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WEBINAR



Webinar on CEER Report:
Consumer Protection Issues 2026

Thursday 22 October • 13:00 - 14:00 CEST • Online

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Agenda

13:00-13:05 Opening Remarks and Keynote Speech

- Natalie McCoy, Chair of the Customer & Retail Markets Working Group, CEER

13:05-13:20 Presentation of the CEER Report

- Florian Pichler, Lead drafter, CEER

13:20-13:40 Stakeholder Reactions

- Massimo Serpieri, Policy Officer, DG ENER
- Frederico da Silva, Head of Energy, BEUC

13:40-14:00 Q&A and Closing Remarks

- Cinzia Mauro, Coordinator of the Customer & Retail Markets Working Group, CEER
- Natalie McCoy, Chair of the Customer & Retail Markets Working Group, CEER

OBJECTIVES

- Portray selected consumer challenges in depth for better understanding
- Investigate existing good practices/measures by NRAs and MS
- Propose additional solutions/improvements on status quo
- Beyond monitoring (cf. ACER CEER Reports)

BACKGROUND/METHODOLOGY

- Selection of 5 consumer issues of wide relevance across EU
- Case studies build the foundation, enriched by NRA survey data

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1. Bill design
2. Complaint handling
3. Switching process & procedures
4. Contract termination fees
5. Unfair commercial practices

Bill Design: How to ensure a comprehensible bill despite growing complexity in energy markets and energy cost composition?

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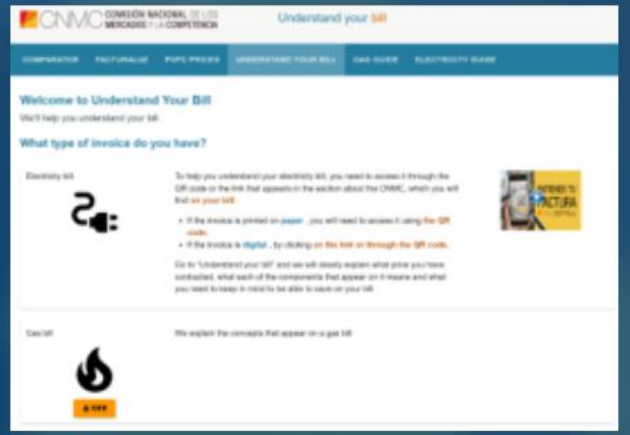
High complexity...

- Market design
- Regulatory framework
- Information (overflow)
- New products
- Participation

...and high expectations

- Competing objectives
- Different uses and preferences
- Digitalisation





but bills can never be silver bullets!

Bill Design: How to ensure a comprehensible bill despite growing complexity in energy markets and energy cost composition?

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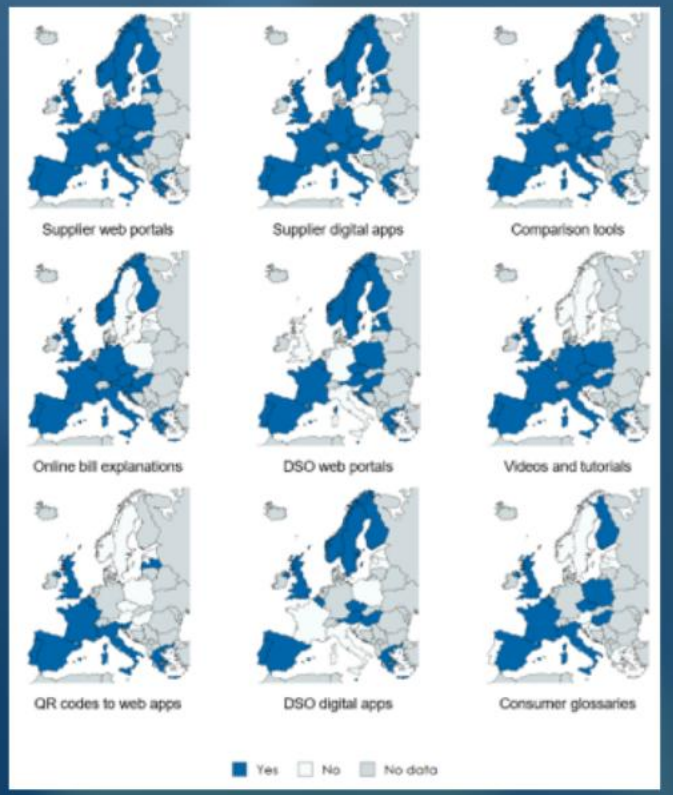
SOLUTIONS

1) Sample bills

- Short, simple, visual, familiar
- Consulted with stakeholders
- Make use mandatory but allow some corporate (design) freedom

2) Digital tools

- For supplementary info, individual and general
- Variety of options: QR, apps, portals, websites, glossaries, videos…
- Supports engagement (switching, participation)



Recommendations

1. **Prioritise** concise, essential and prominently displayed key billing information
2. **Promote** clearly structured, visually appealing and comparable sample bills developed through stakeholder consultation and make them mandatory
3. **Integrate** digital tools into billing practices to increase user-friendly access to more information and engagement opportunities

Complaint Handling: How to inform about the possibility, how to complain and what to expect from market operators and NRAs?

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- Definition
- Judicial conflicts
- Lack of consumer literacy
- Increasing complexity
- Consumers expectations

Recommendations

1. Define what a complaint is
2. Establish simple and accessible procedures (digital tools), inform about them
3. Set deadlines and compensations
4. Partner up with ADR bodies

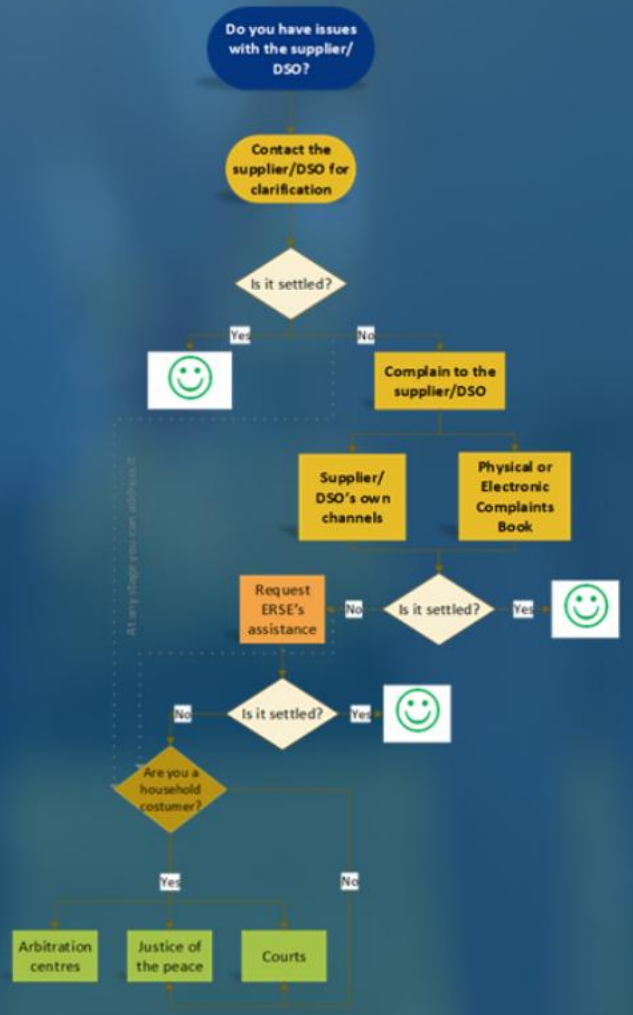
SOLUTIONS

Clear information
- Procedures
- NRA competences

Mandatory deadlines and compensations
- Raise trust in the markets
- Strengthen supplier and DSO accountability

Digital tools
- Easy access and filing
- Follow up

ADR partnerships
- Easy access
- Training by the NRAs



Switching Procedures: How to set up a smooth, fast and (cyber) secure fast switching process?

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STARTING POINTS

- Lack of information
- Consumer protection
- Operational and technical inefficiencies

...while choice exists in fully exercised theory, in practice it is not always the case





SOLUTIONS

Simple and transparent information

- PCTs
- Energy bills

Security of switching process

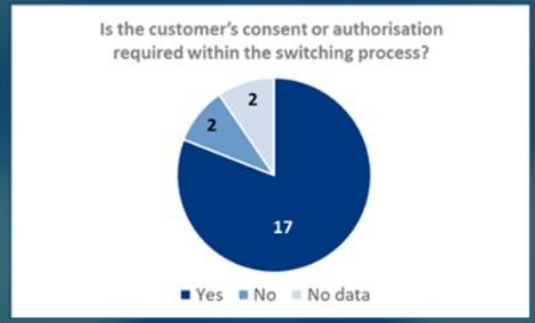
- Operational follow-up
- Continuous communication

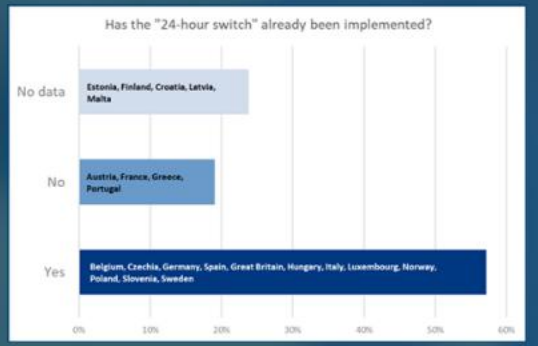
Digitalisation

- Prevent unauthorised switching
- Consumers retain control

Recommendations

1. **Improve transparency** and **comparability** of energy offers
2. Strengthen and harmonise **switching procedures**
3. Enhance **consumer protection and cybersecurity requirements**
4. Ensure **effective supervision** and **continuous market coordination**





Contract Termination Fee: How to enable contract termination while acknowledging supplier loss?

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- **Regulatory scope:** what types of contracts are covered and how to deal with “innovative products”?
- **Awareness:** even pre-contractual information must “reach” consumer
- **Costs of termination:** proportionate to what? Economic loss in individual case, supplier exposure, market-based benchmark?
- **Verification:** general principles v. indicative methodologies, resource-intense monitoring
- **Evasion attempts:** getting hold of indirect fees

Contract Termination Fee: How to enable contract termination while acknowledging supplier loss?

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Recommendations

1. Apply termination fees **only to fixed-term, fixed-price contracts** and only where early termination causes a demonstrable direct economic loss to the supplier.
2. Ensure that fees are **proportionate, predictable and progressively reduced** as the contract approaches its expiry date.
3. Require suppliers to disclose clearly the **existence, maximum amount and calculation method** of the fee before contract conclusion.
4. Develop **common principles or indicative calculation methodologies** to support consistent regulatory assessment and enforcement.
5. Prohibit and monitor **indirect termination fees**, including non-refundable subscriptions, administrative charges or the recovery of promotional benefits.
6. Include termination-fee information in **contract summaries and price comparison tools**, allowing consumers to compare the real cost of different offers.
7. Consider a **fee-free period shortly before contract expiry**, enabling consumers to search for and switch to a better offer without unnecessary lock-in.
8. Strengthen NRA monitoring through supplier data, consumer complaints and targeted supervisory action.

Unfair Commercial Practices: How to protect consumers with limited knowledge/market understanding from exploitative customer acquisition practices?

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SAME SOLUTIONS

- Restricting unsolicited contact (door-to-door and telephone).
- Enhanced transparency, strengthened documentation requirements, enforcement



Recommendations

1. Regulations should focus on preventing commercial practices that artificially create a sense of urgency and pressure consumers to contract.
2. Preventive measures should be complemented by effective enforcement tools.
3. NRAs should also be vigilant on unfair commercial practices in the SME market segment, sharing experiences and actions.



Summary of recommendations

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1. **Bill design:** concise, clear, comparable sample bills with digital supplements
2. **Complaint handling:** define, accessible tools, deadlines, compensations
3. **Switching:** standardised, cybersecure, supervised
4. **Termination fees:** transparent rules, common principles, no evasion
5. **Unfair commercial practices:** prohibitions, encompassing enforcement

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Stakeholder Reactions



Massimo Serpieri

Policy Officer,
DG ENER (Unit B1),
European Commission



Frederico Oliviera da Silva

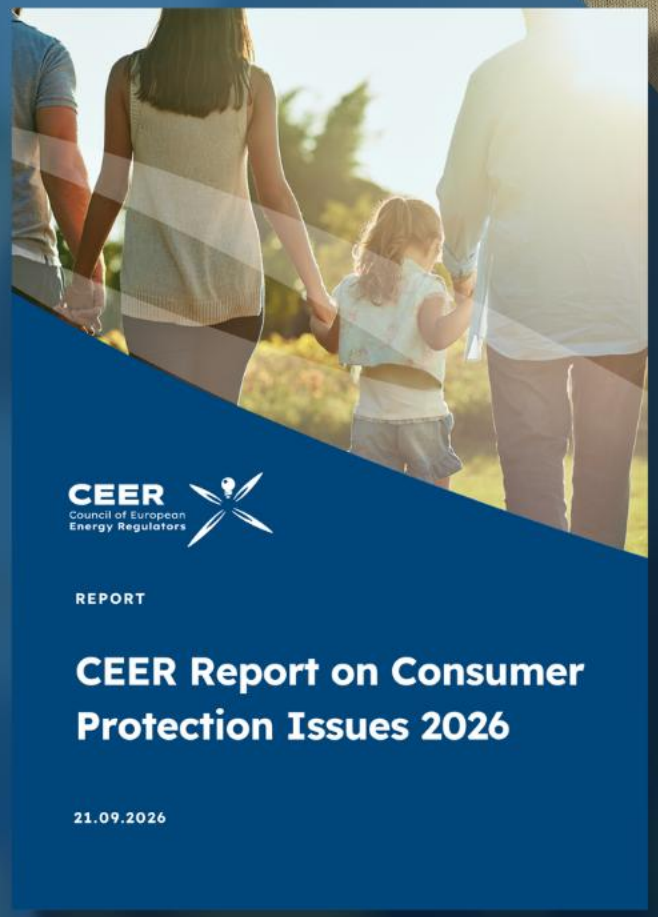
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Q&A



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Thank you!

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