



CEER

**Council of European
Energy Regulators**

Fostering energy markets, empowering **consumers**.

Guidelines of Good Practice on Future- Proof Comparison Tools for the Energy Sector

**Customer Empowerment Work Stream
of the
Customers and Retail Markets Working Group**

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INFORMATION PAGE

Abstract

In July 2012, the first version of the CEER Guidelines of Good Practice (GGP) on Price Comparison Tools (CTs) was published. It presented 14 recommendations for energy price CTs which covered the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correctness and accuracy, user-friendliness, accessibility and customer empowerment.

In 2017, these recommendations were updated for the first time. As nearly five years have elapsed since this first update, and there have been several amendments to the existing legislation, CEER has decided to check whether and how the existing recommendations can be enhanced.

This document C22-CEM-147-03 presents the second updated and expanded guidelines. Although the 2012 and 2017 GGP on CTs remain essentially valid, the present revision introduces some novel aspects that derive from the experience of the past five years, technological and market evolution and a stakeholder consultation. These updated GGP should be considered as a list of best market practices. They are not intended to provide a set of minimum requirements for ensuring the reliability of energy price CTs.

Target audience

National regulatory authorities (NRAs), European Commission, Member States (MS), gas/electricity consumers, consumer representative groups, academics and other interested parties.

Keywords

Price comparison tools; comparison tools; consumer empowerment and protection; Clean Energy Package; retail energy markets; supplier switching; energy offers; vulnerable consumers.

If you have any queries relating to this paper, please contact:

CEER Secretariat

Tel. +32 (0)2 788 73 30

Email: brussels@ceer.eu

Related documents

CEER documents

- [CEER Public Consultation on Guidelines of Good Practice on Price Comparison Tools](#), December 2021, Ref. C21-CEM-142-06.
- [CEER-BEUC 2030 Vision for Energy Consumers: LET'S ASPIRE!](#), October 2020.
- [CEER Guidelines of Good Practice on Comparison Tools in the New Energy Market Design – Updated Recommendations](#), December 2017, Ref. C17-CEM-107-04.
- [CEER Public Consultation Evaluation of Responses on Guidelines of Good Practice on Comparison Tools in the New Energy Market Design](#), December 2017, Ref. C17-CEM-105-03.
- [CEER White Paper series \(paper # III\) on the European Commission's Clean Energy Proposals on Consumer Empowerment](#), May 2017.
- [CEER 2017 Handbook for National Energy Regulators on How to Assess Retail Market Functioning](#), January 2017, Ref. C16-SC-52-03.
- [CEER Public Consultation Paper on Guidelines of Good Practice on Comparison Tools in the new Energy Market Design](#), November 2016, Ref. C16-CEM-95-03
- [CEER Report on Commercial Barriers to Supplier Switching in EU Retail Energy Markets](#), July 2016, Ref. C15-CEM-80-04.
- [CEER Benchmarking Report on Removing Barriers to Entry for Energy Suppliers in EU Retail Energy Markets](#), April 2016, Ref. C15-RMF-70-03.
- [“CEER Position Paper on Well-Functioning Retail Energy Markets”](#), October 2015, Ref. C15-SC-36-03.
- [CEER Advice on Customer Data Management for Better Retail Market Functioning](#), March 2015, Ref. C14-RMF-68-03.
- [BEUC – CEER Joint Statement on A 2020 Vision for Europe's Energy Customers](#), November 2012 and updated June 2014.
- [CEER Guidelines of Good Practice on Price Comparison Tools](#), July 2012, Ref. C12-CEM-54-03.
- [CEER Guidelines of Good Practice on Electricity and Gas Retail Market Design, with a Focus on Switching and Billing](#), January 2012, Ref. C11-RMF-39-03.

External documents

- [“Energy Regulation: A Bridge to 2025” Conclusions Paper, Agency for the Cooperation of Energy Regulators \(ACER\) and Council of European Energy Regulators](#), September 2014

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EXECUTIVE SUMMARY

Easy access to neutral and objective information on available offers is one of the key elements that can empower electricity and natural gas customers to play an active role in retail markets. This enables them to take advantageous decisions about choosing their new contract, or about whether or not to switch from their current contract or provider.

Comparison tools (CTs) can empower customers by providing smart and easy access to the kind of information that will facilitate consumer decision-making. It is, however, crucial to ensure that CTs are actually functioning well, i.e. that they provide genuine, reliable, useful and usable information on both price and other features that are relevant for customers to be able to make prudent choices. It is equally important that customers feel that they can trust CTs, and that they will be able to take advantage of the information and services that these tools provide.

In July 2012, the CEER Guidelines of Good Practice (GGP) on Price Comparison Tools¹ (the 2012 GGP) presented 14 recommendations for energy CTs which cover the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correctness and accuracy, user-friendliness, accessibility and customer empowerment. These GGP were first updated in 2017, when new guidelines were introduced to account for evolving markets.²

Due to the continuous development of market design and technology, CEER undertakes an ongoing review process. This has resulted in the present update of the GGP on CTs with 20 updated and new recommendations. During the preparation of the document, CEER gained insights from the Partnership for the Enforcement of European Rights (PEER) cross-sectoral and cross-authority Regulatory Roundtable on Challenges for Comparison Tools in Customer Journeys, organised by CEER between 7 and 9 June 2021³. CEER also launched a public consultation giving stakeholders the opportunity to comment on the draft proposals.⁴

The present updates take into account the adoption and entry into force of the recast Directive 2019/944 on common rules for the internal market for electricity (recast Electricity Directive)⁵, which includes specific provisions regarding CTs, as well as the continuing technological and market evolution of the energy sector.

Whilst the emergence of innovative business models and digital information tools can help to empower consumers to engage with the energy market, it must also be ensured that they provide an accurate, reliable and accessible service. These developments increase the necessity of providing guidance for CT operators to enable consumers to actively participate in the energy market by providing useful information. However, CTs should also protect the consumer by supporting their choice with trustworthy, independent and transparent information on the comparison of energy supply contracts.

¹ [CEER Guidelines of Good Practice on Price Comparison Tools](#), July 2012, Ref. C12-CEM-54-03.

² [CEER Guidelines of Good Practice on Comparison Tools in the New Energy Market Design – Updated Recommendations](#) (2017 GGP), December 2017, Ref. C17-CEM-107-04.

³ <https://www.ceer.eu/digital-comparison-tools>

⁴ [CEER Public Consultation on Guidelines of Good Practice on Price Comparison Tools](#), December 2021, Ref. C21-CEM-142-06.

⁵ [Directive \(EU\) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU](#).

The updated recommendations

The recommendations represent an evolving process. Some of CEER's recommendations became legislative requirements during the revisions of European Directives in the last couple of years. In those cases, the relevant articles are indicated, and referenced to the recast Electricity Directive. The updated recommendations are presented in the blue filled section of the table and in "**bold**".

During the update, some recommendations were only slightly adapted (denoted by "Minor Update"). For more substantive updates or new recommendations, dedicated chapters provide more details about the background for changing the recommendation.

Please note that these CEER Guidelines of Good Practice on Future-Proof Comparison Tools for the Energy Sector (2022 GGP) should provide guidance for both electricity and gas market CTs. However, due to differences in technology and markets, as well as legal developments, there may be some differences in the relevance of specific recommendations. In those cases, CEER has provided additional notes in the "Relevant provision" column.

Updated CEER recommendations		Relevant provision in recast Electricity Directive
I	Independence of the tool	
1	<p>Any CT must be independent of energy supply companies, presenting a non-discriminatory overview of the market to the user.</p> <p>The provider of a CT should show all information in a clear, simple and consistent way.</p>	<p>Article 14 (1)(a): The tools (...) shall be independent from market participants and ensure that electricity undertakings are given equal treatment in search results;</p>
2	<p>Ensuring the reliability of CTs is crucial to protecting and empowering customers. The best way to achieve this goal can be efficiently defined at national level, taking into account the maturity and competitiveness of both the comparison market and the energy market, and could be implemented with the active role of NRAs or other public bodies.</p> <p>NRAs or another public body may also decide to establish their own reliable CT service where no private service exists or to complement commercial CTs, and may consider ways to promote the service to customers.</p>	<p>Article 14 (1): Customers shall be informed of the availability of such tools in or together with their bills or by other means.</p> <p>Article 14 (2): The tools (...) may be operated by any entity, including private companies and public authorities or bodies.</p> <p>Article 14 (3): Member States shall appoint a competent authority to be responsible for issuing trust marks for comparison tools that meet the requirements.</p>

<p>3 All New</p>	<p>When offering new services like automated switching, CTs must ensure that such business models are in line with existing consumer rights. Moreover, these new services imply a higher need for transparency, as the service provider has more information than the consumer, and the relevant contractual relationships with suppliers need to be clear for consumers. This is increasingly relevant in situations where the CT signs contracts on behalf of the consumer, which should also fit with the consumer's preferences. The consumer should be informed in advance before automatic switching takes place and must agree to the switch.</p>	
<p>II Transparency</p>		
<p>4 Minor Update</p>	<p>CTs should disclose the way they operate, their funding and their owners/shareholders to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers before the results of the comparison simulation are shown.</p> <p>Advertisement and/or sponsored products should be clearly identified and separated from the comparison results.</p> <p>Information about the availability of CTs should be found on consumer bills or provided by other means of communication, to give consumers the ability to easily find and access the CTs.</p>	<p>Article 14 (1)(b): The tools (...) shall clearly disclose their owners and the natural or legal person operating and controlling the tools, as well as information on how the tools are financed;</p> <p>Article 14 (1): Customers shall be informed of the availability of such tools in or together with their bills or by other means.</p> <p><i>Annex 5 presents a case study on availability.</i></p>
<p>III Exhaustiveness</p>		
<p>5 Minor Update</p>	<p>CT coverage of the market should be as complete as practicable. If the information presented does not offer a complete overview of the market, the CT should clearly state this before showing the results of the comparison simulation as well as on the comparison results screen. This should be done by notifying users that there are other suppliers and offers on the market not covered by the CT – if feasible, it should therefore name the suppliers that are covered, and, also name the missing supplier(s).</p>	<p>Article 14 (1): Member States shall ensure that at least one tool covers the entire market. Where multiple tools cover the market, those tools shall include, as complete as practicable, a range of electricity offers covering a significant part of the market and, where those tools do not completely cover the market, a clear statement to that effect, before displaying results.</p>

	<p>All prices and products covered by the CT and available to the customer on the basis of general selection criteria (e.g. the area where the supply is located, or a given customer segment) should be shown as a first step in the comparison results screen. CTs should also feature search and ranking factors that make it possible for consumers to find a product in line with their preferences. Filtering tools should allow consumers to choose among different types of offers, different payment methods, or to filter out bundled offers, among others.</p>	
IV	Clarity and comprehensibility	
6 Minor Update	<p>Final prices should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total price on a yearly basis or on the basis of the unit kWh-price. Any discounts should be clearly described, specifying when those discounts end and what the price would be after discount. Discounts which are subject to conditions (e.g. termination fees) or restrictions, should be clearly separated from the final price estimation and be prominently communicated.</p> <p>CTs should clearly indicate that prices shown as a total price are an estimation, as they are based on historic or estimated consumption and on price information available at present. The same warning should be indicated where a CT offers an estimation of potential savings that might be obtained by switching to listed offers.</p> <p>Access to additional information on price details (e.g. unit prices, cost components, ...) and on the methodology used for final price or potential savings estimation, should also be made available to customers.</p>	
7 Minor Update	<p>Fundamental characteristics of all products should be presented on the first page of the results screen, adopting appropriate graphic or hypertext solutions to facilitate visibility and comprehension.</p>	

	<p>This information should refer both to price (for example, fixed or floating price; time of use or flat price...) and to other fundamental features (for example, main contractual terms, duration of the contract, termination conditions or payment options, bundled services or products, origin of energy production...).</p> <p>Explanations of the different characteristics should be available as second-level information to help the customer understand their options.</p>	
8 Updated	<p>CTs should offer additional information on the listed offers, in case the consumer wishes to use such information to help them choose the best offer that will meet their needs. Where additional information based on subjective parameters is offered (for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.), the CT should clearly disclose the nature of the information, the parameter used and the origin of the underlying data, to favour customer awareness. Pre-settings of the search tool must be clear for everyone and adjustable by the consumer. When offering any results in a "Position 0"⁶, the selection criteria must be clear for the user. To ensure independence stated in recommendation 1 and transparency stated in recommendation 4, non-objective rankings of commercial agreements (such as Position 0) should be clearly distinguishable from search results.</p>	
V	Correctness and Accuracy	
9 Original	<p>Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.</p> <p>CTs should rectify without delay any incorrect information on published offers. To achieve this, they should provide a quick and effective procedure allowing any interested party to report incorrect information.</p>	<p>Article 14 (1)(e) and (g): The tools (...) shall provide accurate and up-to-date information and state the time of the last update; they shall provide an effective procedure for reporting incorrect information on published offers;</p>
VI	User-friendliness	

⁶ Promoting an offer before the first placed ranking.

<p>10 Minor Update</p>	<p>Customers should be allowed to introduce their consumption data in a simple and friendly manner. In addition, CTs should offer help through default consumption patterns or, preferably, using a tool that calculates the approximate consumption, based on information available to, and that can be easily provided, by the user. CTs should allow consumers to compare new offers with their current offer. To this end, CTs should also be able to store information on offers that are not available on the market anymore.</p>	<p>Article 14 (1)(d): The tools (...) shall use plain and unambiguous language;</p> <p>Annex 5 presents a case study on user-friendliness.</p>
<p>VII</p>	<p>Accessibility</p>	
<p>11 Updated</p>	<p>To ensure an inclusive service, at least one additional communication channel (other than the internet) for accessing a comparison should be provided, free of charge or at minimal cost at least by the CT covering the entire market. This channel should take into account all digitally excluded persons who are excluded by choice or by default. For example, comparison information could be made available via local authorities, citizen information offices, consumer associations or other bodies. Also, customers with disabilities (visual and/or hearing impairment) must not be left behind and should have access to a CT. In this regard, CTs could provide integrated accessibility options such as sound amplifiers, magnification tools and features to increase the font sizes, as well as colour correction for colour blindness, and voice accessibility for blind and visually impaired consumers.</p> <p>Whenever possible, CTs should adapt to the continuing development of technological devices (smart phones, tablets, new gadgets...) to be accessible for customers in the widest variety of forms with the same level of accuracy.</p>	<p>Article 14(1)(f): The tools (...) shall be accessible to persons with disabilities, by being perceivable, operable, understandable and robust;</p> <p>Article 14(1)(par. 2): Member States shall ensure that at least one tool covers the entire market.</p> <p>Annex 3 presents a case study on accessibility.</p>
<p>12 Original</p>	<p>Online CTs should be implemented in line with the Web Content Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.</p>	<p>Article 14 (1)(f): The tools (...) shall be accessible to persons with disabilities, by being perceivable, operable, understandable and robust;</p>
<p>VIII</p>	<p>Customer empowerment</p>	

<p>13 Minor Update</p>	<p>CTs should offer navigation tools such as filtering or alternative ranking functionalities, based on fundamental features of listed products, helping customers to select the best offers for them. The default ranking should be based on price criteria.</p> <p>CTs should be transparent about the criteria on which navigation tools are based. Where navigation tools are based on subjective parameters (for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.), they should be listed as a suggestion to the customer, but not used in the primary CT ranking. As stated in recommendation 8, CTs should clearly disclose the nature of the parameter and the origin of the underlying data, in order to favour customer awareness.</p>	
<p>14 Original</p>	<p>CT providers should consider how best to empower customers to use their service and make appropriate choices for their needs.</p> <p>Background information on market functioning, on market issues such as price developments, and links to useful independent sources of information may be provided to help customers.</p>	
<p>15 Updated</p>	<p>CT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across CTs can help to enable understanding. When offering information on the source of energy, CTs should enable the consumer to assess this information in an easy and trustworthy way. For this reason, CTs should focus on reliable green claims pre-approved by NRAs or by other designated competent authorities, which should be featured in CTs.</p>	<p>Article 14 (1)(d): The tools (...) shall use plain and unambiguous language;</p>

<p>16</p> <p>All New</p>	<p>It must be transparent for consumers which personal data are used by the CT to provide its services and which data are shared with third party companies. The access to data should be limited to necessary data that will ensure the smooth operation of the CT. Consumers must have the final choice of sharing their data with the CT and/or third parties. The consumer must actively agree to the use and sharing of their personal data. Data protection rules must be in line with the General Data Protection Regulation⁷ (GDPR) and privacy has to be ensured.</p>	<p><i>Article 14 (1)(h): The tools (...) shall perform comparisons, while limiting the personal data requested to that strictly necessary for the comparison.</i></p>
<p>IX</p>	<p>Dynamic market developments</p>	
<p>17</p> <p>Updated</p>	<p>CTs should be open to innovation to adapt to and reflect the evolution of the energy market: implementation of smart metering, electric vehicles, new pricing models and new business models (demand response, prosumer, aggregators...); thereby helping consumers to become active players in the energy market. If the CT has the ability to compare new business models, such as aggregation or bundled offers, that are part of the energy retail markets, it should offer the same quality of comparison as for supply services. CTs must easily provide a means of distinguishing between energy and non-energy elements (and explain what these mean in the context of the offer).</p>	<p>Note: The relevance of some new services differs in electricity and gas.</p>
<p>18</p> <p>Updated</p>	<p>CTs should adapt to the development and deployment of smart meters, being able to process data from them and provide customers with more accurate comparisons and analysis depending on their consumption habits and, in general, on the circumstances that may affect the results of the comparison. The use of smart meter data should be limited to the individual comparison, and data protected in line with the existing legal requirements which must be ensured by the CT.</p>	<p>Note: Currently smart meters are more relevant in electricity.</p>

⁷ (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

<p>19 All New</p>	<p>As dynamic electricity price offers must be included in CTs, the level of quality of the comparison should be at least the same as for conventional offers. Moreover, there needs to be more detailed information about dynamic electricity price contracts, given that the consumer may not have enough experience with the pros and cons of these offers. Therefore, the CT should feature clear and factual information about the potentially high price volatility. CTs could complement suppliers' information about these types of contracts, as it is difficult to compare between dynamic offers and other standard offers. In this regard, before showing the results, CTs should ask whether the consumer would like to compare a dynamic price offer or a standard offer.</p>	<p>Article 14 (1): Member States shall ensure that at least household customers, and microenterprises with an expected yearly consumption of below 100 000 kWh, have access, free of charge, to at least one tool comparing the offers of suppliers, including offers for dynamic electricity price contracts.</p> <p>Article 11 (2): Member States shall ensure that final customers are fully informed by the suppliers of the opportunities, costs and risks of such dynamic electricity price contracts, and shall ensure that suppliers are required to provide information to the final customers accordingly, including with regard to the need to have an adequate electricity meter installed.</p> <p>Note: Currently dynamic offers are more relevant in electricity.</p>
<p>20 All New</p>	<p>In addition to providing a fair and reliable comparison, CTs should inform consumers about any additional services, such as energy efficiency equipment support, social care or technical assistance, that are promoted by service providers, to the extent possible. When proposed, such extra services, as well as their specific conditions, should be clearly explained in the contract terms.</p> <p>Also, CTs should provide the possibility for the consumer to compare offers with or without these types of services.</p>	<p>Annex 4 presents a case study on additional information.</p>

Table 1 - Updated CEER recommendations and relevant provision in the recast Electricity Directive

1 Introduction

Since 2010, CEER has been actively supporting market stakeholders, in general by providing guidance on well-functioning retail markets, and more specifically, by publishing the Guidelines of Good Practice (GGP) on Price Comparison Tools (CTs). The GGP were first published in 2012⁸ (the 2012 GGP) and later updated in 2017⁹ (the 2017 GGP). Due to the continuous development of market design and technology, CEER undertakes an ongoing review process, which has resulted in this update of the GGP on Price CTs.

Insights gained from the Partnership for the Enforcement of European Rights (PEER) cross-sectoral and cross-authority Regulatory Roundtable on Digital Comparison Tools in Customer Journeys¹⁰ were used to review the 2017 GGP as regards both publicly run (e.g. by energy regulators) and privately run CTs. The challenge of incorporating into CTs the risks and benefits of dynamic offers, allowing consumers to make informed choices, is also addressed.

With the revision of the legal framework for gas markets currently underway, CEER is revisiting and continuing its initial work on GGP for CTs for the energy sector. This is in light of the increased use of online CTs and the emergence of dynamic contracts in various marketplaces as a result of digitalisation (smart meters), technology developments (storage, electric vehicles) and decentralisation (production, demand response...).

1.1. Context and previous work

The 2012 GGP were based on a set of 14 recommendations on how CTs can function effectively to the benefit of energy customers. These GGP were updated and amended in 2017 by adding new guidelines. Since this update, new developments have changed the dynamics of retail energy markets and created new issues relevant to CTs. This becomes even more important as the Clean Energy for All Europeans Package (CEP)¹¹, the Consumer Packages¹², Data Protection Rules¹³ and the Hydrogen and Gas Decarbonisation Package¹⁴ set up a new framework for the retail energy market.

The ACER/CEER Annual Report on the Results of Monitoring the Internal Electricity and Natural Gas Markets in 2020¹⁵ (ACER/CEER MMR) reports on some trends regarding the use of CTs and the implementation of the recast Electricity Directive across Member States (MS). The ACER/CEER MMR's findings show that CTs for electricity exist in 25 MS and in 19 for gas. Some of these MS have more than 10 CTs, while others have only one. The CTs are operated by national regulatory authorities (NRAs), other public bodies or commercial companies (sometimes certified by public bodies). However, in some MS, no independent body currently operates a CT for households and microenterprises.

⁸ [CEER Guidelines of Good Practice on Price Comparison Tools](#), July 2012, Ref. C12-CEM-54-03.

⁹ [CEER Guidelines of Good Practice on Comparison Tools in the New Energy Market Design – Updated Recommendations](#), December 2017, Ref. C17-CEM-107-04.

¹⁰ <https://www.ceer.eu/digital-comparison-tools>

¹¹ “Clean Energy for All Europeans Package”, European Commission, 2019. Retrieved from: https://energy.ec.europa.eu/topics/energy-strategy/clean-energy-all-europeans-package_en.

¹² “Energy Supply: Policy Information”, European Commission. Retrieved from: https://ec.europa.eu/info/live-work-travel-eu/consumers/energy/energy-supply-policy-information_en

¹³ (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

¹⁴ [Hydrogen and Decarbonised Gas Market Package](#), European Commission, 2021

¹⁵ [ACER/CEER Annual Report on the Results of Monitoring the Internal Electricity and Natural Gas Markets in 2020](#), ACER/CEER, October 2021.

The results also show that many MS have at least one public CT that meets each of the minimum standards set in the recast Electricity Directive. For example, in 20 MS the public CT is independent from market participants. It is important to note that very few CTs include dynamic price contracts, likely due to the fact that dynamic contracts were not yet offered in all MS in 2020.

The ACER/CEER MMR reveals that there are a certain number of countries where households and microenterprises do not have access to an independent CT of high-quality. As the recast Electricity Directive does not define what “covering the entire market” means, the criteria for exhaustiveness is balanced against the criteria for comparability and for accurate information. For NRAs, or other public bodies that operate CTs, including all available contract types might mean allocating more resources to monitoring and ensuring that the information on the CT is accurate and up-to-date. It could also mean more complexity for consumers who wish to compare contracts against a multitude of offers.

The ACER/CEER MMR concludes that there is no strong correlation between the number of CTs, or the existence of a public CT, and how difficult or complex consumers believe it is to compare contracts from different electricity suppliers.

1.2. Objective and scope

CEER fully recognises that European energy customers need sufficient and reliable information to empower them to take an active role in liberalised energy markets and to make the green transition successful. CTs can offer easier access to useful, reliable and usable information on available offers.

CEER is also aware that retail energy markets are significantly evolving due to various factors. This includes new opportunities offered by the spread of advanced technologies, such as smart meters and smart grids, and the emergence of new ways to enable consumers to play an active role, such as collective switching or demand response schemes. These developments are already having an impact on how a well-functioning CT should operate, and greater impacts can be expected in the future.

As ten years have elapsed since the publication of the first GGP and five years since the last update, CEER decided to check whether, and how, the existing recommendations can be enhanced to ensure that they still address the key needs of consumers, both at present and in the predictable future.

1.2.1 PEER Workshop and public consultation

To provide a solid basis for the update, CEER organised the digital PEER Regulatory Roundtable on Digital Comparison Tools in Customer Journeys (held on 7 – 9 June 2021) (the PEER Roundtable) to discuss relevant issues regarding the CT market with multi-sector experts. This included regulators, legislators, academics, private sector companies and consumer organisations. The presentation and discussion during the PEER Roundtable supported the review of the 2017 GGP in light of the particularly dynamic nature of contracts in various national markets.

At the end of 2021 (with an 18 February 2022 response deadline) CEER launched a public consultation to evaluate whether the updated GGP fit with stakeholders' opinions. The input and feedback were considered by the drafting team. The questions and details of the public consultation can be found in Annex 2.

1.3. Regulatory framework

Different provisions in the EU legislation cover aspects that can be related to the functioning of CTs. Horizontal legislation includes the Directives on Unfair Commercial Practices¹⁶, on Consumer rights¹⁷ and on E-Commerce¹⁸. In the energy sector, the CEP¹⁹ and the Energy Efficiency Directive²⁰ (with regard to metering and consumption data) are relevant to the issue. Please note that the gas market rules are currently being updated and may differ from those in electricity market.

Compliance with the Unfair Commercial Practices Directive is addressed in the European Commission's Key Principles for Comparison tools^{21/22} (Key Principles). Though the CEER GGP do not refer to legislative compliance or enforcement, many of the points covered by the Key Principles and the CEER recommendations address the same issues and offer similar indications.

There are a range of routes to setting standards for CTs. Consumer confidence and the reliability of CTs can be enforced by a range of alternatives. General consumer legislation – together with regulatory intervention, where appropriate – already provide an efficient way to enforce CTs' reliability. NRAs or another public body may establish a code of conduct, a charter, a trust mark or a verification scheme for CTs, or they may regulate private CTs or establish their own CT where no such private service exists or to complement commercial CTs.

Whatever the route, it is important that CTs are independent from energy supply companies, that they are accurate and that they are - and are felt as being - reliable for customers. Customers need clear, comprehensive and comprehensible information, and CTs should help them understand and use this information. The present GGP provide recommendations, although they are not intended to provide a set of minimum requirements for a certification scheme on CT reliability.

¹⁶ [Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market.](#)

¹⁷ [Consolidated text: Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council \(Text with EEA relevance\).](#)

¹⁸ [Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market \('Directive on electronic commerce'\).](#)

¹⁹ "Clean Energy for All Europeans Package", European Commission, 2019. Retrieved from: https://energy.ec.europa.eu/topics/energy-strategy/clean-energy-all-europeans-package_en

²⁰ "Energy Efficiency Directive", European Commission. Retrieved from: https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficiency-targets-directive-and-rules/energy-efficiency-directive_en

²¹ "Key Principles for Comparison Tools", European Commission. Retrieved from: https://ec.europa.eu/info/sites/default/files/key_principles_for_comparison_tools_en.pdf

²² The Key Principles include in their scope all digital content and applications developed to be used by consumers to compare products and services, irrespective of the device used (laptop, mobile devices, etc.) or the parameters on which the comparison is based (price, quality, user reviews, etc.).

2. Updated recommendations

This chapter presents the updated recommendations for CTs. These final recommendations also take into account views received during the PEER Roundtable in June 2021. These recommendations are addressed to MS, NRAs, public bodies, customer organisations, CT providers and energy suppliers. NRAs should share these GGP with CT providers and suppliers. Energy suppliers have a responsibility to work constructively with CT providers.²³

2.1. “Virtual” suppliers and automatic switching

Automated switching of energy suppliers can benefit consumers by outsourcing their search for an energy supplier and the end-to-end management of this relationship. CTs – as well as other service providers – may offer those services. For example, in addition to comparing the supply offers, they can switch consumers over to the best tariff and manage the migration from the old supplier to the new one. Automated switching services may make holistic decisions about which suppliers to switch to based on consumer preferences such as green energy or length of contract. Consumers should be notified in advance before automatic switching to a different supplier takes place.

Automated switching services run by CTs result in several issues regarding the consumer-CT relationship. Firstly, automated switching services claim to find customers the best deal, but this may not include all available offers. This is linked to recommendation 5 on exhaustiveness.

Secondly, consumers must transfer almost all relevant information to the CT, which results in an information imbalance between the CT and the consumer. This requires a very trustworthy contractual relationship and asks for robust data protection.

Thirdly, the CT may also have contractual relationships with suppliers and these relationships must be transparent to the consumer to enable them to make an informed decision.

Lastly, as automated switching services may not favour some suppliers, some offers may not be available to consumers anymore. Beside the economic implications, this business model may also require legislative controls to ensure automated switching services fulfil all existing consumer protection laws.

Responses to the public consultation were mixed regarding this recommendation. In making this recommendation, we note the concerns raised about whether automated switching services are appropriate for consumers, whether it could lead to short-term pricing which destabilises the longer-term pricing of energy and the need for safeguards for consumers when using such services. Having effective safeguards and allowing consumers the ability to consent to any switch before it takes place may help to limit the potential for consumer harm arising, if switching has no mechanism for reversing the automatic switch. Consumers will need to be fully aware of the risks of such services before they sign up.

²³ For example, if there are many complex offers in the market, it will be difficult for the CT to present them in a clear way.

New recommendation 3:

When offering new services like automated switching, CTs must ensure that such business models are in line with existing consumer rights. These new services imply a higher need for transparency, as the service provider has more information than the consumer, and relevant contractual relationships with suppliers need to be made clear to consumers. This is increasingly relevant in situations where the CT signs contracts on behalf of the consumer, which should also fit with the consumer's preferences. The consumer should be informed in advance before automatic switching takes place and must agree to the switch.

2.2. Ranking, pre-setting and consumer ratings

CTs may apply “pre-settings” to the first search ranking, excluding tariffs that have “unfair” conditions (e.g. pre-payment, length of contract, cancellation deadline, etc.). Another example of pre-setting is limiting the number of tariffs per supplier or the exclusion of bonuses. These pre-settings have to be transparent for the consumer and reversible, as many CTs operate with pre-settings and pre-selection. Even more relevant for consumers is the exclusion of tariffs due to the absence of a CT-supplier relationship. CTs have to be very clear in communications regarding their market cover rate and excluding reasonable offers. Therefore, CTs should tend to cover the entire market, and if they do not succeed in that, they should be transparent about it, as underlined by recommendation 5 on exhaustiveness.

In particular, private CTs also often use “Position 0” (such as “best user rating”, “our best”, “best green offer”...). These offers are typically presented twice (Position 0 and in ranking). Position 0 criteria have to be trustworthy and assessable by the user. A comparable instrument is the presentation of “exclusive” or “limited” offers. In this case, CTs also have to be transparent on their conditions, explain their chosen parameters and the definitions used for this kind of offer positioning.

Today, user ratings are more and more relevant for consumer decisions and thus for CTs. The criteria for user ratings must be transparent. In some cases, user ratings are limited to contract relationships, meaning consumers can only rate by confirming their use of the rates offered. In the case of private CTs, this may limit the reliability of user ratings as the CTs might only offer user ratings for commission-based offers. This information must be made transparent to the user.

Updated recommendation 8:

CTs should offer additional information on the listed offers, in case the consumer wishes to use such information to help them choose the best offer that will meet their needs. Where additional information based on subjective parameters is offered (for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.), the CT should clearly disclose the nature of the information, the parameter used and the origin of the underlying data, to favour customer awareness.

Pre-settings of the search tool must be clear for everyone and adjustable by the consumer. When offering any results in a “Position 0”, the selection criteria must be clear for the user. To ensure independence, stated in recommendation 1, and transparency, stated in recommendation 4, non-objective rankings of commercial agreements (such as Position 0) should be clearly distinguishable from search results.

2.3 Accessibility

There are customers who do not have access to the internet or are not confident using the internet for price comparisons. CTs that do not provide information through additional channels exclude such customers. Thus, the principle in the 2012 GGP regarding additional communication channels (other than internet), free of charge or at minimal cost, remains valid. The internet has progressed hugely since the 2012 GGP, resulting in a whole new range of tools (e.g. apps) and gadgets that have changed the way people interact with the internet. As a result, the 2017 GGP already updated this recommendation.

As the internet is more and more present in our daily lives through an increasing variety of forms, and not only via a computer, the present revision encourages the provision of CT services through all new types of internet interface through different devices whenever possible. This way, accessibility for customers will be improved, while maintaining the same level of accuracy. The 2022 GGP update also suggests highlighting digitally excluded persons, as well as customers with disabilities. In **Annex 3**, a case study from Austria shows an example of how to deal with this issue.

Updated recommendation 11:

To ensure an inclusive service, at least one additional communication channel (other than the internet) for accessing a comparison should be provided, free of charge or at minimal cost at least by the CT covering the entire market. This channel should take into account all digitally excluded persons who are excluded by choice or by default. For example, comparison information could be made available via local authorities, citizen information offices, consumer associations or other bodies.

Also, customers with disabilities (visual and/or hearing impairment) must not be left behind and should have access to a CT. In this regard, CTs could provide integrated accessibility options such as sound amplifiers, magnification tools and features to increase the font sizes, as well as colour correction for colour blindness, and voice accessibility for blind and visually impaired consumers.

Whenever possible, CTs should adapt to the continuing development of technological devices (smart phones, tablets, new gadgets...) to be accessible for customers in the widest variety of forms with the same level of accuracy.

2.4. Information on energy source

Consumer choice is the key to successfully transforming the energy system. Therefore, by using a CT and by having a choice of green offers, customers play a role in the energy transition. Green offers play a major role and having trustworthy information at the moment of choosing a supplier enables the consumer to make a proper choice. When CTs offer information on the source of energy (contract), the source and background of this information must be transparent and visible for the consumer. It must be clear what type of information was used and presented by the CT. A link to public information may support this process. If the CT uses a private source of information, the user must be able to access that source of information themselves.

Updated recommendation 15:

CT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across CTs can help to enable understanding. When offering information on the source of energy, CTs should enable the consumer to assess this information in an easy and trustworthy way. For this reason, CTs should focus on reliable green claims pre-approved by NRAs or by other designated competent authorities, which should be featured in CTs.

2.5. Data protection, privacy and third party access

Data protection should be considered as high importance given the increase in the activity and services of (private) CTs. Transparency is a key issue for the consumer as they need to be aware of which kind of personal data is used for CT services. Consumer privacy must be ensured by informing the consumer that access to their data by a third party is limited, and only the necessary information for a comparison is used by the CT.

Data protection rules must be taken into account, therefore consumers must actively agree to the use of their personal data by the CT and/or third parties. The recast Electricity Directive addresses this important point by stating that CTs “shall perform comparisons, while limiting the personal data requested to that strictly necessary for the comparison.”²⁴ Nevertheless, digital services may require third party access to consumer/user personal data (e.g. real time consumption data, using data from a distribution system operator, etc.). In case of data exchange with third parties, the consumer/user must have the choice of sharing their data and actively agree to do so. The level of transparency should be at least the same as for other digital services.

New recommendation 16:

It must be transparent for consumers which personal data are used by the CT to provide its services and which data are shared with third party companies. The access to data should be limited to necessary data that will ensure the smooth operation of the CT. Consumers must have the final choice of sharing their data with the CT and/or third parties. The consumer must actively agree to the use and sharing of their personal data. Data protection rules must be in line with GDPR and privacy has to be ensured.

2.6. Bundled offer integration and new business models

As in other sectors like telecommunications or finance, bundled offers are becoming more and more relevant in the energy sector. Aside from the common linkage of gas and electricity supply market offers, bundled offers can also include “consumption goods” and/or infrastructure such as photovoltaic rooftops or batteries. Such bundles often contain leasing offers or rental agreements, which require additional contractual rules and may affect the “freedom” of choice of the energy supply. Although such offers may be useful and relevant for the consumer, the consumer has to be aware of all relevant legal issues and be informed about restrictions.

²⁴ Article 14 (1)(h) of the recast Electricity Directive.

If CTs include bundled offers, the CT provider has to make the comparison process with standard contracts simpler, and also point out all relevant legal issues. In particular, the share of the energy payment has to be clear, and restrictions must be pointed out. The same is true for new energy services such as aggregation. Comparing those services requires the same level of transparency as supply services.

Comparability and transparency are key principles that need to be followed when comparing bundled or new products. The distinction of energy and non-energy elements of offers also has to be ensured so that consumers can make a choice based on a rounded assessment of the bundled offer.

Updated recommendation 17:

CTs should be open to innovation to adapt to and reflect the evolution of the energy market: implementation of smart metering, electric vehicles, new pricing models and new business models (demand response, prosumer, aggregators...); thereby helping consumers to become active players in the energy market. If the CT has the ability to compare new business models, such as aggregation or bundled offers that are part of the energy retail markets, it should offer the same quality of comparison as for supply services. CTs must easily provide a means of distinguishing between energy and non-energy elements (and explain what these mean in the context of the offer).

2.7. Smart meter integration and secure data transfers

As smart meters become increasingly important and due to the fast roll-out across Europe, the number of smart meters will increase significantly over the next few years. The use of smart meters should benefit the consumer. One way it can do this is to ease the use of CTs by enabling remote reading and therefore increase the quality of (individual) comparison. By taking into account almost real time and specific individual consumption data, the quality of the resultant comparison will be improved for the consumer.

To ensure this kind of service, a secure and (if feasible) anonymous data transfer has to be guaranteed and be transparent to the user. The use of data should be limited to the comparison and exclusively used by the CT on behalf of the consumer.

Updated recommendation 18:

CTs should adapt to the development and deployment of smart meters, being able to process data from them and provide customers with more accurate comparisons and analysis depending on their consumption habits and, in general, on the circumstances that may affect the results of the comparison. The use of smart meter data should be limited to the individual comparison, and data protected in line with the existing legal requirements, which must be ensured by the CT.

2.8. Dynamic price contracts

According to Article 14 of the recast Electricity Directive “Member States shall ensure that at least household customers, and microenterprises..., have access, free of charge, to at least one tool comparing the offers of suppliers, including offers for dynamic electricity price contracts”²⁵, and that “Member States shall ensure that at least one tool covers the entire market”²⁶. Moreover, Article 11 of the recast Electricity Directive states that “Member States shall ensure that final customers who have a smart meter installed can request to conclude a dynamic electricity price contract with at least one supplier and with every supplier that has more than 200 000 final customers.”²⁷

The availability of dynamic electricity price contracts is mandatory (in the medium term), taking into account the roll-out of smart meters.²⁸ Suppliers will adapt to these rules and the retail market is fast evolving. Therefore, CTs need to adapt to this challenge of incorporating dynamic electricity price contracts to cover all market offers. In doing so, the consumer will require guidance to assess the risks and benefits of dynamic offers, allowing them to make informed choices. Indeed, although suppliers have to inform the consumers, CTs should complement this role. CTs can support, educate and empower their users by increasing the level of transparency and information available to consumers, so that they can make a fully informed choice.

Consumers should be informed of the level of risk and benefits related to the volatility of prices when opting for a dynamic price contract. In educating customers about dynamic price contracts CTs should help them understand how they can shift their consumption according to price signals and how to adapt their comfort without negatively impacting their energy bill.

The 2020 CEER paper on Recommendations on Dynamic Price Implementation²⁹ points out the difficulty of using CTs when it comes to comparing dynamic price contracts to standard offers, noting “there is a significant risk that the potential benefits related to dynamic offers are not properly valued by CTs, and so information provided could mislead the consumer when making their choice. Therefore, price CTs are required to communicate effectively on the difference between contracts.”

The comparison of dynamic offers needs the same level of quality as for conventional contracts. As the consumer has no/little experience with these offers, CTs should support their users by providing detailed information. Dynamic price offers should not be compared to conventional contracts without clear commentary or by user-choice.

²⁵ Article 14 (1) of the recast Electricity Directive.

²⁶ Article 14 (1) of the recast Electricity Directive.

²⁷ Article 11 (1) of the recast Electricity Directive.

²⁸ Article 19 of the recast Electricity Directive.

²⁹ [CEER Recommendations on Dynamic Price Implementation](#), March 2020, Ref. C19-IRM-020-03-14.

New recommendation 19:

As dynamic electricity price offers must be included in CTs, the level of quality of the comparison should be at least the same as for conventional offers. Moreover, there needs to be more detailed information about dynamic electricity price contracts, given that the consumer may not have enough experience with the pros and cons of these offers. Therefore, the CT should feature clear and factual information about the potentially high price volatility. CTs could complement suppliers' information about these types of contracts, as it is difficult to compare between dynamic offers and other standard offers. In this regard, before showing the results, CTs should ask whether the consumer would like to compare a dynamic price offer or a standard offer.

2.9. Signposting of additional services information (i.e. energy efficiency, social care and government schemes)

Aside from their primary role as instruments used to compare the prices of different energy supply offers and, in this way, allowing consumers to choose the best offer for their needs, CTs can also be used to promote different energy efficiency, social care, technical assistance or schemes implemented by public bodies. Such services can be used by consumers to their benefit. In this regard, CTs could list the availability of such services and schemes in an energy supply offer, in the same way that they would list offers that are bundled with other consumption goods, be they energy-related or not (see recommendation 17). A Portuguese case study on additional services can be found in Annex 4.

Consumers must be given the option to choose a search that includes offers with and without additional services attached.

New recommendation 20:

In addition to providing a fair and reliable comparison, CTs should inform consumers about any additional services, such as energy efficiency equipment support, social care or technical assistance, that are promoted by service providers, to the extent possible. When proposed, such extra services, as well as their specific conditions, should be clearly explained in the contract terms.

Also, CTs should provide the possibility for the consumer to compare offers with or without these types of services.

Annex 1 – List of abbreviations

Term	Definition
ACER	Agency for the Cooperation of Energy Regulators
CEER	Council of European Energy Regulators
CT	Comparison tool
EU	European Union
GDPR	General Data Protection Regulation
GGP	Guidelines of Good Practice
MS	Member State(s)
NRA	National Regulatory Authority
PEER	Partnership for the Enforcement of European Rights
WCAG	Web Content Accessibility Guidelines

Annex 2 – Public consultation

CTs are an important aspect of the energy markets. They can empower energy consumers, to the extent that they deliver a clear and trusted service that provides additional and relevant information to consumers, so that they can choose the best offer to fit their needs. In this regard, CEER sought feedback on the update of its GGP on CTs.

The draft GGP on CTs was open to public consultation from December 2021 until February 2022. The purpose of the consultation paper was to present a preliminary review of the 2012 GGP and 2017 GGP. These GGP included a set of 16 recommendations on how comparison tools can function efficiently and effectively to the benefit of energy customers. The 2022 GGP reinforces and enhances the recommendations already issued. It aims to align them with the requirements established in EU legislation as well as enable their sound development in the future as a function of market innovation, while ensuring consumers' best interests.

The target audience for this consultation was energy suppliers, traders, prosumers, electricity and natural gas customers, electricity and natural gas industry, customer representative groups, network operators, MS, academics and other interested parties.

Questions to the stakeholders

In the public consultation, CEER presented its reconsidered/updated 20 recommendations giving stakeholders the opportunity to comment on the draft proposals. The updates took into account the adoption and entry into force of the recast Electricity Directive, which includes specific provisions regarding CTs, as well as the continuing technological and market evolution of the energy sector. Whilst the emergence of innovative business models and digital information tools can help to empower consumers to engage with the energy market, it must be ensured that they provide an accurate, reliable and accessible service.

In line with its public consultation practices, the responses received were discussed within CEER and taken into account to enhance the final GGP. CEER finds from the answers received, that there is strong support for further guidance regarding CTs. Mainly, all the respondents were in favour of the draft recommendations and also provided very valuable comments and additions to them. As a result, CEER made modifications and clarifications to some of the recommendations.

Updated and new recommendations are marked in blue and **bold**.

Some of the respondents wished to keep their answers confidential. Therefore, CEER decided only to name the respondents. The following institutions participated:

- Latvenergo AS – Energy supplier Latvia
- Romanian Ministry of Energy - Romania
- BEUC – The European Consumer Organisation
- ENGIE – Energy Supplier France
- Médiateur national de l'énergie – Energy National Ombudsman France
- ENEL Spa – Energy supplier
- EDF – Energy supplier France

CEER has evaluated the responses provided in the public consultation, principally in terms of

applicability and consistency. Respondents had the opportunity to answer whether they thought that the proposed recommendation was sufficient in the consultation document and in addition they could insert a comment on the rationale for their position or other suggestions. CEER has received valuable input during the public consultation. Where appropriate, the comments, suggestions and input received were reflected in an amended recommendation in the final GGP. The table below indicates the number of respondents making each of four possible choices evaluating the proposed recommendation.

In light of the responses received, CEER considers it important that the following is taken into account when interpreting the GGP:

- CEER would like to point out that as its GGP is written from a customer perspective, it gives the input from consumer organisations particular consideration; and
- CEER intends for the final recommendations to have a forward-looking approach, and so has taken a forward-looking approach in drafting its final GGP.

Recommendation	Recommendation is sufficient	Recommendation is sufficient, but to add/clarify more	Recommendation is not sufficient	No opinion	Consequence on recommendation / CEER reaction
1	3	3	1		Not changed
2	2	5			Slightly changed
3	3	3	1		Slightly changed
4	4	3			Slightly changed
5	2	5			Amended
6		4	1	2	Amended
7	2	4		1	Slightly changed
8	2	2	3		Amended
9	3	3		1	Not changed
10	4	3			Slightly changed
11	6	1			Slightly changed
12	5			2	Not changed
13	2	3	2		Slightly changed
14	5			2	Not changed
15	4	3			Amended
16	5	2			Slightly changed
17	3	4			Slightly changed
18	6			1	Slightly changed
19	4	3			Amended
20	5	3			Amended

Table 2 – Number of public consultation responses received and CEER response

Updated CEER recommendations		Relevant provision in recast Electricity Directive 2019/1944	Summary of responses
I	Independence of the tool		
1 Updated	<p>Any CT must be independent of energy supply companies, giving the user a non-discriminatory overview of the market.</p> <p>The provider of a comparison tool should show all information in a clear, simple and consistent way.</p>	<p>Article 14 (1)(a): The tools (...) shall be independent from market participants and ensure that electricity undertakings are given equal treatment in search results;</p>	<p>The participants agreed to this update but also stressed the need for further clarity in CTs, especially when they are operated by private entities or vertically integrated utilities. In addition, they pointed out the necessity for the CT information for new and existing offers to be regularly updated by the operators.</p>
2 Updated	<p>Ensuring the reliability of CTs is crucial to protecting and empowering customers. The best way to achieve this goal can be efficiently defined at national level, taking into account the maturity and competitiveness of both the comparison market and the energy market, and could be implemented with the active role of NRAs or other public bodies.</p> <p>NRAs or another public body may also decide to establish their own reliable CT service where no private service exists or to complement commercial CTs and may consider ways to promote the service to customers. Information about the availability of CTs should be found on the consumer bills or by other means giving the possibility for the consumers to easily find and access the CTs.</p>	<p>Article 14 (1): Customers shall be informed of the availability of such tools in or together with their bills or by other means.</p> <p>Article 14 (2): The tools (...) may be operated by any entity, including private companies and public authorities or bodies.</p> <p>Article 14 (3): Member States shall appoint a competent authority to be responsible for issuing trust marks for comparison tools that meet the requirements.</p>	<p>The participants overwhelmingly agreed to support this update, while some noted that the information on the availability of CTs in consumer bills should be limited to CTs operated by public authorities.</p>

<p>3 All New</p>	<p>When offering new services like automated switching, CTs must ensure that such business models are in line with existing consumer rights. Moreover, these new services imply a higher need for transparency, as the service provider has more information than the consumer and relevant contractual relations with suppliers need to be clear for consumers. This is increasingly relevant in situations where the CT signs contracts on behalf of the consumer, which should also fit with the preferences of the consumer. The consumer should be informed in advance before automatic switching takes place and must agree to the switch.</p>		<p>Many participants agreed to this new recommendation. Some amendments were suggested. Some stakeholders favour non-agent CTs, while others consider that automated switching could interfere with the proper functioning of the energy markets and that it goes beyond the usual functions of CTs.</p>
<p>II</p>	<p>Transparency</p>		
<p>4 Updated</p>	<p>CTs should disclose the way they operate, their funding and their owners/shareholders, in order to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers before the results of the comparison simulation are shown.</p> <p>Advertisement and/or sponsored products should be clearly identified and separated from the comparison results.</p> <p>Information about the availability of CTs should be found on the consumer bills or by other means giving the possibility for the consumers to easily find and access the CTs.</p>	<p><i>Article 14 (1)(b): The tools (...) shall clearly disclose their owners and the natural or legal person operating and controlling the tools, as well as information on how the tools are financed;</i></p> <p><i>Article 14 (1): Customers shall be informed of the availability of such tools in or together with their bills or by other means.</i></p>	<p>The participants agreed to this minor update. Some stakeholders favour even stronger transparency rules, especially regarding sponsorship and any potential relations between the CTs and energy suppliers.</p>

III	Exhaustiveness		
5 Updated	<p>CT coverage of the market should be as complete as practicable. If the information presented does not offer a complete overview of the market, the CT should clearly state this before showing the results of the comparison simulation – if feasible, also naming the missing supplier(s) – as well as on the comparison results screen.</p> <p>All prices and products covered by the CT and available to the customer on the basis of general selection criteria (e.g. the area where the supply is located, or a given customer segment) should be shown as a first step in the comparison results screen.</p>	<p>Article 14(1): Member States shall ensure that at least one tool covers the entire market. Where multiple tools cover the market, those tools shall include, as complete as practicable, a range of electricity offers covering a significant part of the market and, where those tools do not completely cover the market, a clear statement to that effect, before displaying results.</p>	<p>The participants agreed to this minor update as they consider that the CTs should be as exhaustive as possible and inform the consumers if there are additional offers that are not listed in the comparison screen. Nevertheless, some participants are in favour of public supervision as private tools may not be able to fulfil this task.</p>
IV	Clarity and comprehensibility		
6 Original	<p>Costs 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. Any discounts should be clearly described, specifying when those discounts end; discounts which are subject to conditions or restrictions should be clearly separated from total cost estimation.</p>		<p>The participants agreed and provided some amendments and feedback, mainly regarding the display of information related to discounts, indexed offers, and annual and per-KWh costs. CEER took them partly into account. The recommendation was slightly updated.</p>

	<p>CTs should clearly indicate that prices shown as a total cost are an estimation, as they are based on historic or estimated consumption and on price information available at present. The same warning should be indicated where a CT offers an estimation of potential savings that might be obtained by switching to listed offers.</p> <p>Access to additional information on cost details (e.g. unit prices, cost components...) and on the methodology used for total cost or potential savings estimation should also be made available to customers.</p>		
<p>7 Original</p>	<p>Fundamental characteristics of all products should be presented on the first page of the result screen, adopting appropriate graphic or hypertext solutions in order to facilitate visibility and comprehension.</p> <p>This information should refer both to price (for example, fixed or floating price; time of use or flat price...) and to other fundamental features (for example, main contractual terms, bundled services or products, origin of energy production...).</p> <p>Explanations of the different characteristics should be available as second-level information to help the customer understand their options.</p>		<p>The participants agreed and provided some amendments, mainly regarding the display of the relevant offer information to the consumer, keeping it as concise as possible. CEER partly took the feedback into account. The recommendation was slightly updated.</p>

8 Updated	<p>CTs should offer additional information on the listed offers, in case the consumer wishes to use such information to help them choose the best offer that will suit their needs. Where additional information based on subjective parameters is offered (for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.), the CT should clearly disclose the nature of the information, the parameter used and the origin of the underlying data, in order to favour customer awareness. Pre-settings of the search tool must be clear for and adjustable by the consumer. When offering any results in a "Position 0"³⁰, the selection criteria must be clear for the user.</p>		<p>The participants mainly agreed and provided some amendments that CEER took partly into account. Some concerns were raised about the "Position 0", and the recommendation was slightly updated.</p>
V	Correctness and Accuracy		
9 ORIGINAL	<p>Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market. CTs should rectify without delay any incorrect information on published offers. In order to achieve this, they should provide a quick and effective procedure allowing any interested party to report incorrect information.</p>	<p>Article 14 (1)(e) and (g): The tools (...) shall provide accurate and up-to-date information and state the time of the last update; they shall provide an effective procedure for reporting incorrect information on published offers;</p>	<p>The participants agreed noting that the information in CTs should be periodically updated to ensure accuracy and reliability. This recommendation was not updated</p>
VI	User-friendliness		

³⁰ Promoting an offer before the first placed ranking.

<p>10 UPDATED</p>	<p>Customers should be allowed to introduce their consumption data in a simple and friendly manner. In addition, CTs should offer help through default consumption patterns or, preferably, using a tool that calculates the approximate consumption, based on information available to and that can be easily provided by the user.</p>	<p>Article 14 (1)(d): The tools (...) shall use plain and unambiguous language;</p>	<p>The participants agreed and provided some amendments that CEER took partly into account. Some participants noted the importance of the user's ability to provide their consumption data to achieve the best possible offer results for their profile. The recommendation was updated focusing on technical issues.</p>
<p>VII</p>	<p>Accessibility</p>		
<p>11 Updated</p>	<p>To ensure an inclusive service, at least one additional communication channel (other than the internet) for accessing a comparison should be provided, free of charge or at minimal cost, by the CT covering the entire market. This channel should take into account all the digitally excluded persons who are excluded by choice or by default. For example, comparison information could be made available via local authorities, citizen information offices, consumer associations or other bodies. Also, customers with disabilities (visual and/or hearing impairment) must not be left behind and should have access to a comparison tool. In this regard, CTs could provide integrated accessibility options such as sound amplifiers, magnification tools and features to increase the font sizes as well as colour correction for colour blindness, voice accessibility for the blind and the visually impaired consumers.</p>	<p>Article 14 (1)(f): The tools (...) shall be accessible to persons with disabilities, by being perceivable, operable, understandable and robust;</p> <p>Article 14 (1)(par. 2): Member States shall ensure that at least one tool covers the entire market.</p>	<p>The participants strongly agreed and supported the principle of inclusiveness, in particular to vulnerable, elderly and disabled consumers, as well as the possible solutions to tackle the digital divide. The feedback provided was taken into account and CEER made some amendments to the recommendation.</p>

	Whenever possible, CTs should adapt to the continuing development of technological devices (smart phones, tablets, new gadgets...) in order to be accessible for customers in the widest variety of forms with the same level of accuracy.		
12 ORIGINAL	Online 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.	Article 14 (1)(f): The tools (...) shall be accessible to persons with disabilities, by being perceivable, operable, understandable and robust;	The participants agreed. This recommendation was not updated
VIII	Customer empowerment		
13 UPDATED	<p>CTs should offer navigation tools such as filtering or alternative ranking functionalities, based on fundamental features of listed products, helping customers to select the best offers for them. The default ranking should be based on price criteria.</p> <p>CTs should be transparent about the criteria on which navigation tools are based. Where navigation tools are based on subjective parameters (for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.), CTs should clearly disclose the nature of the parameter and the origin of the underlying data, in order to favour customer awareness.</p>		The participants agreed and provided some amendments which CEER largely took into account. Most notably, that transparency is the key for the functionality outlined in this recommendation, although there were some concerns about the risk of misleading customers when there is a subjective parameter.
14 Original	CT providers should consider how best to empower customers to use their service and make appropriate choices for their needs.		The participants agreed. Recommendation was not updated

	Background information on market functioning, on market issues such as price developments, and links to useful independent sources of information may be provided to help the customers.		
15 Updated	CT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across CTs can help to enable understanding. When offering information on the source of energy, CTs should enable the consumer to assess this information in an easy way.	Article 14 (1)(d): The tools (...) shall use plain and unambiguous language;	The participants agreed and provided some amendments that CEER largely took into account.
16 All New	It must be transparent for consumers which personal data are used by the CT to provide its services and which data are shared with third party companies. The access to data should be limited to necessary data that will ensure the smooth operation of the CT. Consumers must have the final choice of sharing their data with CT and/or third parties. The consumer must actively agree to the use and sharing of their personal data. Data protection rules must be taken into account and privacy has to be ensured.	Article 14 (1)(h): The tools (...) shall perform comparisons, while limiting the personal data requested to that strictly necessary for the comparison.	The participants agreed and provided some amendments that CEER took partly into account. Stakeholders pointed out that this has to be in line with GDPR.
IX	Dynamic market developments		

<p>17 Updated</p>	<p>CTs should be open to innovation in order to adapt to and reflect the evolution of the energy market: implementation of smart metering, electric vehicles, new pricing models and new business models (demand response, prosumer, aggregators...); thereby helping consumers to become active players in the energy market. If the CT has the ability to compare new business models, such as aggregation or bundled offers that are part of the energy retail market, it should offer the same quality of comparison as for supply services. CTs must provide easily a means of distinguishing between energy and non-energy elements (and explain what these mean in the context of the offer).</p>		<p>The participants agreed and provided some amendments that CEER took partly into account. (Technological) differences between gas and electricity were pointed out. The stakeholders highlighted that there could be many differences in new innovative offers that include additional services (such as demand response, self-consumed electricity, market vouchers etc.). Sometimes it is difficult to compare these offers taking into consideration all the disparate information, but ultimately the offers must be presented in an accurate, transparent and clear manner to the consumer.</p>
<p>18 Updated</p>	<p>CTs should adapt to the development and deployment of smart meters, being able to process data from them and provide customers with more accurate comparisons and analysis depending on their consumption habits and, in general, on the circumstances that may affect the results of the comparison. The use of smart meter data should be limited to the individual comparison and data protection in line with the existing legal requirements, which must be ensured by the CT.</p>		<p>The participants agreed and some noted the importance of the functionality for consumers to be able to input their consumption data from smart meters into the CTs to get the best results for their consumption profile (in particular referring to dynamic offers).</p>

<p>19 All New</p>	<p>As dynamic electricity price contracts must be included in CTs, the level of quality of the comparison should be at least the same as for conventional offers. Moreover, the level of information about dynamic electricity price contracts needs to be higher because the consumer may not have experience with the pros and cons of these offers.³¹ CTs could complement suppliers' information about these types of contracts, as it is difficult to compare between dynamic offers and other standard offers. In this regard, before showing the results, CTs should ask whether the consumer would like to compare a dynamic price offer or a standard offer.</p>	<p>Article 14 (1): Member States shall ensure that at least household customers, and microenterprises with an expected yearly consumption of below 100 000 kWh, have access, free of charge, to at least one tool comparing the offers of suppliers, including offers for dynamic electricity price contracts.</p> <p>Article 11 (2): Member States shall ensure that final customers are fully informed by the suppliers of the opportunities, costs and risks of such dynamic electricity price contracts, and shall ensure that suppliers are required to provide information to the final customers accordingly, including with regard to the need to have an adequate electricity meter installed.</p>	<p>The participants agreed and provided some amendments that CEER largely took into account (e.g. challenges in comparison and provision of information).</p>
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³¹ A consumer search of dynamic price contracts on a CT should, as a minimum, ensure that the CT meets all the other CT recommendations which apply to a conventional offer, as well as any additional level of quality for a dynamic electricity price contract search.

<p>20 All New</p>	<p>In addition to providing a fair and reliable comparison, CTs should inform consumers about different energy efficiency, social care and other public (energy-related) schemes that are being promoted by public bodies/authorities, to the extent possible.</p>		<p>The participants mainly agreed. Some stakeholders consider that the provision of such services should not be the primary objective of the CTs. The recommendation was not changed.</p>
	<p>GENERAL ADDITIONAL COMMENTS</p>		<p><u>Reporting</u> <i>To ensure maximum coverage, energy companies should be required to provide regulators and comparison tools with details of all the tariffs that they offer at any point in time. Companies should provide information both about offers which consumers can still subscribe and also about those for which this is not possible any more. This ensures that the tool has all the necessary data and information allowing consumers to compare their current contract (which may not be subscribable any more) with others that they could switch to.</i></p>

			<p><i>Regulators should maintain an exhaustive and up-to-date database in a format that can be easily accessible and usable for comparison tools operators. The results of comparison tools should reflect at all times the information contained in the database. In case regulators do not maintain this database, comparison tools operators should communicate what are the sources of the information that they use.</i></p> <p><u>Supervision</u></p> <p><i>Energy regulators or other competent authorities should proactively monitor the respect of these conditions in order to enhance consumer trust in the information provided by comparison tools. In addition, comparison tools should also provide consumers and companies an effective procedure to report incorrect information on published offers.</i></p>
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Table 3 – Summary of public consultation responses and CEER response³²

³² This table reflects the originally proposed amendments in the CEER Public Consultation on GGP for Future-proof Comparison Tools in the Energy Sector: <https://www.ceer.eu/pc-on-ggp-comparison-tools>
Following the analysis of responses, some recommendations were further modified into the final updated recommendations shown in chapters 1 and 2.

Annex 3 – Austrian case study on accessibility

Several comparison tools are useful for shopping around for electricity and gas offers in Austria. Yet, these tools only empower those households with access and ability to use the internet. According to a recent survey by the Austrian Statistical Office³³, 95% of all households had access to the internet in 2021 and 91% even had broadband access. A large majority, 92.5% of residents, used the internet in 2021 but usage levels dropped with age; only 65% of all persons aged 65-74 years use the internet.

However, using the internet is not to be equated with online shopping. In 2021, only 54% of the total population bought at least some product or service online. Among the 65–74-year-olds, this percentage drops to 25%. This is clear evidence that online CTs may not reach even half of the population of Austria. Hence, seeking ways to provide access to such comparisons to energy consumers who do not shop online is crucial for including them in the energy market and empowering them to reap benefits from alternative energy offers.

In Austria, there are two main ways for obtaining information about electricity and gas offers for people who are not able or willing to switch supplier and/or products using the internet on their own.

First, E-Control, the Austrian regulator for the electricity and gas markets, offers free-of-charge over-the-phone advice about alternative offers to any caller. Staff of the Energie-Hotline, the telephone service of E-Control, run an enquiry of E-Control's Tarifikalkulator³⁴, the comparison tool operated by the regulator, using the consumption and location data of the calling customer. Results are returned over the phone or via post and generally include contact details of each supplier within the comparison. In this case, energy customers would still have to contact the new supplier on their own, since E-Control does not offer switching services. Similarly, commercial CTs also provide telephone numbers for using their services offline.

Second, the Austrian postal service, Österreichische Post AG, offers in-person advice on electricity and gas offer comparisons in most of their outlets across Austria. Like the services of E-Control, Post AG staff members run a comparison on the Post AG's own CT, the Post Energiekosten-Rechner³⁵. Without the need for an appointment, energy customers walk in and only need to present customer and consumption details, their metering point identification number, payment details (IBAN) and sign a letter of attorney to successfully switch supplier or product using this free-of-charge service. In contrast to E-Control, Post AG offers a switching service, similar to commercial online CTs in Austria, so that energy consumers do not need to do anything else to switch supplier.

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http://www.statistik.at/web_en/statistics/EnergyEnvironmentInnovationMobility/information_society/ict_usage_in_households/index.html

34 <https://www.e-control.at/en/konsumenten/service-und-beratung/toolbox/tarifkalkulator#/>

35 <https://www.post.at/p/c/energiekosten-rechner>

Annex 4 – Portuguese case study on additional information

In Portugal, the large-scale dissemination of information about additional services and energy contracts began in the second half of 2016. At that time, and due to the many complaints received and analysis related to this subject, the Energy Services Regulatory Authority (ERSE) concluded that consumers were not aware of the obligations they were taking on when subscribing to these types of services. Many times, they could not find a clear separation between additional services and the energy supply.

To clarify the content of those additional conditions, ERSE published, in March 2017, a recommendation (Recommendation n.º 1/2017)³⁶ addressed to suppliers, that aimed to clarify the separation between the additional services and the energy supply contracted by the consumer. Aside from the need to fulfil some obligations related to the specific services offered by service providers, the recommendation also set out that whenever consumers wanted to switch their energy supplier, the existence of an additional service should not limit the right of supplier switching.

With the aim of providing clear and unambiguous information, and separation of the additional services, ERSE's public CT also gives consumers the option to include, or not, in the listed results, those offers that present other services (besides energy supply). All the options available are presented below, in the English version of ERSE CT.

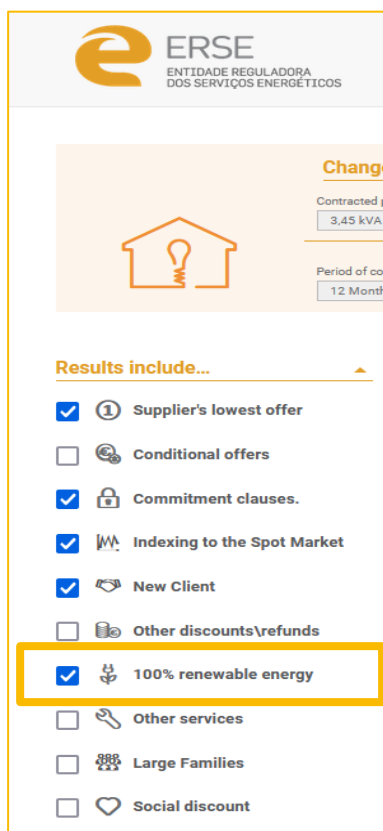


Figure 1 – Screen shot of available options on ERSE CT

³⁶ <https://www.erse.pt/media/ax4mraeu/recomendac%C3%A3o-n-%C2%BA-1-2017.pdf>

When choosing an offer that includes the need to contract an additional service, the summary of the offer also has detailed information about the “extra” service proposed.



Figure 2 – Screen shot of detailed information on extra services



Figure 3 – Screen shot of separated “other services” charges.

Annex 5 – Spanish case study on availability and user-friendliness

Electricity suppliers in Spain must include a QR code in their bills for household consumers (see example in Figure 4 below). This QR code contains the consumer's contract and consumption data. In the case of electronic bills, a link is included with the same data.

By scanning this QR code, or clicking on the link, consumers will access the National Markets and Competition Commission's (CNMC) CT with all the required fields automatically filled in with their actual consumption data. This functionality simplifies access, reduces the time required for the comparison process and allows a more accurate comparison, since consumers usually do not know about their own consumption data. Additionally, CNMC is working on its CT so consumers can compare their bills; again, without having to search for or fill in their contract and consumption data.

CNMC defined the following data to be included in the QR code:

- General consumer data: data that allows identifying the type of consumer; such as postal code, contracted capacity, type of contract (fixed or variable);
- Consumption and billing data:
 - Billing and year-on-year consumption by hourly periods of the access tariff. For household consumers, the access tariff is split into three different periods: peak period (highest price), standard period (intermediate price), off-peak period (lowest price); and also into two different capacity periods: peak and off-peak.
 - Billed amount.
- Additional information about additional services, self-consumption surpluses or other concepts, such as contract termination fees; and
- Other data, in anticipation of possible new developments of the CT: supply point identification code, supplier name or the maximum capacity demanded by the consumer.

The QR code has been widely welcomed and around 20% of consumers are accessing the CT via the QR code or link available in their bills.


DESGLOSE DE LA FACTURA		i)
Facturación por potencia contratada ("TÉRMINO FIJO")	xx,xx€	
Importe por peajes de transporte y distribución y cargos:		
P1 (punta): xx kW * xxxx €/kW y año * (xx/365) días	xx,xx €	
P2 (valle): xx kW * xxxx €/kW y año * (xx/365) días	xx,xx €	
Margen de comercialización fijo: xx kW * xx €/kW y año * (xx/365) días	xx,xx €	
Facturación por excesos de potencia ("TÉRMINO FIJO") (si procede)	xx,xx€	
P1 (punta):	xx,xx €	
P2 (valle):	xx,xx €	
Facturación por energía consumida ("TÉRMINO VARIABLE")	xx,xx€	
Importe por peajes de transporte y distribución y cargos:		
P1 (punta): xx kWh * xxxx €/kWh	xx,xx €	
P2 (llano): xx kWh * xxxx €/kWh	xx,xx €	
P3 (valle): xx kWh * xxxx €/kWh	xx,xx €	
Coste de la energía	xx,xx €	
Facturación por energía excedentaria del autoconsumo	- xx,xx€	
Ajuste límite de compensación por autoconsumo	xx,xx€	
Impuesto de electricidad: xx% s/ xx,xx	xx,xx €	
Alquiler del contador: xx días * xx,x €/día	xx,xx €	
Impuesto de aplicación: xx% s/ xx,xx	xx,xx €	
TOTAL IMPORTE FACTURA	xx,xx €	
<i>Precios de los términos del peaje de transporte y distribución, de los cargos, del contador y margen de comercialización fijo según normativa en vigor PVPC calculado según Real Decreto xxxx (disposición normativa).</i>		
INFORMACIÓN PARA EL CONSUMIDOR		j)
Usted tiene contratado el Precio Voluntario para el Pequeño Consumidor (PVPC) . No obstante, puede contratar también con cualquier comercializadora en mercado libre. El listado de comercializadoras de referencia y de comercializadoras de mercado libre está disponible en la página web de la CNMC: www.cnmc.es		
En el código QR o en el enlace comparador.cnmc.gov.es puede consultar y comparar las distintas ofertas vigentes de las comercializadoras de energía eléctrica en mercado libre		
Si está recibiendo su factura en papel, puede solicitar en su lugar la factura electrónica en www...		

Figure 4 – Example bill containing QR code

Annex 6 – About CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national energy regulators. CEER's members and observers comprise 39 national energy regulatory authorities (NRAs) from across Europe.

CEER is legally established as a not-for-profit association under Belgian law, with a small Secretariat based in Brussels to assist the organisation.

CEER supports its NRA members/observers in their responsibilities, sharing experience and developing regulatory capacity and best practices. It does so by facilitating expert working group meetings, hosting workshops and events, supporting the development and publication of regulatory papers, and through an in-house Training Academy. Through CEER, European NRAs cooperate and develop common position papers, advice and forward-thinking recommendations to improve the electricity and gas markets for the benefit of consumers and businesses.

In terms of policy, CEER actively promotes an investment friendly, harmonised regulatory environment and the consistent application of existing EU legislation. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable Internal Energy Market in Europe that works in the consumer interest.

Specifically, CEER deals with a range of energy regulatory issues including wholesale and retail markets; consumer issues; distribution networks; smart grids; flexibility; sustainability; and international cooperation.

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More information is available at www.ceer.eu.