adds: Information on energy market developments should be present on the website of the price comparison tool. Nevertheless, it should not be included as a main feature, and be displayed on a separate section of the website, in order not to confuse consumers. Further, it is extremely useful for consumers to be able to switch energy suppliers directly via the price comparison tool for all types of available offers. It is often the case that energy suppliers do not allow price comparison websites to inform or sell their cheapest products, restricting them to their own private website, thus undermining the whole price comparison market. These practices need to be avoided with regulatory oversight or with enforceable accreditation schemes that will ensure that the entire range of offers available to consumers is accessible through every price comparison website.</p>	<p>Noted</p>
<p>One Energy Supplier adds that the project should have the ambition of including new 'interestees' i.e. encouraging customers to have interest.</p>	<p>Noted</p>
<p>Four respondents, one confidential respondent, two Energy Suppliers and one Price Comparison Tool state that such information should be provided on NRAs-run website, whereas privately-run</p>	<p>Noted</p>

Respondents' feedback	CEER's position
websites should include a link to the relevant information available on NRA's websites.	
One TSO adds: it is specified that only ex-post information is given on the price development on a price comparison tool. It should be left for market actors to determine future market prices and to give recommendations to customers to sign new agreements.	Noted, however, PCT's are also seen as market actors and can therefore play an important role in providing information
One Energy Supplier adds that providing this kind of information shouldn't be free of charge.	Disagree. If this kind of information is provided this should be done free of charge.
One Energy Supplier commented that impartial information on such matters should be available to the customer on request. However, defamatory comments or discriminatory views should be guarded against.	Noted
One Energy Supplier Organisation added that in any case the supplier should not be forced to publish information which are part of the company's strategy (e.g. pricing).	Noted
One Consumer Organisation commented that privately-owned PCTs are often business companies. At least a business company will give any information as a kind of advertising to support the own business. Therefore it would be helpful to give information about ADR-System, the single point of contact and consumer organizations as well to receive neutral advice.	Noted
One Consumer Organisation advises caution where speculation by providers of price comparison tools about future price developments is being used to direct consumers towards certain products, particularly where it may be commercially beneficial for a provider.	Noted
One Energy Supplier disagrees, because it would be almost impossible to agree on an objective commentary on the market which would in any case refer to historic events and not future prices. There are already a large number of articles accessible to consumers on these issues.	Disagree. As PCT's have a very important role in market they should also provide information on market functioning.
One Energy Supplier disagrees, because the goal of comparison tools is to compare offers and prices, not to give information on market functioning or market issues. This is the job of NRAs or of Ombudsmen. The price comparison internet site can of course propose links towards the relevant sites providing such information.	Disagree. However, a link to the relevant sides could be an option.
Five respondents disagree, one confidential respondent, two Energy Supplier Organisations and two Energy Suppliers disagree: As such information, like the Commission's Energy Consumer	Disagree. CEER does not recommend that PCT's fulfil the role of a supplier in this regard (e.g.

Respondents' feedback	CEER's position
<p>Checklist, is not the responsibility of the provider of a price comparison tool; it should be made available via other websites (e.g. the NRA, consumer bodies). Of course the price comparison websites could refer to such sites. For example, it could be considered to inform customers that early termination of contract or switching without terminating the contract with the old supplier could result in extra costs.</p>	<p>providing a checklist). However PCT's should play an important role in providing relevant information on the functioning of the market. A link through could be an option though.</p>
<p>One Energy Distribution Organisation disagrees, because: it will not provide any added value to the customer. Most of the customers would not want that or understand it anyways. They want to know who's the cheapest and not how and if the market functions correctly</p>	<p>Disagree. If a customer wishes to have such information he should be able to receive it from or via the PCT.</p>
<p>Two Energy Suppliers disagree and add that such information is often available via other websites (e.g. the NRA main site, consumer organisations) it should be sufficient for the price comparison websites to refer to such sites.</p>	<p>Agree. Providing a clear link could be an option.</p>
<p>Recommendation 16: A good practice is to offer additional services on request, such as a "reminder" if the customer is bound by a contract when doing the price comparison, if the customer chooses to receive this.</p>	
<p>29 out of 36 respondents agreed with a PCT offering additional services on request, such as a "reminder" if the customer is bound by a contract when doing the price comparison. The consumer bodies agreed, but state that this information should not lead to confusion with the consumer. Some respondents from the industry disagree and did not think this service fitted into the role of a PCT, it should be a supplier's task to provide this service. Also concerns were raised about the possible dangers with regards to privacy and unlawful advertisements. This recommendation was regarded as optional rather than obligatory by many.</p>	<p>Noted</p>
<p>One Price Comparison Tool adds that it must be taken into account, that sometimes such services cannot be provided when the necessary underlying data cannot be retrieved from available open sources. Therefore, we strongly encourage the NRA to put pressure on the suppliers to provide a facility to make such on-line contract-status checks and in this way enable the comparison sites to provide the result real-time to the visitor.</p>	<p>Noted</p>
<p>One Consumer Organisation commented that any communication on additional services should not cause any further unwanted confusion to consumers.</p>	<p>Noted</p>
<p>One Energy Supplier agrees with the idea of such services, under the condition that the customer does this on a voluntary basis and that the service offered is compatible with data</p>	<p>Noted and agree. Security and privacy is of utmost</p>

Respondents' feedback	CEER's position
privacy rules	concern.
One Consumer Organisation adds that an additional service which can be very useful for the consumer and serve market development is the inclusion of a "switching mechanism", which allows the consumer to carry through a change of supplier or product straight from the homepage.	Noted. It could be part of a best practice to provide the option to switch supplier from a PCT's website.
One confidential respondent states that it is especially important to offer all reminders involved if the additional services suppose an important cost saving when they are accepted by user.	Noted
One Consumer Organisation adds that it is essential that consumers are not forced to give their phone number, e-mail or post mail, in order to use a PCT. Running a comparison must not induce commercial solicitations.	Noted
One confidential respondent commented that if this statement is referring to highlighting exit penalties, then this would ensure the customer is in receipt of the full costs associated with switching suppliers and we would agree with the statement. However, if this refers to a comparison site contacting a customer once the tariff they have previously switched to is coming to an end, then we strongly disagrees with this statement and believe it is the responsibility of the supplier to engage with the customer in the first instance and review the best options.	Disagree. The recommendation intends for the PCT to give this information, but only if the customer has given its consent to do so.
One Academic respondent adds that the energy providers may wish to discourage this aspect of provision.	Noted
One Consumer Organisation would want to ensure that any parallel communication from providers of price comparison tools does not cause any undue confusion to consumers.	Noted
One Energy Supplier disagrees, because any additional service going beyond what is necessary to price comparison should be left to the discretion of the website owner and not be prescribed as a prerequisite for a good price comparison tool. Therefore, the provision of this additional services should be investigated when specific needs appear from the customers using this instrument.	Agree. However, CEER considers this recommendation a good practice rather than an obligation. If a customer wishes to receive such information and has given his consent, he should be able to receive this information
Two respondents, one Energy Supplier Organisation and one Energy Distribution Organisation disagree because this information is already provided by the current electricity supplier, on the customers' direct request, when the customers switch suppliers. It would be impossible for the price comparison companies to have control of all contracts. Also they cannot support the	Noted, Privacy and security of personal data is of utmost concern. However if this is guaranteed a PCT should be able to give this information to a

Respondents' feedback	CEER's position
<p>recommendation to share these data with third parties such as providers of comparison, as we cannot guarantee the protection of these data.</p>	<p>customer if he has given his consent.</p>
<p>One Energy Supplier disagrees because reminders may dilute or confuse the message being imparted by suppliers which could impact on the customers' decision making process. On the other hand, suppliers are obligated to notify customers if their fixed term contract is coming to an end and informing them of the options available to them at that time.</p>	<p>Noted. Customers should not get confused by conflicting messages. PCT's and suppliers should harmonise the spread of information on this issue.</p>
<p>One Energy Supplier disagrees, because the comparison tool should be anonymous and not be a database of customers and their contracts, especially it can be used by unfair competition. The role of a reminder about the validity of the customer's contract should meet the current supplier.</p>	<p>Noted, personal information can only be used for the purpose it was intended for, not to induce unfair practices.</p>
<p>One Energy Supplier Organisation disagrees, because the installation of the proposed "reminder" is not practicable and difficult to implement. If price comparison tools would offer such a service the payment of commissions for new customers (which is standard in Germany) to the tool by the supplier can become unattractive. VKU sees a "reminder" critical as prices can change during the time and an offer which was attractive earlier is now to the disadvantage of the user</p>	<p>Noted</p>
<p>One Consumer Organisation disagrees, because the idea might support unlawful advertisement by direct marketing. The "transparent customer" might be a solution and causes serious problems. Incalculable inconvenience and a worse trade in data might be a result. Even if the "reminder" seems to be optional in the statement it is not altogether impossible that private PCTs will ask for a prior consent before using the PCT. Consumers not agreeing with the rules of PCTs might lose a fast and easy way to compare different offers. As mentioned in answer No 4 it is the task of the consumer to set and select all necessary criteria to get any result. The duration of his old contract might be one of these criteria in case the consumer does not only want to inform himself on the website but switch the supplier.</p>	<p>Noted</p>

Table 5 - Evaluation of responses

4.1 Summary of consumer organisation's responses to the consultation

All responses to the consultation have been considered. As the CEER we are particularly interested in the views of consumer organisations and have summarised them below. Six consumer organisations responded to the consultation: BEUC, the Danish Consumer Council, Médiateur National de l'énergie (France), Verbaucherzentale Bundesverband (Germany) and Consumer Focus and Which? from the United Kingdom.

Four consumer organisations agreed with all our recommendations except recommendation 2B, that self-regulation may be appropriate. In particular, one organisation pointed out that:

- regulatory oversight is key; whether in terms of NRAs running their own PCT or overseeing privately run ones. NRAs can ensure that standards are met and enforced whereas self-regulation can result in conflicts of interest.

- information displayed should be easily understandable for the consumer and special offers should be fully explained, for example information on funding and governance can be complex and such information should be clear and easy for the consumer to understand and access. All available appropriate products and services should be displayed at the very beginning and then the consumer should be offered the ability to filter results. Filtering can account for customers' particular preferences and reduce the number of options, however consumers should be given the choice regarding the amount and type of information they want to enter;

- PCTs should use a consumer's information exclusively for the specific query and comply with Data Protection legislation;

- it could be helpful to create a common format for tariffs, common tariff vocabulary and common tariff names;

- energy contracts cannot exclusively be evaluated on the price of energy, other conditions are equally important to consumers;

- the owner of the PCT should be responsible for the correctness of its offers and changes in prices should be updated within 24 hours. Consumer protection can be supported by informing consumers about the liability of the tool and the means to redress in a case of poor service. Raising consumer awareness and disseminating information about price comparison tools should be done through all available channels to consumers. Similarly, additional channels of information – not just online – should be completely free of charge.

- cooperation with public organizations and agencies is highly recommended, and consumers should be given information about available price comparison websites in their market through the single point of contact with the energy supplier.

One consumer organisation agreed with all of the recommendations. They suggested that the carbon content of the different tariffs should be displayed to help consumers make informed choices. In relation to recommendation 8 they stated that important contractual conditions should also be provided on PCTs. They suggested that one helpful additional service is to allow consumers to switch via the PCT homepage rather than having to visit the supplier's site.

On consumer organisation disagreed with recommendation 16 that a reminder can be provided to the consumer if the tariff is bound by a contract. They suggest that such contact may be unwarranted and could be seen as unlawful advertisement or direct sales. They suggested that permission to contact the consumer must be sought and given before such a service can be provided. They partly agreed with recommendation 4 to include all products and prices, citing that there are many doubtful and confusing tariffs being offered which could mislead consumers. Clear selection criteria of the features of tariffs can help consumers to make appropriate choices.