



Paris, 7th June 2010.

Dear Sir, Dear Madam,

Please find below the comments of the CLCV relating to the public consultation launched by the European Regulators' Group for Electricity and (ERGEG) on the monitoring of the retail market of energy.

We remain at your disposal for any further information.

Best regards

**Reine-Claude MADER**  
President

Category	No.	Indicator / Measurement	Frequency	Data Source
Customer Satisfaction	1	Customer complaint <i>Number of customer complaints by category</i>	At least annually	Suppliers, DSOs and relevant 3 <sup>rd</sup> party bodies
	2	Customer enquiries <i>Number of customer enquiries by category</i>	At least annually	Suppliers, DSOs and relevant 3 <sup>rd</sup> party bodies
	3	Customer information <i>Is there a reliable price comparison website available for customers</i>	At least annually	NRA research

For the indicator number 3, « Customer information », CLCV considers that it is very important that the website must be easily accessible, provides reliable and comparable information on the suggested prices by the various suppliers present on the market. This piece of information must be updated in real time and controlled: we think that it cannot rely only on declarations.

Customer satisfaction could also be evaluated according to:

- the rate of answers to the complaints of the customers
- the time of treatment of a complaint
- the customer judgment on the quality of the statement: satisfying or not
- the existence or not of a code of good behaviour together with measures of follow-up and control
- the presence or not of ecological indicators (carbon footprint for example)

Category	No.	Indicator / Measurement	Frequency	Data Source
Retail Market Outcomes	4	End-user prices <i>End-user price for typical household customer</i>	At least every quarter, if appropriate and feasible	NRA research / Suppliers
	5	Retail margin <i>Retail margin for typical household customer</i>	At least annually	NRA research / suppliers
	6	Price spread <i>Price spread on comparable products for typical household customer</i>	At least annually	NRA research / suppliers
	7	Diversity of contracts (offers) <i>Number of current offers to typical household customer</i>	At least annually	NRA research/ suppliers
	8	Regulated end-user prices <i>Percentage of customers eligible to receive a regulated end-user price</i> <i>Percentage of eligible customers supplied under regulated end-user prices</i>	At least annually	NRA research / suppliers

The Diversity of contracts (indicator number 7) could also be evaluated according to the taking into account of vulnerable consumers with the presence or not of specific engagements for this profile of consumers.

Concerning the regulated end user prices, CLCV considers that it is important to have a real transparency of the production costs of the historical operator.

Category	No.	Indicator / Measurement	Frequency	Data Source
Market Structure	9	Number of suppliers <i>Number of active suppliers that are selling electricity and/or gas to household customers across the same market</i>	At least annually	NRA
	10	Market concentration <i>Market shares by consumption and/or number of customers</i>	At least annually	Suppliers / DSOs
	11	Branding <i>What percentage of customers is served by a DSO that</i> - <i>has/does not have a separate branding from the supply branch of its vertically integrated undertaking?</i> - <i>is totally separate from the supplier of that customer?</i>	At least annually	NRA customer research

For CLCV, it would be interesting to have information on the cross participations and the economic relations between operators, those being often unintelligible.

Category	No.	Indicator / Measurement	Frequency	Data Source
Market Condition and DSO services	12	Switching rates <i>Number of switches for household customers as a percentage of customer numbers</i>	At least quarterly, if appropriate and feasible	Suppliers / DSOs
	13	Renegotiations <i>Number of renegotiated contracts for household customers</i>	At least annually	Suppliers / DSOs / customer surveys
	14	Delays in switching process <i>Number of delayed switches</i>	At least quarterly, if appropriate and feasible	DSOs
	15	Failure to fulfil the switch <i>Number of failures in relation to the total switching rate</i>	At least quarterly, if appropriate and feasible	Suppliers / DSOs
	16	Connections <i>Average time until connection</i>	At least annually	DSOs
	17	Repairs <i>Average time until repair</i>	At least annually	DSOs
	18	Disconnection rates <i>Relative number of disconnections</i>	At least annually	DSOs
	19	Maintenance services <i>Is there a charge for execution of maintenance services?</i> <i>Average time taken for execution of maintenance services</i> <i>Average charge for execution of maintenance services</i>	At least annually	Relevant maintenance providers

Indicator number 13 « number of renegotiated contracts for household customers » can concern requests from customers to change their profile, their customer category, etc...

The good quality of service could be evaluated by using the following indicators:

- The time of completion of services (connections, repairs, starting dates, cancellation of contracts...)
- The number of annual appointments planned, realized/not respected
- The number of smart meters installed
- The number of requests for interventions for connections, starting of services, repairs
- The number of power failures because of outstanding invoices, problems on the network...
- The number of customers benefiting in their contracts of personalized engagements in case of power failures, tensions failures...
- The number of compensated customers
- The number of clients that are sold door-to-door by alternative operators: CLCV notes more and more aggressive behaviours from salesmen that can be seen as abuses of their weakness. It seems important that these door-to-door sales have to be taken into account and that specific controls are carried out. Today, the Ombudsman can intervene on the contractual problems between operators and consumers and not on those resulting from these door-to-door sales whereas they are becoming numerous.
- Etc...