

CEER draft advice on Price Comparison Tools

Summary of responses

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36 responses

- 18 Energy suppliers
- 6 Consumer organisations
- 4 PCTs
- 3 Energy supplier organisations
- 2 DSO
- 1 Energy regulatory authority
- 1 TSO
- 1 Academic

Themes

- I. Independent
- II. Transparent
- III. Exhaustive
- IV. Clear and comprehensive
- V. Correct and accurate
- VI. User friendly
- VII. Accessible
- VIII. Background information

I Independance

1. PCTs should be independent and provide a non discriminatory view of the market. Information must be shown in a consistent way.
 - All respondents agreed
 - This can build consumer confidence
 - Some asked for clarification of 'independance'

I Independance

2a. Regulatory oversight of privately run PCTs is important to bolster confidence. This should be the responsibility of the NRA or a public body.

- Majority agreed – to provide accuracy and confidence
- NRAs have a role to play in monitoring PCTs
- Different routes: Regulation, accreditation, legislation, voluntary codes of conduct or self regulation.
- Others said only regulate if necessary
- The oversight body should be trustworthy and recognised

I Independance

2b. Alternatively this could be left to self regulation by the industry or voluntary codes of conduct.

Agree

- Enables choice and new entrants
- Useful first step – then regulate if necessary
- Puts fewer burdens on NRAs
- NRAs should still monitor or maybe accredit PCTs.

Disagree

- Self regulation hard to enforce
- Potential conflicts of interest
- Voluntary/Industry codes should be monitored – by NRAs or others

II Transparency

3. Price comparison websites should disclose the way they operate to provide transparent information on the impartiality of their advice.

All respondents agreed.

Consumers should be able to access this information and it should be easy to understand.

III Exhaustive

4. When possible, all prices and products available should be shown as a first step. If it doesn't give a complete overview of the market the PCT should state that. Filtering results should be offered to consumers.
 - Most respondents agreed all options should be provided up front
 - Consumers should then be allowed to filter information to suit their needs
 - Others thought it was more helpful to allow this filtering up front
 - This question prompted discussion about whose role it is to ensure that the data is comprehensive and accurate – the PCT, the supplier or the NRA?
5. The customer should be able to specify a request by entering specific data. Help is needed to determine consumption as accurately as possible.
 - Majority agree filtering results is important
 - Some suggest standardising data/using proxies for consumption
 - Others suggested that consumers should be encouraged to input their actual consumption

IV Clarity and Comprehensibility

6. Costs should be presented in a way that is easily understood eg cost per year or kWh price.
 - Vast majority agreed to display costs clearly, on the basis of the contract duration.
 - Some noted that this may just be an estimation
7. Fundamental characteristics of all products should be presented on the first result screen.
 - All respondents agreed

IV Clarity and Comprehensibility

8. PCTs should offer additional information on products and services.
 - Vast majority agreed.
 - Guidelines for minimum content of the first page
9. Regulated prices should be highlighted
 - Vast majority agreed
 - This should avoid positioning regulated tariffs as being better

V Correct and accuracy

10. Price information should be updated as often as necessary to reflect the market.

- Most of the respondents agreed
- Though different times were suggested: within 24h, 2 working days, 5 working days
- PCT has to be responsible for correctness
- Specific national provisions in Germany

11. The consumer should be offered help through default consumption patterns.

- All respondents agreed
- Consumers should be given the choice of the amount/ type of information they enter
- Options include yearly, quarterly or monthly consumption or description of household

12. At least one other communication channel should be offered free or at minimal cost

- Many agreed
- However, many said this should be optional rather than a prerequisite, notably for private comparison tools.
- The needs of vulnerable customers should be taken into account when providing an other communication channel.
- The comparability of the results between the different channels is important.

VII Accessibility

13. PCTs should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.
- All agreed
14. The use of social media and cooperation with other (public) agencies should help make the NRA-run price comparison tool widely known.
- Those that disagreed found that using social media should not be a prerequisite.

VIII Background Information

15. Background information on marketing functioning should be provided if the consumer wants it.
- Many agreed
 - Or this should be done by a supplier, NRA or single point of contact (EC Checklist)
 - Or a PCT could provide a link to such information
16. A good practice is to offer a reminder before a fixed contract ends if the consumer wants it.
- 29 out of 36 respondents agreed
 - Others suggested it should be for suppliers
 - Seen as an optional service, not a requirement

Next steps

- Today's discussion
- Discussion within CEER
- Develop and finalise the GGP
- Present at the London Forum in November



QUESTIONS

Discussion

- Setting the standard for PCTs
 - Regulation vs self-regulation
- Information and content
 - Consistency vs innovation and differentiation
 - Simplicity and comprehensibility
 - 'Need to know' vs 'nice to have'
 - Responsibility for data to be accurate and up to date
- Inclusivity
 - Cost and complexity of other channels
- Future challenges for PCTs

Thank you for your attention!

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