



GEODE POSITION ON ERGEG PUBLIC CONSULTATION ON DRAFT ADVICE ON CUSTOMER HANDLING, REPORTING AND CLASSIFICATION

The European Regulatory Group for Electricity and Gas (ERGEG) has launched a Public Consultation on its Draft Advice on Customer Handling, Reporting and Classification, that aims to provide Member States and national regulators with an input on how to translate into operational modalities the new provisions on customer protection, and in particular those regarding customer complaint handling, contained in the 3rd energy package. **GEODE** welcomes the opportunity to contribute.

GEODE, in general, supports 3rd Energy package provisions regarding information on the bills about the means of dispute settlement, creation of independent mechanisms for the treatment of complaints and disputes and complaint monitoring.

GEODE supports main principles pursued by ERGEG 15 draft recommendations in the draft advice paper which are availability and transparency of information for customers, simplicity of procedures and effectiveness as regards customer complaint procedures.

Regarding recommendations for service providers referring to both, DSOs and suppliers, about information on the bill on how to complain, choice of the complaint channel, complaint handling standards shared by all service providers as regards complaint handling procedures and redress schemes and time of the complaint procedure and common registration and classification of complaints, **GEODE** would like to underline that too concrete and detailed recommendations could be disproportional with the general provisions contained in the new Directives..

As regards the recommendation on the “single point of contact”, it seems that ERGEG considers that the supplier and not the DSO should be the single point of contact with the consumer as a way to increase customer confidence in the market. However **GEODE disagrees with ERGEG as we consider that DSOs are the natural and neutral contact with customers.** **GEODE** recommends ERGEG to further analyse this recommendation and offers his support to contribute to ERGEG’s work on that respect providing more detailed information from distributor’s point of view.

On that respect **GEODE** would like to outline that as the conclusions of the 2nd Citizens' Forum state *“single points of contact should represent the need for separate information flows related to DSO and supplier processes”*.