

Fostering energy markets, empowering consumers.

# Draft Advice on regulating the quality of distribution services

Focus on connection, disconnection and maintenance – Electricity and Gas

### **A CEER Public Consultation Paper**

Ref: C13-RMF-57-03 03-Dec-2013



#### **INFORMATION PAGE**

#### Abstract

This CEER public consultation document (C13-RMF-57-03) proposes draft Advice from a customer/prosumer perspective on regulating the quality of distribution services, with a focus on connection, disconnection and maintenance.

The draft Advice focuses on services that should be provided to customers either directly by the distribution system operator (DSO) or through the supplier in a supplier centric market model. The draft Advice does not focus on technical requirements.

The document poses a series of questions related to 11 areas of services for electricity, gas and micro generation. CEER invites all interested stakeholders to respond to this public consultation. The deadline for responses is **31 January 2014**. CEER welcomes wider comments on the questions in the comment boxes provided. Input from the consultation and a public hearing will inform CEER's final advice in this area.

#### Target Audience

European Commission, customers, customers with micro generation units (prosumers), suppliers, distribution system operators, energy service companies, network owners, metering operators, National Regulatory Authorities, Member States, academics and other interested parties.

If you have any queries relating to this paper please contact: Ms Natalie McCoy Tel. +32 (0)2 788 73 35 Email: natalie.mccoy@ceer.eu

#### How to respond to this consultation

Deadline: 31/01/2014

This public consultation, launched on 04/12/2013, is carried out through a <u>dedicated online</u> <u>guestionnaire</u> on the European energy regulators website. To participate in the consultation please go to the following link:

#### LINK

All responses, except material marked confidential, will be published on our website <u>www.ceer.eu</u>.



#### **Treatment of Confidential Responses**

In the interest of transparency, CEER

i) will list the names of all respondents (whether confidential or not) or, alternatively, make public the number (but not the names) of confidential responses received;

ii) requests that any respondent requesting confidentiality submits the confidential aspects of their response in a "confidential appendix". CEER will publish all parts of responses that are not marked confidential.

For further information on CEER's rules, see CEER Guidelines on Consultation Practices.

#### **Related Documents**

#### **CEER/ERGEG** documents

- <u>A 2020 Vision for Europe's energy customers. Joint Statement</u>
- <u>ERGEG, Final Guidelines of Good Practice on Regulatory Aspects of Smart Metering for</u> <u>Electricity and Gas. Ref: E10-RMF-29-05. 8 February 2011</u>
- <u>ERGEG, Final Guidelines of Good Practice on Indicators for Retail Market Monitoring for</u> <u>Electricity and Gas. Ref: E10-RMF-27-03. 12 October 2010</u>.
- <u>5<sup>th</sup> CEER benchmarking report on the quality of electricity supply 2011.</u>
- <u>CEER Guidelines of Good Practice on Electricity and gas retail market design, with a focus on supplier switching and billing. Ref: C11-RMF-39-03. 24 January 2012.</u>
- <u>ERGEG Guidelines of Good Practice on Customer Complaint Handling, Reporting and</u> <u>Classification. Ref: E10-CEM-33-05. 10 June 2010</u>

The documents above are available on CEER's website www.ceer.eu

We also have a special area dedicated to <u>customer information</u>.

#### External documents

- Directive 2009/72/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC
- <u>Directive 2009/73/EC of the European Parliament and of the Council of 13 July</u> 2009concerning common rules for the internal market in gas and repealing Directive 2003/54/EC
- Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency



• <u>The functioning of retail electricity markets for European Union customers, Final Report</u> 2010. European Commission Staff Working Paper, Ref SEC(2010) 1409 final.

#### Country documents

France (documents in French)

• Incentive regulation of the quality of service – gas and electricity network operators

Portugal (documents in Portuguese)

- Quality of Service Code for Electricity, for mainland Portugal, the Autonomous Region of Azores and the Autonomous Region of Madeira
- Quality of Service Code for Natural Gas

#### United Kingdom

- Gas transportation. Customers standards of performance
- Standard Licence Condition 15A Guidance Document, 8 September 2010
- <u>Guaranteed Standards of Performance for Electricity Distribution, 2010/2011</u>

#### **Table of Contents**

EXECUTIVE SUMMARY					
1.	INTRODU	UCTION	7		
	1.1. More	e customer/prosumer-focused distribution services	7		
	1.2. Scop	be of the consultation paper	9		
2. SU		IER SERVICES AND DSO PERFORMANCE IN RELATION TO THE	.10		
	2.1. Defir	nition of service standards	.10		
	2.2. Class	sification of service standards	.11		
	2.3. How	to ensure that service standards are met?	.12		
3. RE		ADVICE FROM A CUSTOMER/PROSUMER PERSPECTIVE ON G THE QUALITY OF SERVICES BY THE DSO	.13		
	3.1. New	connection to the grid	.14		
	3.2. Conr	nection of a new customer to the network (minor work)	.20		
	3.3. Activ	ation of energy supply	.23		
	3.4. Time	e taken to disconnect energy supply, after customer request	.24		
	3.5. Warr	ning mechanisms before a disconnection due to non-payment	.26		
		ctivation of energy supply after disconnection due to non-payment			
		ned energy supply interruptions			
	3.8. Infor	mation during un-planned energy supply interruptions	.32		
		mation on services and rights regarding connection and disconnection			
		Customer enquiries concerning connection and disconnection			
	3.11.	Safety and emergency measures	.41		
4. RE		RY OF THE SERVICE AREAS, DEFINITIONS, ISSUES FOR DATION AND RELEVANT SECTORS	.46		
5.	PUBLIC	CONSULTATION AND NEXT STEPS	.48		
AN	NEX 1 – C	EER	.49		
AN	NEX 2 – L	IST OF ABBREVIATIONS	.50		
ANNEX 3 – GLOSSARY OF TERMS51					
	ANNEX 4 - ERGEG GGP ON REGULATORY ASPECTS OF SMART METERING FOR ELECTRICITY AND GAS				
	ANNEX 5 - ERGEG GGP ON CUSTOMER COMPLAINT HANDLING, REPORTING AND CLASSIFICATION				



#### EXECUTIVE SUMMARY

From a customer perspective, connections, disconnections and maintenance are very important processes, as in some cases, they imply the first customer interaction with the energy market. If these processes are well designed and function effectively, they will help to improve customers' perception of the energy market. They are also important for a customer who wants to set up a micro generation unit.

According to the Gas and Electricity Directives in the 3<sup>rd</sup> Package, more precisely *Annex 1, Measures on Consumer Protection*, customers have a right to a contract with their gas/electricity service provider that specifies the services provided, the service quality levels offered, as well as the time for the initial connection and the types of maintenance service offered.

The draft recommendations in this consultation document, on which we ask stakeholders to comment, should be considered in light of the above annex.

The questions asked in this document relate to the quality levels of services provided to customers, particularly in relation to the duration of the connection application process. They do not focus on technical requirements.

Depending on the prevailing market model in different countries, the services covered in the draft recommendations may be executed by a DSO (which is most often the case) or by another market player. Information about the services may be provided directly by the DSO to the customer, or through a supplier. CEER's aim is to ensure that customers have the right to these services (hereafter "distribution services"). In a supplier centric model, the supplier serves as an intermediary between the customer and the DSO. Nevertheless, the DSO may be responsible for executing the services or, for example, providing the supplier with the information needed for their communication with customers.

This public consultation addresses 22 core features of distribution services using open questions with multiple choice answers and space for further comments. These core features are classified into 11 broad services areas, divided into the following sectors: electricity, micro generation and gas. A table with the complete list of services areas and the core features can be found in <u>section 4 of the paper</u>.

The results of the consultation will be presented at a public hearing, which will take place in Q2 2014. Following this public hearing, CEER will develop its final advice, aiming to publish it around mid-2014.



#### 1. Introduction

#### 1.1. More customer/prosumer-focused distribution services

From a customer perspective, connections, disconnections and maintenance are very important processes, as in some cases, they imply the first customer interaction with the energy market. If these processes are well designed and function effectively, they will help to improve customers' perception of the energy market. They are also important for a customer who wants to set up a micro generation unit.

According to the Gas and Electricity Directives in the 3<sup>rd</sup> Package, more precisely *Annex 1, Measures on Consumer Protection*<sup>1</sup>, customers have a right to a contract with their gas/electricity service provider that specifies the services provided, the service quality levels offered, as well as the time for the initial connection and the types of maintenance service offered.

Well-performed services, as well as accessible and understandable customer information, are of key importance. The European Commission 2010 study of retail energy markets<sup>2</sup> found that many customers do not have access to neutral, objective information that empowers them to take an active role in liberalised energy markets. In some cases, information is provided, but customers have trouble getting access to it.

The European Energy regulators work to create well-functioning and competitive EU energy markets so that customers get fair prices, the widest choice of suppliers and the best quality of supply possible. In 2012, CEER placed particular emphasis on customer issues, taking the initiative to build, with customer bodies and other stakeholders, a 2020 vision for Europe's energy customers. The result was a vision presented jointly with BEUC, the EU Consumers' Organisation, to the Citizens' Energy Forum, and endorsed by 16 energy stakeholder bodies<sup>3</sup>. This vision can be characterised by four principles governing the relationship between the energy sector and its variety of customers: reliability, affordability, simplicity, protection and empowerment.

Furthermore, an important call for regulation of customers' rights arises from the new EU legislative measures. Indeed, Directives 2009/72/EC and 2009/73/EC require that Member States shall take appropriate measures to protect final customers, to ensure that they have a right to a contract with their electricity or gas service provider that specifies:

- The services provided, the service quality levels offered, as well as the time for the initial connection;
- Any compensation and the refund arrangements which apply if contracted service quality levels are not met, including inaccurate and delayed billing;

<sup>&</sup>lt;sup>1</sup> Directive 2009/72/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC; Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009concerning common rules for the internal market in gas and repealing Directive 2003/54/EC 2 The a function of the Council of 13 July 2009concerning common rules for the internal market in gas and repealing Directive 2003/54/EC

<sup>&</sup>lt;sup>2</sup> The functioning of retail electricity markets for European Union customers, Final Report 2010. European Commission Staff Working Paper, Ref SEC(2010) 1409 final.

<sup>&</sup>lt;sup>3</sup> <u>A 2020 Vision for Europe's energy customers. Joint Statement</u>



- Information relating to customer rights, including complaint handling and all of the information referred to in this point, clearly communicated through billing or the electricity undertaking's website;
- Benefit from transparent, simple and inexpensive procedures for dealing with their complaints. In particular, all customers shall have the right to a good standard of service and complaint handling by their electricity/gas service provider.

Regarding complaint handling, in 2010 ERGEG issued Guidelines of Good Practice on Customer Complaint Handling, Reporting and Classification<sup>4</sup>. To read the guidelines in short, please see Annex 5.

In this draft Advice, CEER looks into service areas that have not been the focus of previous CEER customer work. CEER carries out Benchmarking reports on electricity – which partly cover customer services - on a regular basis. The most recent of these reports (the CEER 5<sup>th</sup> Benchmarking Report<sup>5</sup>), serves as an important basis for the development of the issues for recommendation used in this document.

These areas concern customer services that are also among the indicators developed by ERGEG in 2010<sup>6</sup>. These services are among the key processes where the customer interacts with stakeholders in the energy market and are a key aspect of reliability and quality of service. The manner in which these services are defined and carried out is an important part of market design. Furthermore, in a status review on NRA monitoring duties, CEER found that very few NRAs monitor or define exactly what these services entail. This draft Advice constitutes a first step towards a harmonised view on which distribution services within connection, disconnection and maintenance would benefit from being defined as well as monitored by NRAs.

In this public consultation document, CEER identifies 22 core features of distribution services which are highly important actions and may represent the first customer interaction with the energy market. If these processes are well designed and function effectively, they can encourage positive customer engagement and result in higher customer trust and greater customer engagement in the market. For this reason, CEER treats these 22 core features as issues for recommendation and asks questions on each of them related to the sector/s they apply to, be it electricity, micro generation and/or gas.

This is a public consultation document. After having received stakeholder comments, CEER will publish its final Advice.

<sup>&</sup>lt;sup>4</sup> This document includes 15 recommendations on complaint handling, as well as a proposal for complaints classification. The whole document can be accessed with the following link: <u>ERGEG Guidelines of Good</u> <u>Practice on Customer Complaint Handling, Reporting and Classification. Ref: E10-CEM-33-05. 10 June 2010</u>

<sup>&</sup>lt;sup>5</sup> 5<sup>th</sup> CEER benchmarking report on the quality of electricity supply 2011.

<sup>&</sup>lt;sup>6</sup> <u>ERGEG, Final Guidelines of Good Practice on Indicators for Retail Market Monitoring for Electricity and Gas,</u> <u>Ref; E10-RMF-27-03, 12 October 2010</u>.



#### **1.2.** Scope of the consultation paper

The aim of this public consultation "Draft Advice on regulating the quality of distribution services" is to develop recommendations on services of high importance for energy customers, related to connection, disconnection and maintenance, which have not previously been covered by CEER.

In this draft Advice, customers are to be understood as household customers and those customers that are deemed to be encompassed by Annex I of the 2009 Electricity/Gas Directives when implementing the 3<sup>rd</sup> Package. Furthermore, customers are also to be understood as micro generation units with a maximum capacity below 50 kW. When an issue for recommendation applies to a micro generation unit, this is clearly stated.

From a customer perspective, network access conditions and timeliness of working connections are usually processes of high priority.

Please note that this draft Advice focuses on the minimum service levels which CEER regards should be provided by DSOs, particularly in relation to the duration of the different processes. It does not focus on technical requirements. The recommendations do not include services such as metering and switching, since they have already been covered by previous CEER documents. Data management is to be presented in a future CEER report, currently under preparation.

Connection to the grid is related mainly to distribution and is therefore strictly related to the regulation of a monopoly activity (although in a few countries this activity can be performed by independent companies, which are also included in the scope of this paper).

Commercial quality is directly linked to the communication between energy companies (either DSOs or suppliers, or both) and customers. It covers not only the energy supply and sale, but also various forms of contacts established between companies and customers.

A glossary of terms has been included in <u>Annex 3</u> of the paper.



### 2. Customer services and DSO performance in relation to the supplier centric model

CEER recommends that the general market model should be supplier centric. Under such a model, the supplier will be the main, but not only, contact for the customer.<sup>7</sup> CEER believes that providing the customer with one main point of contact is convenient and service-oriented, especially as the energy market becomes more complex and the customer has multiple parties to deal with.

In the supplier centric model, the supplier should be the main point of contact for the customer as regards the majority of processes in the energy market, including the switching process and for any questions about billing.

However, the supplier centric model recognises that there are cases when the customer should contact the DSO, for example concerning grid connections and disconnections, although in a few countries these activities can be performed by independent companies.

Depending on the prevailing market model in different countries, the services covered in this paper may be executed by a DSO, a supplier or another market player. The aim of CEER is to ensure that customers have the right to these services, no matter which market player performs the tasks. In a supplier centric model, the supplier serves as an intermediary between the customer and the DSO. Nevertheless, the DSO may be responsible for executing the services or, for example, providing the supplier with the information needed for their communication with customers.

The appointed single point of contact<sup>8</sup> should be able to provide information on and contact details of the market player responsible for distribution services as well as other customer related issues.

#### 2.1. Definition of service standards

CEER periodically surveys and analyses the quality of electricity supply in its member countries. These surveys and analyses are presented in CEER Benchmarking Reports on Quality of Electricity Supply. The service standards for distribution services are used by most EU countries, hence the Benchmarking Report recognises this term. Service standards are defined at national level.

For the purpose of this draft Advice, CEER uses as a reference (among others) the results of the last Benchmarking Report, CEER's 5<sup>th</sup> Benchmarking Report, being fully aware that this report only covers electricity.

<sup>&</sup>lt;sup>7</sup> Electricity and Gas Retail market design, with a focus on supplier switching and billing. Guidelines of Good Practice. Ref: C11-RMF-39

<sup>&</sup>lt;sup>8</sup> Article 3 (12) in Directive 2009/72/EC and Article 3 (9) in Directive 2009/73/EC.



CEER finds that the service standards for connections and disconnections of gas and electricity supply can be treated in a similar way, so the recommendations proposed below are essentially the same for both gas and electricity. This document includes also service standards for the connection of micro generation.

In CEER's 5<sup>th</sup>Benchmarking Report, it was observed that many quality indicators related to connection and disconnection were only superficially defined. Differences in legal provisions or practice showed that standards (see below for explanation) need to be defined in precise terms and supported with explanations and exceptions. The indicator "time from the notice to pay until disconnection" used in the CEER's 5<sup>th</sup> Benchmarking Report can be used here as an example. The standard should precisely define the initial trigger and define the closing event. Otherwise, there could be questions like: does this standard imply time counted from when the notice is sent or from the receipt of notice?

If distribution services, or service standards, are based on precise definitions, including the obligations of all market players responsible in the process, they will be easier to understand for all, not least the customer.

#### 2.2. Classification of service standards

The most frequent commercial quality aspect regarding connections and disconnections is the timeliness of services requested by customers. There are two main types of requirements for commercial quality standards:

**Guaranteed Standards** (GSs) refer to service quality levels which must be met in each individual case, so it will apply to 100% of the cases (the company's performance towards the customer). Minimum quality levels are oriented to the protection of customers, and can be combined with compensations in case of non-fulfillment.

The definition of GSs includes the following features:

- Performance covered by the standards (e.g. estimation of the costs for connection);
- Maximum time before execution of the performance commonly determined in terms of response (fulfillment) time (e.g. 5 working days);

**Overall Standards** (OSs) refer to service quality levels that must be met (for a given service), taking into account the whole activity of the company in a period of time. The Overall Standards are then, by their nature, not directly customer oriented since they do not apply to all customers but a percentage of the customers over a time.

The definition of OSs includes the following features, calculated as a percentage or as an average level of performance:

- Performance covered (e.g. connection of a new customer to the network);
- Minimum level of performance (commonly in % of cases), which has to be met in a given period (e.g. 90% of new customers have to be connected to the distribution network within 20 working days).
- Average level of performance, which allows for monitoring of the company performance levels, and can be used to promote improvement though incentive / penalty schemes.



#### 2.3. How to ensure that service standards are met?

The countries implement service standards in a variety of ways, for example through:

- the regulation of the distribution activity;
- DSO licence conditions;
- general terms and conditions (contracts); and
- incentive regulation.

In some cases, if the DSO fails to provide the level of service required by the standards, the customer is entitled to receive a compensation payment, subject to certain exemptions. This compensation can be paid automatically or upon request. Compensations may not apply in some cases, e.g., when the information provided by the customer is incorrect or incomplete, or when the DSO is not able to gain access to customer' premises.

Another possible way to ensure that regulated monopolistic companies deliver a sufficient level of service quality is the use of incentive regulation (reward or penalty) on their revenues, based on performance against the service standards. In addition, it is possible to impose sanctions when information and measurement on a particular parameter makes it possible.

The publication of performance and quality service indicators can furthermore be used as a tool for making the DSO activities more visible, as well as a trigger and an incentive to improve service performance.

CEER's customer recommendations should always be considered as being applicable to all customers, not a limited number of customers. Each customer has the right to understand his/her individual rights and possibilities.

Annex 3 provides a glossary of the key terms used in this report, including definitions for new connection to the grid, major and minor work, connection of a new customer and activation/disconnection of energy supply.



### 3. Draft Advice from a customer/prosumer perspective on regulating the quality of services by the DSO

This chapter identifies 22 core features of distribution services which have been categorised under 11 service areas, presented in a process flow:

- New connection to the grid
- Connection of a new customer to the network
- Activation of energy supply
- Disconnection of energy supply, after customer request
- Warning mechanisms before disconnection due to non-payment
- Reactivation of energy supply after disconnection due to non-payment
- Planned energy interruptions
- Information during un-planned energy interruption
- Information on services and rights regarding connection and disconnection
- Customer enquiries concerning connection and disconnection
- Safety and emergency measures

CEER treats these 22 core features as issues for recommendation and asks open questions on each of them. The issues for recommendation are divided into electricity (E), micro generation units (MG) and gas (G) in order to reflect possible differences between the different sectors. Example: 1/E, 1/MG and 1/G.

Most national gas and electricity legal frameworks have service standards regarding connections. Connection-related activities have a complex structure. Nevertheless, the services presented in this paper represent the whole process for connection, disconnection and maintenance.

An important difference between electricity and gas in the EU 3<sup>rd</sup> Package is that all *electricity* household customers enjoy universal service<sup>9</sup>, that means the right to be supplied with electricity of a specified quality within their territory at reasonable, easily and clearly comparable, transparent and non-discriminatory prices.

Article 37.6 of Directive 2009/72/EC (Electricity Directive) states that the regulatory authorities shall be responsible for approving the terms and conditions for connection and access to national networks, including transmission and distribution tariffs or their methodologies.

The goal of the electricity universal service is to provide a baseline level of services to every resident of a country, including those in low income, rural, insular, and high cost areas, at rates that are reasonably comparable to those charged in urban areas.

<sup>&</sup>lt;sup>9</sup> Electricity Directive 2009/72/EC; art 3.3.



However, it is important to note that the supply of natural gas is not defined by the Gas Directive in the 3<sup>rd</sup> Package as a universal service. It reflects the fact that the population covered by the natural gas network varies a lot in Europe, from more than 70% of dwellings in some countries (e.g. the Netherlands and Italy), to 20-40% in others (e.g. Spain and France) or even below 10% (e.g. Greece). For the same reason, the Gas Directive does not include the obligation to connect gas customers to the natural gas network.

Despite this important difference, CEER finds that the service standards for connections and disconnections of gas and electricity supply can be treated in a similar way, therefore the services identified in this document are essentially the same for both gas and electricity.

#### 3.1. New connection to the grid

New connection to the grid includes the following core features:

Time taken to respond to customer request	Issue for recommendation 1 (E, MG, G)
Content of the response	Issue for recommendation 2 (E, MG, G)
Time taken to provide the price offer	Issue for recommendation 3 (E, MG, G)
Time taken to initiate the connection	Issue for recommendation 4 (E, MG, G)

A new connection to the grid is mainly related to distribution and is therefore strictly related to the regulation of a monopoly activity, although in a few countries this activity can be performed by independent companies.

From a customer perspective, the network access conditions and timeliness of working connections are of high priority.

#### • Time taken to respond to customer request for a new connection to the grid

The time taken to respond to a customer application for a new connection to the grid is considered as the time period between the receipt of customer's request (be it written, by e-mail, phone etc.) for connection and the written (by mail, e-mail) response of the DSO (date of dispatch).

#### Reference to CEER's 5<sup>th</sup>Benchmarking Report

The time response to a customer application for a network connection is commonly used in electricity as a standard for 12 countries. In those countries, the median value of time for response to a customer application it is around 16 days, with a range between 8 and 30 days. The countries that are under or in the average are Austria, Great Britain, Hungary, Slovenia, Spain and Latvia. In 6 countries (Great Britain, Czech Republic, Hungary, Spain, and Slovenia), the time for response of this service has to be met in 100% of cases.

In the case of an application for connection to the gas grid, as this is not a universal service, the first step is to check whether or not the customer premises are inside the area covered by the natural gas distribution network.



<u>Issue for recommendation 1/E:</u> The time taken to respond to a customer request for a new electricity connection to the grid (major work) should not exceed:



two days one week



two weeks

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 1/MG:</u> The time taken to respond to a micro generation unit request for a new electricity connection to the grid (major work) should not exceed:

two days
one week
two weeks
other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 1/G:</u> The time taken to respond to a customer request for a new gas connection to the grid (major work) should not exceed:

two days

one week

two weeks

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 2/E</u>: The content of the response to a customer request for a new electricity connection to the grid should, as a minimum, inform on:





the steps of the process and the estimated time schedule

requests for data needed by the DSO from the customer

other information, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 2/MG</u>: The content of the response to a micro generation unit request for a new electricity connection to the grid should, as a minimum, inform on:



the steps of the process and the estimated time schedule

requests for data needed by the DSO from the customer



other information, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 2/G:</u> The content of the response to a customer request for a new gas connection to the grid should, as a minimum, inform on:

the steps of the process and the estimated time schedule requests for data needed by the DSO from the customer



other information, please specify below

Comments, if any (maximum 100 words):



### • Time taken to provide the detailed estimated price offer of the new connection to the grid

The time taken to provide the price offer for a new connection to the grid (major work) is considered as the time period between the receipt of the customer's relevant data needed for the DSO to execute a new connection to the grid and the written response of the DSO, including a detailed estimated price offer for the connection. For electricity, this also encompasses micro generation units.

#### Reference to the Energy Efficiency Directive:

Annex XII: Transmission system operators and distribution system operators shall provide any new producer of electricity produced from high-efficiency cogeneration wishing to be connected to the system with the comprehensive and necessary information required, including:

(i) a comprehensive and detailed estimate of the costs associated with the connection;

(ii) a reasonable and precise timetable for receiving and processing the request for grid connection;

(iii) a reasonable indicative timetable for any proposed grid connection. The overall process to become connected to the grid should be no longer than 24 months, bearing in mind what is reasonably practicable and non-discriminatory.

#### Reference to CEER's 5<sup>th</sup>Benchmarking Report:

The time to provide cost estimations for network connection is commonly used in electricity as a quality standard for 14 countries. In those countries, the median value to provide cost estimation it is around 14 days, with a range between 5 and 35 days if no intervention is necessary in the public network. The countries that are below or at the average are Hungary, Spain, Austria, France, Great Britain, Greece, Italy, the Netherlands and Slovenia. In three countries (Austria, Estonia and Portugal), the time to provide this service has to be met in 90% of cases. In five countries (France, Hungary, Ireland, Italy and Spain), it has to be met in 100% of cases.

<u>Issue for recommendation 3/E</u>: The detailed estimated price offer for a new electricity network connection should be provided to the customer within:

- one week
  two weeks
  three weeks
- Н

other time period, please specify below

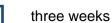
Comments, if any (maximum 100 words):



<u>Issue for recommendation 3/MG:</u> The detailed estimated price offer for a new electricity network connection to a micro generation unit should be provided to the customer within:



one week two weeks



other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 3/G:</u> The detailed estimated price offer for a new gas network connection should be provided to the customer within:

one week
two weeks
three weeks
other time period, please specify below

Comments, if any (maximum 100 words):

CEER recognises that in some countries these offers are set by tariffs, and therefore not negotiable.

CEER recognises that in some countries the customers have the right to appeal (according to national law) the price offer if he/she finds it unreasonable.

CEER finds it important that once the customer has received the detailed estimated price offer and accepted the DSO to start the work, the customer should not need to wait too long for the physical connection work to start.

<u>Issue for recommendation 4/E:</u> Once the customer has received the detailed estimated price offer and accepted to start the work, the physical electricity connection work should, unless a later start date is requested by the customer, be initiated within:



one month

two months



three months

other time period, please specify below

Comments, if any (maximum 100 words):

Issue for recommendation 4/MG: Once the responsible party for the micro generation unit has received the detailed estimated price offer and accepted to start the work, the physical electricity connection work should, unless a later start date is requested by the customer, be initiated within:



one month



two months

three months

other time period, please specify below

Comments, if any (maximum 100 words):

Issue for recommendation 4/G: Once the customer has received the detailed estimated price offer and accepted to start the work, the physical gas connection work should, unless a later start date is requested by the customer, be initiated within:



one month

two months

three months

other time period, please specify below

Comments, if any (maximum 100 words):



#### 3.2. Connection of a new customer to the network (minor work)

Connection of a new customer to the network includes the following draft recommendations:

Time taken to provide the price offer	Issue for recommendation 5 (E, MG, G)
Time taken to connect	Issue for recommendation 6 (E, MG, G)

These recommendations apply to connections where gas, electricity or a micro generation unit is already installed at the customers' premises. Meters are already installed, except for a small number of cases. It excludes connections needing grid extension.

### • Time taken to provide the detailed estimated price offer for connecting a new customer to the network (minor work)

The time taken to provide the detailed estimated price offer for a connection of a new customer to the network is considered as the time period between the receipt of customer's relevant data needed for the DSO to execute the connection and the written response of the DSO including a price offer for the connection.

#### Reference to CEER's 5<sup>th</sup>Benchmarking Report:

The time to facilitate cost estimations for network connection is commonly used in electricity as a quality standard for 14 countries. In those countries, the median value to provide cost estimation it is around 14 days, with a range between 5 and 35 days if no intervention is necessary in the public network. The countries that are under average or in the average are Hungary, Spain, Austria, France, Great Britain, Greece, Italy, the Netherlands and Slovenia. In three countries (Austria, Estonia and Portugal), the time to provide this service has to be met in 90% of cases. In five countries (France, Hungary, Ireland, Italy and Spain) it has to be met in 100% of cases. The average time for cost estimation for minor work does not exceed 10 days in the majority of countries and shows a decreasing trend between 2008 and 2010.

<u>Issue for recommendation 5/E:</u> The detailed estimated price offer for connecting a new customer to the electricity network (minor work) should be provided to the customer within:

one week



two weeks three weeks

other time period, please specify below

Comments, if any (maximum 100 words):



<u>Issue for recommendation 5/MG:</u> The detailed estimated price offer for connecting a new micro generation unit to the electricity network (minor work) should be provided to the relevant party within:

one week two weeks

three weeks

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 5/G:</u> The detailed estimated price offer for connecting a new customer to the gas network (minor work) should be provided to the customer within:

one week
two weeks
three weeks
other time period, please specifybelow

Comments, if any (maximum 100 words):

#### • Time taken to connect a new customer to the network (minor work)

The time taken to connect a new customer to the network is the time period between the receipt by the DSO of the of customer's request for connection, including, when applicable, the acceptance of the connection price, and the date when the customer is connected to network. Time needed for administrative authorisation obviously has to be respected.

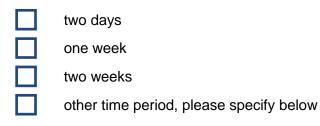
According to the 3<sup>rd</sup> Package, *Annex 1, Measures on Consumer Protection,* electricity and gas customers have a right to a contract with their gas/electricity service provider that specifies the services provided, the service quality levels offered, as well as the time for the initial connection.

Reference to CEER's 5<sup>th</sup>Benchmarking Report:



The time taken to connect new customers to the network is commonly used in electricity as a quality standard for 16 countries. In those countries, the median value to connect new customer it is around 11 days, with a range between 2 working days and 18 weeks. The vast majority of countries meet this average. In two countries (Austria, and Latvia), the time to connect new customers for this service has to be met in 90% of cases.In seven countries (Czech Republic, Great Britain, Hungary, Ireland, Italy, Portugal and Spain), it has to be met in 100% of cases.

<u>Issue for recommendation 6/E:</u> The time taken to connect a new customer to the electricity network (minor work) should, unless a longer time period is requested by the customer, not exceed:



Comments, if any (maximum 100 words):

<u>Issue for recommendation 6/MG:</u> The time taken to connect a new micro generation unit to the electricity network (minor work) should, unless a longer time period is requested by the customer, not exceed:

two days

one week two weeks

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 6/G:</u> The time taken to connect a new customer to the gas network (minor work) should, unless a longer time period is requested by the customer, not exceed:



two days

one week



two weeks





other time period, please specify below

Comments, if any (maximum 100 words):

#### 3.3. Activation of energy supply

Activation of energy supply includes the following draft recommendation:

Time taken to activate energy supply

Issue for recommendation 7 (E, G, MG)

Activation of energy supply is the action of starting the delivery of energy to a point of supply. To request the activation of energy supply, the customer needs to have a previous agreement with a supplier (a gas or electricity supply contract). Thus, in most countries, the market player who contacts the DSO for the service activation is the supplier.

#### • Time taken to activate an energy supply (when the connection is already done)

The time taken to activate an energy supply (when the connection is already done) is the time period between the receipt by the DSO of the request for activation (from the supplier or the customer) and the date of activation of the energy supply at the customer' premises.

In some countries, before the activation of the energy supply, it is necessary that the customer installation pass an inspection or a security check that can be performed by the DSO or by other authorised market player.

In particular for gas supply, a security check at the moment of activation of supply (usually made by the DSO) is prescriptive in many countries to avoid gas leaks at the customer gas installation. If the result of the inspection is negative, the DSO should not proceed to activation until the problem is resolved.

As connection and activation activities are closely interrelated, in some countries the process for these services are identical or they do not distinguish among connection service and activation service.

Advanced smart meters with the functionality of remote communication can accelerate the time taken to activate an electricity supply. This would allow information to be sent and collected directly from the meter, and the meter to be activated or deactivated remotely by the DSO.

<u>Issue for recommendation 7/E:</u> The time taken to activate electricity supply (when the physical connection is already in place) should, unless a longer time period is requested by the customer, not exceed:



one day



. .

two days

one week

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 7/MG:</u> The time taken to activate electricity supply (when the physical connection is already in place) to a micro generation unit should, unless longer a time period is requested by the customer, not exceed:

Ì	

one day two days

one week

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 7/G:</u> The time taken to activate gas supply (when the physical connection is already in place) should, unless a longer time period is requested by the customer, not exceed:

one daytwo daysone week

other time period, please specify below

Comments, if any (maximum 100 words):

#### 3.4. Time taken to disconnect energy supply, after customer request

Disconnection of energy supply, after customer request, includes the following recommendation:



Time taken to disconnect energy supply after customer request

Issue for recommendation 8 (E, MG, G)

Disconnection is defined as the action of interrupting delivery of energy supply to a point of supply. The issue for recommendation below refers to a situation where the disconnection is requested by the customer.

#### • Time taken to disconnect after customer request

Time taken to disconnect after customer request is the time period between the receipt of the customer's written (mail, e-mail) request for disconnection and the date the customer is disconnected.

#### Reference to CEER's 5<sup>th</sup>Benchmarking Report

The time response to customer application for disconnection is commonly used in electricity as a quality standard for 8 countries. In those countries, the median value for the service disconnections is around 5 working days, with a range between 5 and 8 days. The countries that are below or at the average are France, Ireland, Italy, and Latvia. In four countries (France, Ireland, Italy and Latvia), the disconnection time has to be met in 100% of cases.

<u>Issue for recommendation 8/E:</u> The time taken to disconnect a customer after a customer request should, unless a longer time period is requested by the customer, not exceed:

one day
two days
one week
other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 8/MG:</u> The time taken to disconnect a micro generation unit after a customer request should, unless a longer time period is requested by the customer, not exceed:

one day two days

H

one week

other time period, please specify below

Comments, if any (maximum 100 words):



<u>Issue for recommendation 8/G:</u> The time taken to disconnect a customer after a customer request should, unless a longer time period is requested by the customer, not exceed:

one day
two days
one week
other time period, please specify below

Comments, if any (maximum 100 words):

#### 3.5. Warning mechanisms before a disconnection due to non-payment

Warning mechanisms before a disconnection due to non-payment include the following recommendation:

Time between last notice to pay and Issue for recommendation 9 (E, G) disconnection

A minimum time from notice to pay to disconnection due to non-payment is commonly used as a protection measure to the customers.

In most CEER countries, a disconnection of energy supply to a point of supply can be requested by the supplier in case of non-payment of the energy bill by the customer. In some countries, this action can also be initiated by the DSO (non-payment of access tariffs in countries with two–bill model or in case of frauds, or in a situation with two-contract models). Apart from a few exceptions, all CEER member countries have warning mechanisms in place in order to allow for sufficient time and notification before disconnections can take place.

#### Reference to CEER's 5<sup>th</sup>Benchmarking Report:

Many CEER member countries have a defined procedure which stipulates the amount and frequency of warnings that need to be delivered before a disconnection can take place. Most countries stated that this measure applied to all household customers at a minimum, if not all customers. The time from notice to pay before disconnection is commonly used in electricity as a quality standard for 6 countries. In those countries, the median value for notice to pay before disconnection it is around 15 days, with a range between 8 and 28 days. In one country (Austria) the time for notice to pay before disconnection has to be met in 90% of cases. And in one country (Slovenia) has to be met in 100% of case.



CEER recognises that in the gas sector, the picture is largely the same as in the electricity sector.

Further, the CEER Status Review of Customer and Retail Market Provisions from the 3<sup>rd</sup> Package reported that in addition to such warning procedures, an important number of countries reported to have measures in place which prohibit the disconnection of gas/electricity to vulnerable customers at critical times, particularly in winter months<sup>10</sup>. CEER members typically mentioned certain conditions under which the prohibition of disconnection applies. Some of the most frequently mentioned groups that benefit from a general prohibition of disconnection are people with life threatening illnesses, hospitals or other specific population groups that are deemed particularly vulnerable (e.g. mostly elderly persons, households with children, cases in which there is a danger of severe property damage or residential customers dropped by their supplier).

#### • Time between last notice to pay and disconnection due to non-payment

After a missed payment, customers should receive a last notice to pay, including the expected date of disconnection in case of non-payment before that date. The draft recommendation covers the minimum time period between the customers' receipt of the last notice to pay and the disconnection.

Some countries may have additional measures in place which prohibit disconnection of the gas/electricity of vulnerable customers at critical times, particularly in winter months. The draft recommendation below is naturally not applicable in those cases.

<u>Issue for recommendation 9/E:</u> In case of non-payment of electricity bill, customers should as a warning mechanism receive a last notice to pay, including the expected date of disconnection, at least:

three weeks before disconnection date

four weeks before disconnection date

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 9/G:</u> In case of non-payment of gas bill, customers should as a warning mechanism receive a last notice to pay, including the expected date of disconnection, at least:

<sup>&</sup>lt;sup>10</sup> According to the Directive 2009/72/EC, Art 3(7) and 2009/73, Art 3(3), Each Member State shall define the concept of vulnerable customers which may refer to energy poverty and, inter alia, to the prohibition of disconnection of electricity [gas] to such customers in critical times. Member States shall ensure that rights and obligations linked to vulnerable customers are applied.





three weeks before disconnection date four weeks before disconnection date

other time period, please specify below

Comments, if any (maximum 100 words):

#### 3.6. Reactivation of energy supply after disconnection due to non-payment

Reactivation of energy supply after disconnection due to non-payment includes the following recommendations:

Time taken to reactivate after disconnection Issue for recommendation 10 (E, G) due to non-payment (no new meter installed)

Time taken to reactivate after disconnection due to non-payment when new meter installed Issue for recommendation 11 (E, G)

#### • Time taken to reactivate energy supply after a disconnection due to nonpayment

The time taken to reactivate energy supply following a disconnection due to non-payment is the time period between the notice of customer debt payment (after a disconnection due to non-payment) and the reactivation of the energy supply to the customer.

In most countries, customers who have settled their debts and paid all pending fees after a disconnection due to non-payment can request to be reconnected to the gas or electricity network as soon as possible.

Reference to CEER's 5<sup>th</sup> Benchmarking Report:

The time for reactivation of electricity supply after disconnection due to non-payment is commonly used in electricity as a quality standard for 11 countries. In those countries, the median value for restoration after disconnection has a range between 1 and 8 working days. In two countries (Austria and Sweden) the time for restoration of electricity has to be met in 90% of cases. And in 4 countries (Czech Republic, Portugal, Hungary and Italy) it has to be met in 100% of cases.

This is one of the most prevalently used indicators with a small (short) expected value. Some countries may install prepayment meters for customers after non-payment which will require more time to perform the reactivation of supply. Hence, we present two issues for recommendation below.



Issue for recommendation 10/E: Except in cases where new meters are to be installed, the time taken to reactivate the electricity supply after a disconnection due to non-payment should not exceed:



one day

two days

other time period, please specify below

Comments, if any (maximum 100 words):

Issue for recommendation 10/G: Except in cases where new meters are to be installed, the time taken to reactivate the gas supply after a disconnection due to non-payment should not exceed:

one day
two days
other time pe

other time period, please specify below

Comments, if any (maximum 100 words):

Issue for recommendation 11/E: When new meters are to be installed, the time taken to reactivate the electricity supply after a disconnection due to non-payment should not exceed:

one day

two days

three days

other time period, please specify below

Comments, if any (maximum 100 words):

Issue for recommendation 11/G: When new meters are to be installed, the time taken to reactivate the gas supply after a disconnection due to non-payment should not exceed:



one day

Ref: C13-RMF-57-03 Draft advice on regulating the quality of distribution services

two days

three days

other time period, please specify below

Comments, if any (maximum 100 words):

#### 3.7. Planned energy supply interruptions

Planned energy supply interruptions include the following recommendations:

Time of notification in case of planned	Issue for recommendation 12 (E, G)
interruption	
Duration of a planned interruption	Issue for recommendation 13 (E, G)

When the DSO carries out planned maintenance work it may need from time to time to interrupt the energy supply. In the case of a planned interruption, the DSO should provide customers with advance information on the date of the planned interruption, the expected duration of the interruption and the reason why supply needs to be interrupted.

It should be noted that quality levels regarding continuity of energy supply (which may include compensations to affected customers for unplanned interruptions) are not treated in this document.

The effect of planned interruptions on customers varies depending on the type of customer, time the interruption takes place, interruption duration, frequency of occurrence, and customer's geographic location etc.

The aim of notifying a customer about an interruption in advance is to give the customer the possibility to implement proper measures in order to reduce the negative consequences of the interruption of the supply.

#### Reference to CEER's 5<sup>th</sup>Benchmarking Report:

The time for giving information in advance is commonly used in electricity as a quality standard for 13 countries. In those countries, the median value for give customer information is around 2 days, with a range between 1 and 15 days. Hungary and Check Republic are above the average, with a 15-day notification requirement. Countries that are under average or at the average are Austria, Estonia, Finland, The Netherlands, Slovenia and Spain. In five countries (Great Britain, Hungary, Ireland, Slovenia and Spain) for giving information this service has to be met in 100% of cases. Some countries have placed additional obligations on vulnerable customers in the event of planned interruptions, like the need to provide alternate heating facilities (UK).



#### Time of notification of planned supply interruptions •

The time of notification of planned supply interruption is the time period between the customer's receipt of the notice of a planned interruption and the beginning of the planned interruption.

Issue for recommendation 12/E: In case of planned electricity supply interruptions, the customer should be notified at least:

one week in advance two weeks in advance one month in advance other time period, please specify below

Comments, if any (maximum 100 words):

Issue for recommendation 12/G: In case of planned gas supply interruptions, the customer shall be notified at least:

one week in advance

two weeks in advance

one month in advance

other time period, please specify below

Comments, if any (maximum 100 words):

#### Duration limit of a planned supply interruption

The duration limit of a planned supply interruption is the time period between the interruption of supply and the reactivation of supply.

When the DSO executes planned supply interruptions, the maintenance work should be completed as fast and efficiently as possible, thus avoiding a long duration of the interruption for the customers.

Issue for recommendation 13/E: The duration limit of a planned electricity supply interruption should not exceed:



6	
1	
С	

6 hours

12 hours

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 13/G:</u> The duration limit of a planned gas supply interruption should not exceed:

6 hours 12 hours

other time period, please specify below

Comments, if any (maximum 100 words):

#### 3.8. Information during un-planned energy supply interruptions

Information during un-planned energy supply interruptions includes the following issues for recommendation:

Customer information in case of un-planned Issue for recommendation 14 (E, G) interruption

An un-planned interruption is an interruption that occurs when the customer has not been informed in advance.

In general, unplanned interruptions are concerned with the continuity of supply. This is a key aspect of quality parameters. When a supply disturbance occurs, the DSO has to work to rectify the problem as soon as possible, and the customer should be informed of the estimated duration of the interruption through a variety of channels (e.g. telephone services and web page).

This paper does not incorporate technical aspects or quality parameters about continuity of supply. However, the customer information that a DSO should provide during and after an unplanned energy supply interruption is an important aspect of commercial quality.

ERGEG has previously issued a recommendation applicable for electricity, in relation to this, as follows.



Reference to ERGEGs GGP on Regulatory Aspects of Smart Metering for Electricity and Gas:

Recommendation E 10. Alert in case of non-notified interruption: If a customer so chooses, he/she can receive immediate information on non-notified energy interruptions at his/her connection point (e.g. by sms), and thus act upon it. This will help minimise the extent of the damage resulting from an outage when the customer is away from the home. This information will also help the customer when claiming for reimbursement because of outages. This information could be subject to a reasonable fee.

The issue for recommendation below can be regarded as a second step in relation to the ERGEG recommendation above. After the immediate alert, the customer should be able to receive information on the estimated duration of the interruption.

### • Time taken to provide customer information during an un-planned supply interruption

The time taken to provide customer information during an un-planned supply interruption is the time period between the start of the supply interruption and the availability of the information for the customer.

<u>Issue for recommendation 14/E:</u> In case of non-notified interruption of electricity supply, the customer should receive information on when the DSO estimates that the supply will be reactivated. This information should be made available to the customer through a variety of channels, not least the web. This information should be made available to the customer:

	-
1	

within three hours

within five hours

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 14/G:</u> In case of a non-notified gas supply interruption, the customer should have access to the information on when the DSO estimates that the supply will be reactivated. This information should be made available to the customer through a variety of channels, not least the web. This information should be made available to the customer:



within three hours

within five hours

other time period, please specify below



Comments, if any (maximum 100 words):

### 3.9. Information on services and rights regarding connection and disconnection

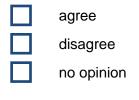
Providing customers with information about distribution services and customer rights includes the following issues for recommendation:

Customer information on rights concerning connection and disconnection	Issue for recommendation 15 (E, MG, G)
Punctuality of customer appointments	Issue for recommendation 16 (E, MG, G)
Communication interface	Issue for recommendation 17 (E, MG, G)

## • Clear, user-friendly and comprehensible customer information should be made available concerning the procedure to contract distribution services and customer rights regarding connection and disconnection.

The European Commission 2010 study on retail energy markets<sup>11</sup> found that many customers are poorly informed about the energy market. Having a single point of contact<sup>12</sup> and providing neutral and objective information about the procedure to contract distribution services is therefore important. It may also be reasonable that each DSO itself provides customer information regarding distribution services on connection and disconnection, and customers rights related to those services. This information may be communicated through several means.

<u>Issue for recommendation 15/E</u>: The DSO should provide customers with information regarding connection, disconnection, and customer rights related to these. This information should be presented in a clear, user-friendly and comprehensible way:



<sup>&</sup>lt;sup>11</sup> The functioning of retail electricity markets for European Union customers, Final Report 2010. European Commission Staff Working Paper, Ref SEC(2010) 1409 final.

<sup>&</sup>lt;sup>12</sup> DIRECTIVE 2009/72/EC, Art. 3 par. 12: "Member States shall ensure the provision of single points of contact to provide consumers with all necessary information concerning their rights, current legislation and the means of dispute settlement available to them in the event of a dispute. Such contact points may be part of general consumer information points."



Comments, if any (maximum 100 words):

<u>Issue for recommendation 15/MG:</u> The DSO should provide customers with information regarding connection, disconnection and customer rights related to these. This information should be presented in a clear, user-friendly and comprehensible way:

	Ľ
	Ľ

agree disagree

no opinion

Comments, if any (maximum 100 words):

<u>Issue for recommendation 15/G:</u> The DSO should provide customers with information regarding connection, disconnection and customer rights related to these. This information should be presented in a clear, user-friendly and comprehensible way:

disagree

agree



Comments, if any (maximum 100 words):

Punctuality of appointments with customers

An appointment can be considered on time (punctual) when the personnel of the DSO arrives at the customer site within the time range (period of hours) previously agreed with the customer. The time range does not include the duration of the works.

Appointments with customers are a very important issue for connections and disconnections of energy supply. Some operations (for example, access to the premises) require the presence of the customer. The DSO must offer, and keep to, a timed appointment, proactively or when requested by the customer. Regulators can impose standards (mainly for DSOs) in order to ensure the punctuality of appointments with customers.

*Reference to CEER's 5<sup>th</sup>Benchmarking Report* 



The punctuality of appointments with customers is commonly used in electricity as a quality standard for 11 countries. In those countries, the median value for the punctuality it is around 2.5 hours, with a range between 0.5 and 4 hours. The countries that are below or at the average are Czech Republic, Estonia, Italy, The Netherlands and Portugal. In six countries (Czech Republic, France, Great Britain, Hungary, Ireland Italy and Portugal) the punctuality of appointments has to be ensured in 100% of cases. In some countries (UK) the punctuality of appointments is measured by a customer satisfaction survey, a complaint metric and considers how well distribution companies have engaged with their stakeholders.

<u>Issue for recommendation 16/E:</u> For electricity appointments with the customer for an onsite intervention, the time frame within which the DSO should arrive onsite should be fixed in advance and should not exceed:

four hours

two hours

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 16/MG:</u> For appointments with the micro unit customer for an onsite intervention, the time frame within which the DSO should arrive onsite should be fixed in advance and should not exceed:

	_	
_		i.

two hours

four hours

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 16/G:</u> For gas appointments with the customer for an onsite intervention, the time frame within which the DSO should arrive onsite should be fixed in advance and should not exceed:

two hours

four hours

other time period, please specify below

Comments, if any (maximum 100 words):



### • Communication interface with customers

The management of customer relations requires a good communication interface between the supplier and the DSO in a supplier centric model, and the customer and the DSO in a non-supplier centric model.

When referring to call centers, different parameters can be used to measure quality and availability:

- <u>Availability of a call center</u>. Number of daily/weekly/annual hours of availability of a call center.
- <u>Number of abandoned calls/total calls received</u>. An abandoned call is a call initiated to a call center that is ended before any conversation occurs.
- Number of calls answered/number of calls received.
- <u>Longest delay in queue</u> is the longest time period that a customer in a queue waits before either connecting with an agent or hanging up.
- <u>Average handle time</u> is the average duration of one transaction, typically measured from the customer's initiation of the call and including any hold time, talk time and related tasks that follow the transaction.

### *Reference to CEER's 5<sup>th</sup>Benchmarking Report*

The most developed area for standards traditionally relates to answering customer letters (contacts in writing). In addition, in some countries the customer contact between suppliers or DSOs and customers implies customer service through call centres (the number of which is considerably higher than that of the contacts in writing) and customer personal visits to customer centres. The latter is expected to be the highest quality level service. Some examples: France monitors the ratio of number of calls answered/number of calls received as a quality indicator for distribution services. Portugal DSOs have overall standard for phone calls to call centres and visits to customer centers with a maximum waiting time (60 seconds for call centres and 20 minutes for customer centres). In the UK, the number of unsuccessful calls each DNO receives during a service interruption will be taken into account in determining their overall level of performance.

The issue for recommendation below refers to every-day/ordinary communication about connection and disconnection, not to emergency situations.

<u>Issue for recommendation 17/E:</u> The DSO should provide easily accessible customer communication on electricity issues concerning connection and disconnection, in the following way(s) (several boxes can be ticked):



	Call centre <ul> <li>Specify availability, days/week:</li> </ul>
	Specify longest acceptable waiting time in phone queue:
	<ul> <li>e-mail</li> <li>Specify longest acceptable waiting time for answering:</li> </ul>
	website other, please specify below
Comn	nents, if any (maximum 100 words):
Issue	for recommendation 17/MG: the DSO should provide easily accessible custome

<u>Issue for recommendation 17/MG:</u> the DSO should provide easily accessible customer communication for micro generation unit issues concerning connection and disconnection, in the following way (several boxes can be ticked):

Call	centre
------	--------

- Specify availability, days/week:
- Specify longest acceptable waiting time in phone queue:

	e-mail	
	Specify longest acceptable waiting time for answering:	
	website	
	other, please specify below	
Comn	Comments, if any (maximum 100 words):	

<u>Issue for recommendation 17/G:</u> the DSO should provide easily accessible customer communication on gas issues concerning connection and disconnection, in the following way (several boxes can be ticked):

Call centre

• Specify availability, days/week:



-	Specify longest acceptable waiting time in phone queue:
	e-mail
	<ul> <li>Specify longest acceptable waiting time for answering:</li> </ul>
	website
	other, please specify:
Comm	nents, if any (maximum 100 words):

### 3.10. Customer enquiries concerning connection and disconnection

Response time to customer enquiries concerning connection and disconnection include the following issue for recommendation:

The response time to a customer enquiry

Issue for recommendation 18 (E, MG, G)

### • Customer enquiry

A customer enquiry could be defined as follows<sup>13</sup>: A request for information or advice, other than a complaint, made by a customer to a complaint handling body, a service provider or any organisation delivering information to customers (e.g. single point of contact).

As concerns the closely related matter of complaint handling, ERGEG has previously issued recommendations<sup>14</sup>.

If a customer makes an enquiry to a DSO, the DSO should respond substantively to the enquiry within a reasonable period of time. Since an enquiry is a request for information or advice, the issue for recommendation below is not the same as recommendation 1, on customer requests for a connection to the grid.

### Reference to CEER's 5<sup>th</sup>Benchmarking Report

The data on the average performance time of response to customer complaints and enquiries in years between 2008 and 2010 clearly shows that although the performance of DSOs and USPs/suppliers is different in responding countries, customers will receive a response to their notice within an average of 15 days. In

<sup>&</sup>lt;sup>13</sup> ERGEG GGP on Customer Complaint Handling, Reporting and Classification, Ref: E10-CEM-33-05.

<sup>&</sup>lt;sup>14</sup> This document includes 15 recommendations on complaint handling, as well as a proposal for complaints classification. The whole document can be accessed with the following link: <u>ERGEG Guidelines of Good</u> <u>Practice on Customer Complaint Handling, Reporting and Classification. Ref: E10-CEM-33-05. 10 June 2010</u>



Portugal, the average response time to customer enquiries in 2010 - 0.46 days for the DSOs – is very low because not only written enquiries but also all the phone enquiries (which are usually answered immediately or later in the same day) are considered. The average response time to customer complaints in 2010 was 8.5 days for the DSOs.

<u>Issue for recommendation 18/E:</u> The response time to a customer enquiry to an electricity DSO, should not exceed:

two days
one week
two weeks
other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 18/MG:</u> The response time to a customer enquiry regarding a micro generation unit to an electricity DSO, should not exceed:

two days
one week
two weeks
other time

other time period, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 18/G:</u> The response time to a customer enquiry to a gas DSO, should not exceed:

two days	;
----------	---

- two weeks
  - other time period, please specify below

Comments, if any (maximum 100 words):



### 3.11. Safety and emergency measures

Safety and emergency measures include the following issues for recommendations:

Information on correct installation handling	Recommendation 19 (E, MG, G)
Telephone service for electricity/ gas emergencies	Recommendation 20 (E,G)
Placing of telephone number for electricity/ gas emergencies	Recommendation 21 (E, G)
DSO attendance on gas emergency site	Recommendation 22 (G)

Electricity and natural gas bring benefits to millions of people, but they also must be treated with care and respect. The technical safety of employees, customers and the public is crucial. Access to customer information on safety measures is important. This information can be provided in several ways and through a variety of channels.

The electricity/gas DSO could e.g. provide a guide on safe installation handling to the customer. This guide could be sent by mail, published on the DSO website, given in person etc.

As a part of ensuring safety, some DSOs (i.e. in Spain and Portugal<sup>15</sup>), have the obligation to perform a safety inspection of the gas installation at the customer premises every 4 - 5 years. A natural gas inspection by the DSO checks three main safety aspects:

- Check the installation has no gas leaks.
- Check that the gas installation has correct ventilation and correct evacuating exhaust of combustion product.
- Check that the gas installation at the customer's premises (the boiler) is combusting properly i.e. without production of carbon monoxide.

In other countries, like UK, DSOs are required to develop a survey to measure carbon monoxide awareness in gas.

<u>Issue for recommendation 19/E:</u> The customer has the right to accessible information on correct installation handling, including safety measures, for the electricity installation:

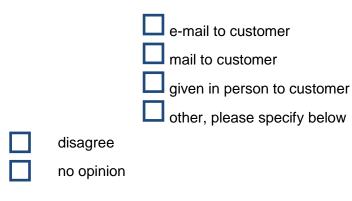


• Access shall be available through the following channels (several boxes can be ticked):

DSO website

<sup>&</sup>lt;sup>15</sup> In Portugal the obligation to perform an inspection every 5 years applies to installations with at least 20 years (there are also other conditions but they don't apply to households). Also, an inspection is mandatory if there is a change in the gas contract (doesn't apply if only the supplier changes, i.e. switching).





Comments, if any (maximum 100 words):

<u>Issue for recommendation 19/MG:</u> The customer has the right to accessible information on correct installation handling, including safety measures, for its micro generation unit:

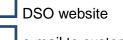
Agree •	Access shall be available through the following channels (several boxes
·	can be ticked):
	DSO website
	e-mail to customer
	mail to customer
	given in person to customer
	other, please specify below
disag	gree
no oj	pinion

Comments, if any (maximum 100 words):

<u>Issue for recommendation 19/G:</u> The customer has the right to accessible information on correct installation handling, including safety measures, for the gas installation:

Agree

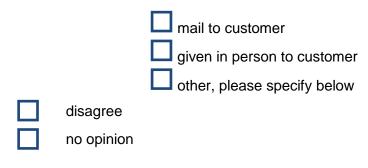
• Access shall be available through the following channels (several boxes can be ticked):



e-mail to customer

Ref: C13-RMF-57-03 Draft advice on regulating the quality of distribution services





Comments, if any (maximum 100 words):

### • Safety and emergency services related to gas and electricity emergencies

To ensure that customers can use natural gas and electricity in a secure way, the DSO usually has the obligation to put in place a comprehensive 24-hour safety system (see below) to cover any emergency, in the distribution grid. It covers also gas emergencies at the customer' premises. In some Member States there are obligations around the service and the associated response time.

To attend to gas emergencies, some countries (e.g. UK) have a national gas emergency telephone number. In some other countries, the supplier includes the DSO emergency telephone number in the customer bill (e.g. Spain and Portugal). Other countries use the European/International general emergency number 112.

<u>Issue for recommendation 20/E:</u> A telephone number for electricity emergencies should operate at all times during the year. The number should be a:

DSO number

National number



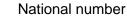
European emergency number

Comments, if any (maximum 100 words):

<u>Issue for recommendation 20/G</u>: A telephone number for gas emergencies should operate at all times during the year. The number should be a:



DSO number



European emergency number



Comments, if any (maximum 100 words):

<u>Issue for recommendation 21/E:</u> The customer should be able to find the telephone number for electricity emergencies in the following places (several boxes can be ticked):

at the meter
on the DSO bill
on the supplier bill
at the DSO website
at the supplier website
other, please specify below

Comments, if any (maximum 100 words):

<u>Issue for recommendation 21/G:</u> The customer should be able to find the telephone number for gas emergencies in the following places (several boxes can be ticked):

at
on
on
at
at
oth

at the meter on the DSO bill on the supplier bill at the DSO website at the supplier website other, please specify below

Comments, if any (maximum 100 words):

### • Time for DSO attending the site after a notice of a gas leak

When a DSO receives a report of a gas escape or other gas emergency, including a significant escape of carbon monoxide or other hazardous situations, it shall attend the site as quickly as possible.



In some countries (e.g. Spain, UK) gas emergencies are resolved within the following timescales<sup>16</sup>:

- a) <u>Uncontrolled escapes/gas emergencies</u>: Where the person reporting the escape, or someone on their behalf, has taken all the actions recommended by the call centre agent and can still smell gas. Those emergencies have to be attended within 1 hour.
- b) <u>Controlled escapes/gas emergencies</u>: Where the person reporting the escape, or someone on their behalf, has taken all the actions recommended by the call centre agent and can no longer smell gas. Those emergencies have to be attended within 2 hours.

<u>Issue for recommendation 22/G:</u> When a DSO receives a report of a gas escape or other gas emergency, including a significant escape of carbon monoxide or other hazardous situations, it should attend the site within

30 minutes
one hour
two hours
other time period, please specify:

Comments, if any (maximum 100 words):

### 3.12 Missing issues for recommendation?

<u>Issue for recommendation 23:</u> Is there any core feature of distribution services that has not been identified in this consultation paper and should be brought to NRAs' attention? Please specify whether your suggestion or comment refers to electricity, micro generation units or gas.

Comments, if any (maximum 100 words):

<sup>&</sup>lt;sup>16</sup> In Portugal, the DSOs have to attend to gas emergencies within 1 hour in 85% of the reported gas emergencies.



# 4. Summary of the service areas, definitions, issues for recommendation and relevant sectors

Service area	Definition		Issues for recommendation	Sector
New connection to the grid	The first connection of a micro generation unit or a house to the gas or electricity grid. Usually, a new connection involves major work. The cost and length of a new network connection can vary a lot depending on the physical situation of the new connection point.	1.	Time taken to respond to customer request	Electricity, Micro generation, Gas
		2.	Content of the response	Electricity, Micro generation, Gas
		3.	Time taken to provide the price offer	Electricity, Micro generation, Gas
		4.	Time taken to initiate the connection	Electricity, Micro generation, Gas
Connection of a new customer to the network	The action of connecting a gas or electricity installation to the network, leaving the installation ready for service activation. The gas or electricity installation is already in place at the customer premises. Depending on the circumstances and the national regulation, connection of a new customer may involve minor work.	5.	Time taken to provide the price offer	Electricity, Micro generation, Gas
		6.	Time taken to connect	Electricity, Micro generation, Gas
Activation of energy supply	The action of starting the delivery of energy to a point of supply. To request the activation of the energy, the customer needs to have a previous agreement with a supplier (a gas or electricity supply contract). Thus, in most countries, the market player who contacts the DSO for the service activation is the supplier.	7.	Time taken to activate energy supply	Electricity, Micro generation, Gas
Disconnection	The action of interrupting delivery of energy supply to a	8.	Time taken to disconnect after	Electricity, Micro



of energy supply, after customer request	point of supply. The recommendation refers to a situation where the disconnection is requested by the customer.		customer request	generation, Gas
Warning mechanisms before disconnection due to non- payment	A minimum time from notice to pay before disconnection due to non-payment is commonly used as a protection measure to the customers.	9.	Time between last notice to pay and disconnection due to non-payment	Electricity, Gas
Reactivation of energy supply after disconnection due to non- payment	The time for reactivation of energy supply following a disconnection due to non- payment is the time period between the notice of customer payment of debts (after a disconnection due to non-payment) and the reactivation of the energy supply to the customer.		Time taken to reactivate energy supply after a disconnection due to non-payment (no new meter installed)	Electricity, Gas
			Time taken to reactivate energy supply after a disconnection due to non-payment, when new meters are to be installed	Electricity, Gas
Planned energy interruptions	Planned supply interruption is an interruption where the customer is informed in advance of the interruption.		Time of notification of planned supply interruptions Duration limit of a	Electricity, Gas
		13.	planned supply interruption	Electricity, Gas
Information during un- planned energy supply interruptions	Un-planned supply interruption is an interruption when the customer is not informed in advance of the interruption.	14.	Time taken to provide customer information during and unplanned supply interruption	Electricity, Gas
Information on services and rights regarding connection and disconnection	Clear, user-friendly and comprehensible customer information should be made available concerning the procedure to contract distribution services and customers rights regarding connection and disconnection.	15.	User friendly information on connection and disconnection and customer's rights related to those	Electricity, Micro generation, Gas
		16.	Punctuality of appointments with customers	Electricity, Micro generation, Gas
		17.	Easily accessible communication interface with customers	Electricity, Micro generation, Gas
Customer	An enquiry is a request for information or advice, other	18.	Response time to customer enquiries	Electricity, Micro



enquiries concerning connection and disconnection	than a complaint, made by a customer to a complaint handling body, a service provider or any organisation delivering information to customers (e.g. single point of contact).	concerning connection and disconnection	generation, Gas
		19. Accessible information on correct installation handling including safety measures	Electricity, Micro generation, Gas
Safety and emergency measures	Safety and emergency measures concerning installation handling, telephone number and fast attending on site.	20. Telephone number for electricity and gas emergencies	Electricity, Gas
		21. Where to find the telephone number for electricity and gas emergencies	Electricity, Gas
		22. Time taken to attend the site after a notice of a gas leak	Gas

### 5. Public consultation and next steps

This CEER public consultation, launched on 04/12/2013, is carried out through a dedicated online questionnaire on the European energy regulators website. CEER invites all interested stakeholders to respond to this public consultation. The deadline for responses is **31 January 2014**. CEER welcomes wider comments in the comments box for each question. All responses, except confidential material, will be published on the website <u>www.ceer.eu</u>.

After the consultation period, CEER will analyse all the responses received. The results of the consultation will be presented at a public hearing Q2 2014. Following this public hearing, CEER will develop its final advice, aiming to publish it around mid-2014.



### Annex 1 – CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. Through CEER, a not-for-profit association, the national regulators cooperate and exchange best practice. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest.

CEER works closely with (and it supports) the <u>Agency for the Cooperation of Energy</u> <u>Regulators (ACER)</u>.

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

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

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

CEER represents 32 energy regulators from across Europe.



### Annex 2 – List of abbreviations

Term	Definition		
ACER	Agency for the Cooperation of Energy Regulators		
BEUC	The European Consumer Organization		
CEER	Council of European Energy Regulators		
CRM WG	Customer and Retail Market Working Group		
DSO	Distribution System Operator		
#/E	Electricity (with regard to the division of the draft recommendations in this publication)		
EC	European Commission		
ERGEG	European Regulators' Group for Electricity and Gas		
EU	European Union		
#/G	Gas (with regard to the division of the draft recommendations in this publication)		
GS	Guaranteed Standards		
#/MG	Micro Generation Unit (with regard to the division of the draft recommendations in this publication)		
NRA	National Regulatory Authority		
OS	Overall Standards		
RMF TF	Retail Market Functioning Task Force		
TSO	Transmission System Operators		
USP Table 2. List of Abbraviations	Universal Service Provider		

Table 2 – List of Abbreviations



### Annex 3 – Glossary of Terms

The descriptions of terms listed here serve to provide a common understanding of the different subjects and apply to the issues addressed in this document. For any other issue of general importance or of common understanding, please refer to the definitions in the existing legal framework, including (EC) 2009/72 and (EC) 2009/73. Some differences with definitions already in use in other situations and/or specifications might be possible.

**Activation of energy supply**: the action of starting the delivery of energy supply. Connection of a customer and service activation can be done at the same time.

**Connection of a new customer** (for micro generation units or houses already connected to the grid): the action of connecting a gas or electricity installation to the network, leaving the installation ready for service activation. The gas or electricity installation is already in place at the customer premises. Depending on the circumstances and the national regulation, connection of a new customer may involve *minor work*.

**Connection point:** point in the network at which the grid user installation is to be connected; this point is defined and agreed upon by the TSO or DSO and grid user.

**Customer:** Where this report refers to customers they are to be understood as household customer and those customers that are deemed to be encompassed by Annex I of the 2009 Electricity/Gas Directives when implementing the 3<sup>rd</sup> Package. Furthermore, in his Draft Advice, customers can also to be understood as micro generation units with a maximum capacity below 50 kW.

**Disconnection of energy supply**: the action of disconnection of the delivery of energy supply. A disconnection can be done for example upon customer request or after a non-payment.

**Distribution System Operator**: a natural or legal person responsible for operating, ensuring the maintenance of and, if necessary, developing the distribution system in a given area and, where applicable, its interconnections with other systems and for ensuring the long-term ability of the system to meet reasonable demands for the distribution of electricity or gas.

**Major work**: connections of new micro generation units or houses (household customers) to the grid. It may require several visits of works at the customer's premises, works in the street and in some cases, also administrative authorization.

**Micro generation unit:** A generation unit with a maximum capacity below 50 kW.

**Minor work**: a connection that requires no more than one or two visits of work at the customer's premises. This is usually the case when the gas or electricity installation is already in place at the customer premises. However, depending on the circumstances and national regulation, connection of a new customer may involve several of the following processes, like for example:

- Checking the documentation
- Installing or checking the meter
- Installing or checking the Power Control Switch
- Checking the security of the installation
- Checking the compliance of the installation to the technical regulation



**New connection to the grid** (for household customers): the first connection of a micro generation unit or a house to the gas or electricity grid. Usually, a new connection involves *major work*. The cost and length of a new network connection can vary a lot depending on the physical situation of the new connection point.

**Prosumer:** A prosumer is a pro-active energy customer, who takes an active role in choosing and using an energy product or service.



### Annex 4 - ERGEG GGP on Regulatory Aspects of Smart Metering for Electricity and Gas

The recommended guidelines are as follows:

E/G 1. Customer control of metering data

- E 2. Information on actual consumption and cost, on a monthly basis, free of charge
- E 3. Access to information on consumption and cost data on customer demand
- E 4. Easier to switch supplier, move or change contract
- E 5. Bills based on actual consumption
- E 6. Offers reflecting actual consumption patterns
- E 7. Remote power capacity reduction/increase
- E 8. Remote activation and de-activation of supply
- E 9. All customers should be equipped with a metering device capable of measuring consumption and injection
- E 10. Alert in case of non-notified interruption
- E 11. Alert in case of exceptional energy consumption
- E 12. Interface with the home
- E 13. Software to be upgraded remotely
- E 14. When making a cost benefit analysis, an extensive value chain should be used
- E 15. All customers should benefit from smart metering
- E 16. No discrimination when rolling out smart meters
- G 2. Information on actual consumption and cost, on a monthly basis, free of charge
- G 3. Access to information on consumption and cost data on customer demand
- G 4. Easier to switch supplier, move or change contract
- G 5. Bills based on actual consumption
- G 6. Offers reflecting actual consumption patterns
- G 8. Remote enabling of activation and remote de-activation of supply
- G 11. Alert in case of exceptional energy consumption
- G 12. Interface with the home
- G 13. Software to be upgraded remotely
- G 14. When making a cost benefit analysis, an extensive value chain should be used
- G 15. All customers should benefit from smart metering
- G 16. No discrimination when rolling out smart meters



## Annex 5 - ERGEG GGP on Customer Complaint Handling, Reporting and Classification

### The guidelines are as follows:

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

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 third party body should be proposed, among the following options: address, phone number, website, email, face to face contact point. In particular:

- Service provider websites: Any information on complaint handling must be easily found on the website, including the steps towards the investigation and eventual resolution of a complaint, and the name(s) and contact information of the relevant third-party body.
- Customer service call centres: They should be able to inform customers about the steps towards the investigation and eventual resolution of a complaint, and the name(s) and contact information of the relevant third-party body.

3: To submit a complaint to a service provider, a wide range of channels should be available, and, as a minimum, post-mail and phone.

4: Statutory complaint handling standards common to electricity and gas service providers should be in place. Such standards should be determined at a national level, taking into account the maturity of the market and the national legislative and regulatory provisions on customer rights. NRAs are best placed to set up these standards, after consultation with stakeholders, as appropriate, and to enforce them. Once the complaint handling standards have been set up, they should be made public and available on request, in a printed document if requested by customer to his/her service provider. These standards should cover:

- A prompt first answer or acknowledgement within one day: When receiving a customer complaint and whatever the channel of reception, service providers should systematically inform their customers via:
  - either a final answer, presenting the solution proposed by the service provider (even when it considers that the case is already solved, from its point of view), by close of business on the day following receipt of the complaint;
  - or a first acknowledgment of the complaint, by close of business on the day following receipt of the complaint. This acknowledgment acknowledges the complaint and informs on the initiation of the complaint's handling process and the following steps to be taken. The communication provides details of the service provider's own complaint handling procedures and redress scheme if available as well as information on alternative dispute settlement bodies, even when the customer must wait until the end of the service provider's handling process to submit his/her case to the alternative dispute settlement body.
- A lead time to deal with a complaint: A final answer of the service provider including information on the ADR body should be issued as soon as possible, but within two months.
- Registration of all customer complaints: This should preferably be done using a common classification of the complaints.



5: In each Member State, redress schemes should be in place to allow compensation in defined cases.

6: Service providers should follow the alternative dispute settlement body's (ADS) recommendations even if they are not legally binding.

7: When a regulator deems it appropriate to receive data on complaints, with the aim of monitoring retail markets, the service provider should give the regulator access to these data. At a national level, the scope of data collection on complaints, its modalities, frequency and data format required should be defined. Data collection should be standardised.

8: A single point of contact should deliver, in every country, free information and advice on customer issues. Such a single point of contact could deliver, for example, information on: suppliers; different types of supply contracts; price comparisons; customer 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 (if the single point of contact is not also the relevant third party body). This service should be set either by government or the NRA (in some cases in cooperation with other bodies in charge of customer issues). It should be easily available either by phone, email, written mail (letter or fax) or in person.

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.

10: In order for a customer 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.

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.

12: Regarding third party bodies, complaint handling standards should be determined at a national level and be effective, in accordance with the above-mentioned Commission Recommendation and 3rd Package legal provisions. Such standards should include:

- Registration of complaints by using a common classification, as far as possible, preferably ERGEG classification.
- Written complaint procedures determined within third parties, and made available to all customers. These procedures should include, among others:
  - The issue of a prompt first answer or acknowledgement of the complaint;
  - A lead time to solve the complaint. 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;
  - Communication of complaint to the service provider(s) before coming to a decision/recommendation; and



- It must be clear what the enforcement limits of alternative dispute settlement body's process are. Customers should be informed whether their energy company must comply with the recommendation or not.

13: Customers whose complaints have been settled in their favour by an alternative dispute settlement body should be allowed a fair compensation from their service provider.

14: When a regulator deems it appropriate to collect data on complaints, with the aim of monitoring retail markets, it should have the possibility to receive the relevant information from third parties as well as from service providers (see Recommendation 7). Data on complaints can be used by a regulator who decides to publish reports on complaints, within the framework of its retail market monitoring activities.

15: Third party bodies having responsibility for 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;
- Identification of areas of improvement on the retail market, following the analysis of complaints; and
- A list of third-party bodies' recommendations which have not been followed by service providers, including their names.

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