

**Position Paper of CEZ, a. s.
to the Public Consultation on the Draft
Advice on Customer Complaint Handling,
Reporting and Classification**

CEZ persons responsible	
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I. Introduction

CEZ, a. s. (hereinafter referred to as “CEZ”) welcomes the opportunity given by the ERGEG to all interested parties to comment the text “Draft Advice on Customer Complaint Handling, Reporting and Classification “ within the Public Consultation process.

In this paper, CEZ has given comments to the recommendations published in the text.

II. Specific comments of CEZ

Recommendation 1:

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

Answer: In the case of our company the customers are provided with all necessary contact details.

Recommendation 2:

Customers should be provided by their service provider with the relevant contact information of the relevant third party body in case they want to complain. The most convenient channels for contacting this reference point / dispute settlement body should be proposed, among the following options: address, phone number, website, email, face to face contact point.

Answer: In addition to the info under Recommendation 1 there are other communication channels such as: CEZ webside, customer centeres, printed materials, phone lines... In addition to the above mentioned the position of the ombudsman for customers has recently been created in CEZ.

Recommendation 3:

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

See the answer to Recommendation 2.

Recommendation 4:

Statutory complaint handling standards common to electricity and gas service providers should be in place. NRAs are best placed to set up these standards, after consultation with stakeholders, as appropriate, and to enforce them.

Answer: In our country no such common standards have been established for households. We do not think that NRA would be the best place to set up such standards

Recommendation 5:

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

Answer: Redress schemes are already included in Czech legislation.

Recommendation 6:

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

Answer: No such body has been established in the Czech Republic

Recommendation 7:

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

Answer: If this procedure is in accordance with the Czech legislation, our company does not have problem with it.

Recommendation 8:

A single point of contact should deliver, in every country, free information and advice on consumer issues. Such a single point of contact could deliver, for example, information on: suppliers; different types of supply contracts; price comparisons; consumer rights; and how to complain. When the single point of contact receives complaints, it should be able to direct customers to the relevant body to handle their complaints. This service should be set either by government or the NRA (in some cases in cooperation with other bodies in charge of consumer issues). It should be available either by phone, email, written mail (letter or fax) or in person.

Answer: Governmental agency would in our opinion be the most suitable for providing this service

Recommendation 9:

Before submitting a complaint to a third-party body, customers should first contact their service provider to explain their complaint and try to solve it directly with the provider. Even if the service provider is the first step in the complaint process, customers can naturally ask for information on their rights to an independent body (the single point of contact or an alternative dispute settlement body in case it also deals with information requests), before submitting their complaint to their service provider.

See answer to Recommendation 8.

Recommendation 10:

To get in contact with a third-party body, a wide range of channels should be available, and, in any case, more than one, even if – at a later stage – a written document may be necessary for a formal procedure with alternative dispute settlement bodies.

See answer to Recommendation 8.

Recommendation 11:

Alternative dispute settlement should be made available for all household customers, preferably without charge or as inexpensively as possible irrespective of the financial amount of the dispute.

Answer: Governmental agency seems to be appropriate solution to meet these requirements

Recommendation 12:

Regarding third party bodies, the following complaint handling standards should be effective, in accordance with the above-mentioned Commission Recommendation and with 3rd Package legal provisions:

- *A common classification of complaints should be used, as far as possible;*
- *Written complaint procedures should be determined within third parties, and made available to all customers. These procedures should include the communication of complaint to the service provider(s) before coming to a decision/recommendation;*
- *A prompt first answer or acknowledgement should be issued;*
- *A lead time to solve the complaint/dispute should be determined on a national basis.*

Final recommendations from a third-party body should be issued as soon as possible, and according to a lead time which is proportionate to the level of complexity of the complaint.

See answer to Recommendation 11.

Recommendation 13:

Customers whose complaint has been settled in their favour should be allowed a fair compensation from their service provider.

See answer to Recommendation 5.

Recommendation 14:

When a regulator deems it appropriate to collect data on customer complaints, the regulator should have the possibility to receive the relevant information from third parties as well as from service providers (refer to Recommendation 7).

See answer to Recommendation 7. Nevertheless we have some doubts as to NRA would be the optimum body to deal with (household) customers complaints.

Recommendation 15:

The NRA or another third-party body having responsibility on customer complaints could provide and publish reports on complaints they have received. Depending on the level of maturity of the retail market, the report could include information such as:

- *Categories of complaints which most frequently appear;*
- *Proposals of best practices that could be followed by suppliers in their complaint handling processes;*
- *A list of ADR Board recommendations which have not been followed by service providers, including their names;*
- *A description of the complaint handling process within each service provider.*

The frequency of reporting should be at least once per year.

Answer: We agree if this publication is in accordance with the Czech legislation