

**EEOG Comments on the
“Public Consultation Paper on Draft Guidelines for Retail
Market Monitoring”**

Regarding the public consultation process to the mentioned document, please find enclosed comments subscribed by European Energy Ombudsmen Group.

As the EEOG is concerned with the quality of customer services this document will only comment the indicators included in chapter 4.

First of all, EEOG wishes to underline that we defend ERGEG's declaration “the customer's experience is both a key market output and an indicator of the health of the market overall”. In that sense, EEOG believes that the market efficiency partly is reflected through the quality of complaint handling and the ability to provide correct answers to claims.

In a well functioning market, complaints are always welcomed, as they open a dialogue with the customers. Our group regard dissatisfaction as a result of a poor handling, not the complaint itself.

The quality of the market functioning is shown by the level of customer satisfaction. EEOG believes that the majority of complaints are not related to market functioning, instead they are related to the technical aspects that are to be found within the distribution of electricity. Thereby, as an indicator, the number of complaints per se is not directly linked to customer satisfaction and is therefore not fully relevant.

To find a correct link between complaints and a well-functioning market, it is better to focus on the percentage of complaints solved on the first contact with the customer, the percentages of repeated complaints or the average time of response. These indicators could provide a better idea of customer satisfaction.

A relevant indicator could also be the measurements obtained from Surveys on Satisfaction with Customer Service.

Those indicators could provide a better idea of the customer's satisfaction.

Regarding the number of customer enquiries, the EEOG is afraid that the functional relationship between the number of enquiries and a well functioning market is not established.

Finally, concerning a reliable price comparison website available for customers, EEOG believes that price is not the only parameter of customer satisfaction. EEOG considers that such indicator should be complemented with other indicators for the evaluation of overall customer satisfaction. Evaluation of customer satisfaction should not be limited to the variables “price” and “internet channel”.



In that sense, EEOG suggests to include the following indicators (expressed in a table which distinguishes type of information and support):

Type of information	Phone (Agent)	Website	Front desk (Agent)	Bills
▪ Is there available information about the complain process?	Yes/No	Yes/No	Yes/No	Yes/No
▪ Is there reliable price comparison information?	Yes/No	Yes/No	Yes/No	Yes/No
▪ Is there free information on Consumer's rights?	Yes/No	Yes/No	Yes/No	Yes/No
▪ Is there separate information related to DSO and supplier processes and own duties?	Yes/No	Yes/No	Yes/No	Yes/No