



Consumer study on “Pre-contractual information and billing in the energy market – improved clarity and comparability”

Country fiches

EUROPEAN COMMISSION

**Produced by Consumers, Health, Agriculture and Food Executive Agency (Chafea) on
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Consumer study on “Pre-contractual information and billing in the energy market – improved clarity and comparability”

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COUNTRY FICHE

AUSTRIA

Key take-aways

This section presents a general summary of the key observations for Austria on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in German and sometimes in English
- On average, 80 tariffs are offered on the energy suppliers' websites based on a sample of 6 suppliers
- Out of these 80 tariffs, 40 household electricity offers, 16 household natural gas offers, 1 household mix electricity and gas offers, 22 '100% green offers' and 1 self-generation tariffs are offered
- 6 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Electricity Act 2010, Art. 80 (3) and Gas Act 2011, Art. 125 regulate the minimum requirements regarding the content of offers presented to consumers

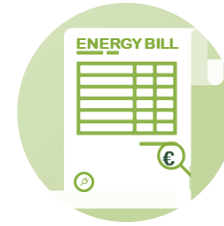


Price Comparison Tools

Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Electricity Act 2010, Art. 76 and the Gas Act 2011, Art. 123
- There are no requirements included in the national legislation on contract termination fees
- Information on switching and contract termination is provided to customers on the 'consumer rights' page of the Regulator Energie-Control Austria or E-Control*
- A consumer organisation (VKI) conducted a collective switching campaign**

- There are 6 Price Comparison tools in Austria in total (sample of 4 PCTs studied)
- 4 out of 4 PCTs studied are privately owned, 1 of them is accredited by the Regulator E-Control
- There is no certification body nor scheme in Austria
- 0 out of 4 PCTs clearly state on their websites to cover 100% of the energy market in Austria in terms of energy suppliers and available offers, based on a sample of 4 PCTs



Energy Bills

- The Electricity Act 2010, Art. 81 and the Gas Act 2011, Art. 126 regulate the energy bills for electricity and gas suppliers
- Electricity Act, Art. 81 & 82 and Gas Act, Art. 126 & 127 regulate billing frequency



*E-Control, 'Souveräner Kunde in einem freien Markt' page: <https://www.e-control.at/en/rechtlicher-rahmen-fach-sonderthemen>

**BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Pre-contractual Information

General overview



The offers are presented in German and sometimes in English



80

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



6 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

The Electricity Act 2010, Art. 80 (3) and the Gas Act 2011, Art. 125 indicate that the terms and conditions or contract forms between suppliers and customers must at least include:

- Terms and conditions of the contract
- Services to be provided, expected quality and the expected time for the contract start date
- Contact details of the supplier
- Services provided and their quality
- Energy rate in cent/kWh, including fees, levies and taxes
- Duration of the contract, conditions for renewal and termination, existence of a right of withdrawal
- Conditions for supply
- Dispute resolution procedures
- Payment modalities

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **40 household electricity offers**, **16 household natural gas offers** and **1 household mix electricity and gas offer**
- 6 out of 6 energy suppliers provide **22 '100% green offers' in total** (1 supplier offers 1 green offer, 1 supplier offers 2 green offers, 1 supplier offers 3 green offers, 1 supplier offers 4 green offers and 2 suppliers offer 6 green offers each)
- 1 out of 6 energy suppliers offers **1 self-generation offers**



Bundled offers

2 out of 6 energy suppliers offer **4 bundled services in total** (1 supplier offers 1 bundled services and 1 supplier offers 3 bundled services)

Source: National Regulator E-Control website

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

According to the Electricity Act 2010, Art. 76 and the Gas Act 2011, Art. 123:

- The supplier must apply the switching within 2 weeks after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fee

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 5 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Information on switching and contract termination is provided to customers on the 'consumer rights' page of the Regulator Energie-Control Austria or E-Control**

A consumer organisation (VKI) conducted a collective switching campaign***



**E-Control, 'Souveräner Kunde in einem freien Markt' page: <https://www.e-control.at/en/rechtlicher-rahmen-fach-sonderthemen>


***BEUC, The European Consumer Organisation, Collective energy switch:


http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf





Price Comparison Tools (PCTs)

General overview

6
 There are 6 Price Comparison tools in Austria (sample of 4 PCTs studied)

 4 out of 4 PCTs studied are privately owned, 1 of them is accredited by the Regulator E-Control

 There is no certification body nor scheme in Austria

0 out of 4
 PCTs clearly state on their websites to cover 100% of the energy market in Austria in terms of energy suppliers and available offers, based on a sample of 4 PCTs

Market coverage

Out of 4 privately owned PCTs studied:

- 1 PCT covers the largest suppliers and the most popular offers
- 1 PCT covers more than 50 suppliers and does not clearly indicate its market coverage in terms of suppliers
- 2 PCTs do not clearly indicate their market coverage in terms of offers and suppliers

Business model

- 2 out of 4 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 3 out of 4 PCTs studied display information as regards the **source of data** presented on their websites
- 2 out of 4 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 3 out of 4 PCTs studied present information regarding **the switching procedures** of their websites
- 3 out of 4 PCTs studied explain **how often data** presented on their websites **is being updated**
- 1 out of 4 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 1 out of 4 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria**:

At a minimum

- Payment method

In addition***

- Display only green offers
- Exclude new entry discounts
- Display only fixed price offers

The **first results pages***** on the PCT website shows per offer:

- Annual rate
- Estimated amount of savings
- Supplier name
- Offer name
- Link to offer details
- Contract duration
- Link to switching details

Non-price elements

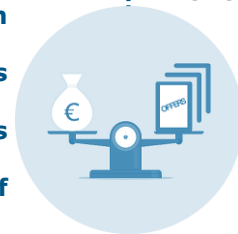
The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions
- % of green energy
- Payment methods

In addition***

- Contract termination conditions
- Fee structure





Energy Bills

General overview



5 out of 6

Energy suppliers explain the content of their bills on their website



5 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



2 out of 5

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 5 example bills)

Legal requirements

The Electricity Act 2010, Art. 81 and Gas Act 2011, Art. 126 regulates the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The charges and price (in cent/kWh) for electricity
- The allocation of the customer facilities to the system levels
- The contracted and/or purchased extent of system utilisation in kW
- The meter point administration numbers (electricity) or counting point names and stops used for the settlement (gas)
- The meter readings used for billing
- Information about how meters have been read
- The consumption per hour during the billing period, and a year-on-year comparison
- Information on the option of meter reading by the customer
- Telephone numbers for incidents and failures
- The process for instating a dispute settlement procedure
- The transported energy quantities during the billing period per tariff period
- The charging combustion value kWh / m³ used for conversion from volume to energy

Frequency of consumption statement

The Electricity Act, Art. 81 & 82 and the Gas Act, Art. 126 & 127 ensure that consumers receive **at least one annual statement presenting their consumption**

Energy suppliers shall provide consumers, free of charge, and an information sheet enclosed with the bill **once a year**



Content

The Austrian Regulator complements the national legal framework by requiring **energy bills to mention the following elements**:

- Overview on the 1st page (e.g. supplier details, billing period info etc.)
- Consumption detail (e.g. detailing calculation method, unit rate kWh, grid charges etc.)
- Information sheet (e.g. containing contract term, consumer rights etc.)
- Labelling (e.g. providing energy source breakdown, % of renewable energy in consumption etc.)

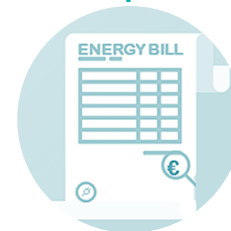
According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Frequency of billing
- Payment methods

The **bills** analysed (sample of 5 example bills) provide usually information on the following elements:

- Details of the supplier
- Tariff name
- Duration of the contract
- Customer data
- Consumption comparison to the previous year
- Dates of the meter readings
- Total price and price breakdown
- Environmental impact of the energy
- Source of the energy
- Supplier's logo

2 out of the 5 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 5 example bills)





EU and national Regulatory Framework

AUSTRIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Green Electricity Act 75/2011 as last amended by Act 108/2017 of 14/09/2017

On the promotion of the generation of green electricity in plants in Austria in line with the principles of European Union law, and the ensuring that green electricity production is energy efficient

Gas Act 107/2011 as last amended by Act 108/2017 of 14/09/2017

On the provisions for the production, transmission, purchase and distribution of goods, supply of natural gas and the organization of the natural gas industry, and natural gas companies

Electricity Act 110/2010 as last amended by Act 108/2017 of 14/09/2017

On the provisions for the production, transmission, purchase and distribution of goods, supply of electricity and the organization of the electricity industry, and electricity companies

E-Control Act 110/2010 as last amended by Act 108/2017 of 14/09/2017

On the definition of the roles and responsibilities of the Austrian energy Regulator E-Control

Energy Efficiency Act 72/2014 of 11/08/2014

On the efficiency of the use of energy by companies and households, to set national targets, to define the role of the Confederation in energy efficiency, to strengthen the demand for energy services as well as the framework conditions for the quality of energy services

Energy Supply Security Act 106/2006 of 27/06/2006

Implements Directive 2005/89/EC among other one

Energy Performance Certificate Act 27/2012 of 20/04/2012

Regulates the duty of the seller or the supplier, on the sale or sale in the case of a building or property being used, the purchaser or the beneficiary of a property, as well as the obligation to provide certain indicators about the energy quality of the building or property to be used in displays to prepare such legal transactions

Distance and Away Shops Act 33/2014 as last amended by Law 50/2017 of 14/02/2017

On the regulations to apply to distance sales and to business premises outside of business premises, contracts (long-distance and outward trade) between entrepreneurs and consumers

Law on Unfair Commercial Practices of 12/12/2007

On the rules on unfair commercial practices in the relationship between businesses and consumers in the Member States. The aim is to facilitate trade in the internal market through a better harmonized right in this area

Consumer Protection Act 140/1979 as last amended by Law 50/2017 of 14/02/2017

ALTERNATIVE DISPUTE RESOLUTION

Law on Alternative Dispute Resolution in Consumer Affairs 105/2015 of 13/08/2015

On the provisions for alternative dispute resolution to be carried out for alternative settlement of disputes over obligations from a contractual contract between an entrepreneur established in Austria and a contracting authority in Austria or in any other Contracting State of the Agreement on the European Economic Area

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | AUSTRIA

Main bodies and contact details

Energy Regulator	Energie-Control Austria Rudolfsplatz 13a, 1010 Wien Website: http://www.e-control.at	
Single Point of Contact	Energie-Control Austria Rudolfsplatz 13a, 1010 Wien Website: http://www.e-control.at	
Price Comparison Tool	E-Control tarifkalkulator Website: http://www.e-control.at/konsumenten/service-und-beratung/toolbox/tarifkalkulator	Durchblicker Website: http://durchblicker.at/strom
	Die Geldmarie Website: http://www.geldmarie.at/energiesparen/strompreis-vergleichen.html	StromGas24 Website: http://www.stromgas24.at
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Austrian Federal Chancellery Ballhauspl. 2, 1010 Vienna Website: http://www.bka.gv.at	
Body with responsibilities relating to competition	Austrian Competition Authority Praterstrabe 31 (Galaxy Tower), A-1020 Vienna Website: http://www.en.bwb.gv.at/Seiten/default.aspx	
Alternative Dispute Resolution Entity	E-control Schlichtungsstelle Schlichtungsstelle, Rudolfsplatz 13a, 1010 Wien Website: http://www.e-control.at/web/website	
Other relevant bodies and consumer organisations	Verein für Konsumenteninformation (VKI)/ Austrian Consumer's Association Linke Wienzeile 18 - 1060 Vienna Website: http://vki.at	



COUNTRY FICHE

BELGIUM



Key take-aways

This section presents a general summary of the key observations for Belgium on the topics highlighted below



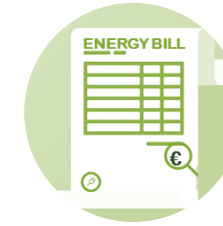
Pre-contractual Information Offers

- The offers are presented most of the time in French and Dutch and sometimes in English
- On average, 94 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 94 tariffs, 26 household electricity offers, 24 household natural gas offers and 22 household mix electricity and gas offers, 20 '100% green offers' and 2 self-generation tariffs are offered
- 6 out of 6 suppliers provide detailed information regarding renewable energy sources on their website, based on a sample of 6 suppliers
- The Code of economic regulation of the 29/02/2013, Art. VI.2 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers



Price Comparison Tools

- There are 10 Price Comparison tools in Belgium in total (sample of 5 PCTs studied)
- 5 out of 5 PCTs studied are privately owned, 2 are certified by the Commission de Régulation de l'Electricité et du Gaz (CREG)
- The CREG published the 'Charter of good practices for the websites of comparison of electricity and gas prices for residential consumers and SMEs' on July 2013***
- 1 out of 5 PCTs clearly state on their websites to cover 100% of the energy market in Belgium in terms of energy suppliers and available offers, based on a sample of 5 PCTs



Energy Bills

- The Law of 29/04/1999 'Loi relative à l'organisation du marché de l'électricité' and the Law of 12/05/1965 regulate the energy bills for electricity and gas suppliers
- The Law of 29/04/1999 Art.18 and the Law of 12/05/1965 regulate billing frequency



*CWAPE, 'Changer de fournisseur' page: <http://www.cwape.be/?dir=2.1.05>
 **BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf
 ***CREG, July 2013, the 'Charter of good practices for the websites of comparison of electricity and gas prices for residential consumers and SMEs': http://www.creg.be/sites/default/files/assets/Varia/charte_bonnes_pratiques.pdf



Pre-contractual Information

General overview



The offers are presented in French, Dutch and sometimes in English



94

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



5 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

The Code of economic regulation of the 29/02/2013, Art. VI.2 states that before a consumer is bound by a contract other than a distance contract or an off-premises contract, or by an agreement referred to in Article VI. 66, the company shall provide the consumer with the following information in a clear and understandable manner, if that information is not clear from the context:

- Main characteristics of the goods/services
- Supplier's contact details
- Total price of the goods/services (incl. taxes)
- Duration of the contract
- Contract termination conditions
- Arrangements for payment and delivery

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **26 household electricity offers**, **24 household natural gas offers** and **22 household mix electricity and gas offers**
- 6 out of 6 energy suppliers offer **20 '100% green offers' in total** (2 suppliers offer 2 green offers each, 2 suppliers offer 3 green offers each, 1 supplier offers 4 green offers and 1 supplier offers 6 green offers)
- 2 out of 6 energy suppliers offer **2 self-generation offers in total** (2 suppliers offer 2 self-generation offers each)

Bundled offers

3 out of 6 energy suppliers studied offer **9 bundled services** (1 energy supplier offers 1 bundled service, 1 energy supplier offers 2 bundled service and 1 energy supplier offers 6 bundled service)

Source: National Regulator Survey

National authorities responsible for enforcement of consumer protection legislation

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

According to the Electricity Law 29/04/1999, Art. 18, §2/3:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 1 month
- Contract termination is free of charge

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 6 out of 6 suppliers studied **provide information regarding switching on their website**



Initiatives, non-binding measures and guidance documents

The Commission de Régulation de l'Electricité et du Gaz published practical guides aiming at helping customers understand the procedure of switching energy suppliers**

A consumer organisation (Test Achats) conducted a collective switching campaign***

**CWAPE, 'Changer de fournisseur' page: <http://www.cwape.be/?dir=2.1.05>

***BEUC, The European Consumer Organisation, Collective energy switch:

http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf





Price Comparison Tools (PCTs)

General overview



10

There are 10 Price Comparison tools in Belgium (sample of 5 PCTs studied)



5 out of 5 PCTs studied are privately owned, 2 are certified by the Commission de Régulation de l'Electricité et du Gaz (CREG)



The CREG published the 'Charter of good practices for the websites of comparison of electricity and gas prices for residential consumers and SMEs' on July 2013*



1 out of 5

PCTs clearly state on their websites to cover 100% of the energy market in Belgium in terms of energy suppliers and available offers, based on a sample of 5 PCTs

Market coverage

Out of 5 privately owned PCTs studied:

- 1 PCT covers 100% of the energy market in terms of suppliers and offers
- 1 PCT covers 100% of the energy market in terms of suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT covers 22 suppliers and 202 offers
- 1 PCT covers 21 suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 5 out of 5 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 2 out of 5 PCTs studied display information as regards the **source of data** presented on their websites
- 5 out of 5 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 5 out of 5 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 5 PCTs studied explain **how often data** presented on their websites **is being updated**
- 1 out of 5 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 4 out of 5 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria**:

At a minimum

- Discount
- Energy mix
- Supplier
- Length of the contract

In addition***

- Fix/Variable tariffs
- Customer service type
- Domiciliation

The **first results pages***** on the PCT websites show per offer at a minimum:

- Supplier details
- Product name
- Duration of contract
- Energy source
- Price
- Discounts

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions including contract termination conditions
- Payment methods
- % of green energy

In addition***

- Additional services
- Quality of service
- 100% Online tariff

**Based on a sample of 6 PCTs

***In addition, some websites include other non-price elements, criteria and details

Source: National Regulator Survey

National authorities responsible for enforcement of consumer protection legislation

Sample Review performed by Deloitte on 5 Price Comparison Tools

*CREG, July 2013, the 'Charter of good practices for the websites of comparison of electricity and gas prices for residential consumers and SMEs':

http://www.creg.be/sites/default/files/assets/Varia/charte_bonnes_pratiques.pdf



Energy Bills

General overview



2 out of 6

Energy suppliers explain the content of their bills on their website



2 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



1 out of 2

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 2 example bills)

Legal requirements

According to the Law of 29/04/1999 'Loi relative à l'organisation du marché de l'électricité' and the Law of 12/05/1965, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The name and address of the energy supplier
- The e-mail address, telephone and fax numbers of the energy provider's customer service department
- The address, telephone and fax numbers of the mediation department of the Regulatory Commission for Electricity and Gas
- The period covered by the bill
- The amounts charged
- The VAT rate and the amount of VAT
- The number of units consumed
- The unit price(s)
- Detailed calculation of the amount payable
- The tariff applicable to transmission and distribution
- The deductions made by all public authorities, grouped according to category
- Changes in consumption in the three preceding years in energy unit by unit price and the total
- The hyperlink towards the official tariff comparison tool of the competent regional regulator
- The type of primary energy sources used from the electricity provided, calculated as an annual average of the previous year

Content

The Belgium Regulator CREG complements the national legal framework by requiring suppliers **to mention the following elements on energy bills:**

- Customer data
- Data related to the point of supply
- Energy suppliers data
- Data related on the distribution system operator
- Billing data
- Detailed amount invoice per type of energy
- Complaint handling
- Outstanding balance
- Contract information
- Diverse mentions per type of energy
- Link to PCT

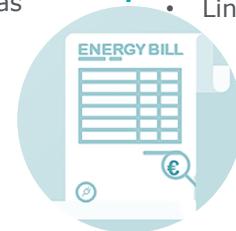
The Belgium Directorate-General Economic regulation (consumer protection and market regulation) published the "**Customer in the free electricity and gas market agreement**" with the energy suppliers protecting the consumers against possible excessive practices or misleading information including content provided on the energy bills**

Frequency of consumption statement

The Law of 29/04/1999 Art.18 and Law of 12/05/1965 ensure that the consumers receive **at least one annual statement** presenting their consumption



Source: National Regulator Survey
National authorities responsible for enforcement of consumer protection legislation
Sample Review performed by Deloitte on 6 energy suppliers



The **bills** analysed (sample of 2 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Customer data
- Information on the electricity consumption
- Total price
- Price breakdown
- Claims and customer service

1 out of the 2 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 2 example bills)

**Agreement: http://economie.fgov.be/fr/binaries/accord_electricity_fr_tcm326-41209.pdf





EU and national Regulatory Framework BELGIUM LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Code of economic regulation of the 29/02/2013

Codifying all existing economic law into one national Code of Economic law

APPLICABLE NATIONAL LAWS

Law of 29/04/1999 amended the 09/08/2017

On the organisation of the electricity market

Law of 21/12/2013

Act insertion of Title VI "Market Practices and Consumer Protection" in the Code of Economic Law

Law of 01/06/2005 amending the law of 29/04/1999

On the organization of the electricity market

Law of 12/04/1965 amended 14/06/2005

Concerning the transport of gas like products

Flemish Decree of 08/05/2009

On general rules applicable to energy policy Walloon Decree of 12th April 2001 related to the organization of the regional electricity market

Brussels Decree of 19/07/2001

Related to the organization of the regional electricity market

Walloon Decree of 12/04/2001

Related to the organisation of the regional electricity market

ALTERNATIVE DISPUTE RESOLUTION

Code of economic regulation of the 29/02/2013

Codifying all existing economic law into one national Code of Economic law

SOFT LAWS

Consumer Agreement, Consumers and Economy Ministry

Concerning the consumer in the free electricity - and gas market.

This Agreement is only binding for the energy suppliers who have signed it (95% of all energy suppliers). The first Agreement was signed in 2004. Later versions were signed in 2006, 2013 and 2017. For those who have signed the Agreement but do not observe the regulations the Agreement provides that non observance will be considered as an unfair commercial practice

Good practice charter for PCTS

Description of do's and don'ts for PCTS

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law

Source: Former Deloitte study on European energy regulations

National authorities responsible for enforcement of consumer protection legislation

http://economie.fgov.be/fr/consommateurs/Energie/Electricite/Liberalisation_marche_electricite/#.WcPQ48gjGUm



NOTES | BELGIUM

Main bodies and contact details

Energy Regulator	Federal Regulator CREG (Commission de Régulation de l'Electricité et du Gaz / Commissie voor de Regulering van de Elektriciteit en het Gas) Rue de l'Industrie 26-38 1040 Bruxelles Website: http://www.creg.be/fr	
Single Point of Contact	Service de Médiation de l'Energie/Ombudsdienst voor Energie Rue Royale 47 1000 Bruxelles Website: http://http://www.mediateurenergie.be/fr	
Price Comparison Tools	Comparateur-Energie.be Website : http://www.comparateur-energie.be/	Kill My Bill Website: http://www.killmybill.be/
	Mesfournisseurs.be Website: http://www.mesfournisseurs.be/energie/fournisseurs	testachats.be Website: http://www.test-achats.be/
	Mon Energie Website: http://www.monenergie.be/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	SPF Economie, P.M.E., Classes moyennes et Energie/FOD Economie, K.M.O., Middenstand en Energie Rue du Progrès 50 1210 Bruxelles Website: http://www.economie.fgov.be	
Body with responsibilities relating to competition	Autorité belge de la Concurrence/Belgische mededingingsautoriteit City Atrium - Rue du Progrès 50 1210 Bruxelles Website: http://www.abc-bma.be/fr	
Alternative Dispute Resolution Entity	Service de Médiation de l'Energie/Ombudsdienst voor Energie	
Other relevant bodies and consumer organisations	Test Achats/Test-Aankoop Rue de Hollande 13 1060 Bruxelles Website: http://www.test-achats.be/	



COUNTRY FICHE

BULGARIA



Key take-aways

This section presents a general summary of the key observations for Bulgaria on the topics highlighted below



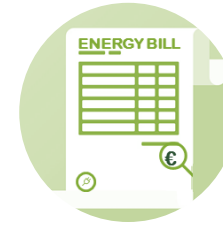
Pre-contractual Information Offers

- The offers are presented most of the time in Bulgarian and sometimes in English
- On average, 5 tariffs are offered on the energy suppliers' websites, based on a sample of 4 suppliers
- Out of these 5 tariffs, 5 household electricity offers, 0 household natural gas offers, 0 household mix electricity and gas offers, 0 '100% green offers' and 0 self-generation tariffs are offered
- 0 out of 4 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 4 suppliers
- The Consumer Protection Act, Art. 4 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers



Price Comparison Tools

- There are no Price Comparison tools for the energy market in Bulgaria
- Switching and contract termination is free of charge as ensured by the Energy Act, 09/12/2003 Art. 38a, 38b and 95(2)/(3)



Energy Bills

- The Energy Act, Art. 38b and Art. 4 of the 'Consumer Protection Act' regulates the energy bills for electricity and gas suppliers and the payment methods
- The Energy Act, Art. 38b and Art. 4 of the 'Consumer Protection Act' ensures that the consumers receive at least 4 quarterly statements presenting their consumption





Pre-contractual Information

General overview



The offers are presented in Bulgarian and sometimes in English



5

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 4 suppliers



0 out of 4

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 4 suppliers



No fees are applied for switching and contract termination, based on the analysed sample of 4 suppliers

Legal requirements

The Consumer Protection Act, Art. 4 states that prior to the acquisition of a product or the use of a service, a trader shall be obligated to provide consumers with adequate information enabling them to make a choice. This information shall include:

- All characteristics of the product or service which must be known to the consumer, including the composition, packaging, as well as instructions for use, assembly, and maintenance
- Price, quantity, method of payment and other contractual terms
- The dangers related to the customary use, application or maintenance of the product or service
- The conditions for use of the product or service; its impact on other products and services if applied or used together with such other products or services
- Conditions and period of the guarantee
- The date of minimum durability of the product

Offers and green energy offers studied

- The 4 energy suppliers offer a total of **5 household electricity offers**, **0 household natural gas offers** and **0 household mix electricity and gas offers**
- 0 out of 4 energy suppliers offer **'100% green offers'**
- 0 out of 4 energy suppliers offer **self-generation offers**

Bundled offers

0 out of 4 energy suppliers studied offer **bundled services**



Switching fees and contract termination fees

According to the Energy Act, 09/12/2003 Art. 38a, 38b and 95(2)/(3):

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge
- Contract termination is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination

Practices in the energy market in relation to switching

- 0 out of 4 suppliers studied **apply switching fees**
- 1 out of 4 suppliers studied **provide information regarding switching on their website**





Price Comparison Tools (PCTs)

General overview



There are no Price Comparison tools in Bulgaria



Energy Bills

General overview



2 out of 4

Energy suppliers explain the content of their bills on their website



2 out of 4

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 2

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 2 example bills)

Legal requirements

The Energy Act, Art. 38b and Art. 4 of the 'Consumer Protection Act' regulate the energy bills for electricity and gas suppliers and the payment methods. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Ways of payment, disconnection and reconnection rates, charges for maintenance services, and charges for other services related to the licensed activity
- Actually consumed quantities and the cost of the provided service in compliance with the contracted reporting frequency without any obligation for additional payment for this service
- Existing sources where information on the environmental impact, in terms of at least CO2 emissions and the radioactive waste resulting from the electricity produced by different energy sources in the overall energy supplied by the supplier over the preceding year is publicly available
- Procedure for switching to a new supplier and information that energy service customers do not owe additional charge for said switching, (5) drawing up of final closure account in the event of each switching of supplier
- Share of each energy source in the total energy supplied by the supplier during the previous calendar year in a comprehensible and clearly comparable manner
- Information about the means for settlement of disputes
- Frequency of billing

Content

The **bills** analysed (sample of 2 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Type of meter
- Price breakdown
- Tariff name
- Customer data
- Information on consumption
- Current price of energy

0 out of the 2 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 2 example bills)



Frequency of consumption statement

The Energy Act, Art. 38b and Art. 4 of the 'Consumer Protection Act' ensures that the consumers receive at least **4 quarterly statements** presenting their consumption





EU and national Regulatory Framework BULGARIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Energy Efficiency Act, 12/03/2013

Ordinance № РД-16-869, 02/08/2011

For the calculation of the total share of the energy from renewable sources in the gross final energy consumption and the consumption of biofuels and energy from renewable sources in transport

Law on Renewable Energy, 10/12/2010

Ordinance № РД-16-346, 02/04/2009

On the energy consumption indicators, the energy performance of industrial systems, the terms and conditions for conducting energy efficiency audits of industrial systems

Consumer Protection Act, 07/08/2007

Energy Act, 09/12/2003

ALTERNATIVE DISPUTE RESOLUTION

Consumer Protection Act "Закон за защита на потребителите" 28/07/2015

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

Electricity Trading Rules (ETR) 07/2013

Document introducing a market for the balancing energy

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

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Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | BULGARIA

Main bodies and contact details

Energy Regulator	State Energy and Water Regulatory Commission (SEWRC) Dondukov 8-10 – 1000 Sofia Website: http://www.dker.bg/en/home	
Single Point of Contact	Commission for Consumer Protection Slaveykov Sqr., BG-1000 Sofia Website: http://www.ktzb.bg	
Price Comparison Tools	Not applicable	
	Commission for Consumer Protection 4A, Slaveykov Sqr., BG – 1000 Sofia Website: http://ktzb.bg	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Commission for Consumer Protection	
Body with responsibilities relating to competition	Commission for Protection of Competition 18, Vitosha Blvd. 1000 Sofia Website: http://www.cpc.bg/Default.aspx	
Alternative Dispute Resolution Entity	State Energy and Water Regulatory Commission (SEWRC)	Commission for Consumer Protection
Other relevant bodies and consumer organisations	Bulgarian National Consumer Association 26 Vrabcha Str., BU – 1504 Sofia Website: http://www.aktivnipotrbiteli.bg	



COUNTRY FICHE

CROATIA

Key take-aways

This section presents a general summary of the key observations for Croatia on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Croatian and sometimes in English
- On average, 11 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 11 tariffs, 5 household electricity offers, 3 household natural gas offers, 0 household mix electricity and gas offers, 1 '100% green offers' and 2 self-generation tariffs are offered
- 0 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Electricity Market Act, Art. 62 & 63 and the Gas Market Act, Art. 61 regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

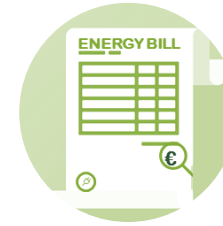
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Electricity Act 2010, Art. 76 and the Gas Act 2011, Art. 123
- There are no requirements included in the national legislation on contract termination fees
- The Regulator Hrvatska energetska Regulatorna agencija (HERA) published information on switching procedures on its website*



Price Comparison Tools

- There are 4 Price Comparison Tools in Croatia in total (sample of 4 PCTs studied)
- 1 out of 4 PCTs studied is owned by the national Regulator (HERA) and 3 out of 4 PCTs studied are privately owned
- There is no certification body nor scheme in Croatia
- 0 out of 4 PCTs clearly state on their websites to cover 100% of the energy market in Croatia in terms of energy suppliers and available offers, based on a sample of 4 PCTs



Energy Bills

- The Electricity Act 2010, Art. 81 and the Gas Act 2011, Art. 126 regulate the energy bills for electricity and gas suppliers
- The Energy Efficiency Act, Art. 14 & 18 regulates billing frequency





Pre-contractual Information

General overview



The offers are presented in Croatian and sometimes English



11

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



0 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements

According to the Electricity Market Act, Art. 62 & 63 and the Gas Market Act, Art. 61 the provisions of the contract to end-consumers must be fair and shall include, in a clear, simple and unambiguous manner, the rights and obligations of the supplier and the buyer. Each supplier shall ensure that their end-user conditions are well known in advance. Terms of contract notice to final customers should be provided prior to its conclusion. The terms of the contract must be written in a clear and comprehensible way. Each supplier must ensure that end-customers are protected from unfair and misleading purchasing

Each supplier is obliged to conclude a supply contract with the final buyer in writing. The end-consumer's contract must contain at least the following:

- Identity and address of the supplier
- Services provided by the supplier
- Types of maintenance services offered
- How to get information on prices and fees including maintenance fees
- Contract duration
- Conditions for renewal
- Termination conditions and existence of rights to terminate the contract
- Complaints handling procedures
- Possible payment methods

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **5 household electricity offers, 3 household natural gas offers** but **no household mix electricity and gas offers** in the country
- 1 out of 6 energy supplier offers **1 '100% green offer' in total**
- 2 out of 6 energy suppliers offers **2 self-generation offers in total** (2 energy suppliers offer 1 self-generation offer each)

Bundled offers

0 out of 6 energy suppliers offer **bundled services**

Source: National Regulator HERA Survey
Sample Review performed by Deloitte on 6 energy suppliers



Switching fees and contract termination fees

According to the Electricity Act 2010, Art. 76 and the Gas Act 2011, Art. 123:

- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching after the consumer's request
- Timeframe within which the supplier must apply the contract termination
- Contract termination fee

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 4 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Regulator HERA published information on switching procedures on its website**



**HERA, 'Informacije za kupce električne energije iz kategorije kućanstvo' guide:
https://www.hera.hr/hr/docs/odgovori_KEKK.pdf



Price Comparison Tools (PCTs)

General overview



4

There are 4 Price Comparison Tools in Croatia (sample of 4 PCTs studied)



1 out of 4 PCTs studied is owned by the national Regulator (HERA) and 3 out of 4 PCTs studied are privately owned



There is no accreditation body nor scheme in Croatia



0 out of 4

PCTs clearly state on their websites to cover 100% of the energy market in Croatia in terms of energy suppliers and available offers, based on a sample of 4 PCTs

Market coverage

Out of 1 PCT owned by the national Regulator:

- 1 PCT covers 7 suppliers and does not clearly indicate its market coverage in terms of offers

Out of 3 privately owned PCTs studied:

- 1 PCT covers 100% of the energy market in terms of supplier sand does not clearly indicate its market coverage in terms of offers
- 2 PCTs do not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 2 out of 4 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 4 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 4 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 2 out of 4 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 4 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 4 PCTs studied give consumers **the possibility to give their review of their websites**
- 0 out of 4 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Whether the consumer has to read the meters himself and inform the supplier on his consumption
- Indication whether contract can be agreed upon online (100% online)
- Contract duration

The **first results pages**** on the PCT websites show per offer at a minimum:

- | | |
|------------------------|---|
| • Supplier | • Price |
| • Product name | • Information on amount that can be saved |
| • Duration of contract | |



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions
- Early contract termination fee
- Billing format

*Based on a sample of 4 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



2 out of 6

Energy suppliers explain the content of their bills on their website



2 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 2

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements

The Energy Efficiency Act 127/14 of 23/10/2014, Art. 14 & 18 regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Actual prices and consumption of energy
- Comparison with last year data, ideally graphical
- Information on switching
- Bill layout
- Contact information, energy agencies or similar bodies, including the addresses of web pages, where there is information on available measures to improve energy efficiency, comparable profiles of end users and objective technical specifications of equipment that uses energy

Content

According to the Croatian Regulator HERA, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Payment methods
- Media used

The **bills** analysed (sample of 4 example bills) usually provide at a minimum information on the following elements:

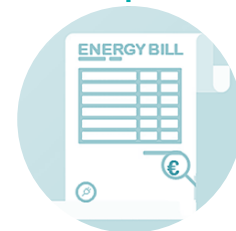
- Supplier's logo
- Details of the contract
- Information on consumption
- Summary of the bill
- Customer data
- Switching code
- Dates of the meter readings
- Type of meter
- Total price
- Price breakdown
- Environmental impact of the energy
- Customer information website addresses



Frequency of consumption statement

The Energy Efficiency Act, Art. 14 ensures that the consumers receive **a yearly energy bill** presenting their consumption and cost with a comparative graphical representation with last year consumption

The Energy Efficiency Act, Art. 18 ensures that billing information are provided to end customers **twice a year**, or at the request of the end customer must be delivered or sent in electronic form at least every three months



0 out of the 2 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 2 example bills)





EU and national Regulatory Framework

CROATIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

General Conditions for Use of the Network and Electricity Supply 85/15 of 23/07/2015

On contract terms and conditions, obligations of suppliers and users, switching procedures, consumption and tariffs, measurement data, metering conditions, protection measures for end customers

Energy Efficiency Act 127/14 of 23/10/2014

On the rules on the area of efficient energy use and implementation of measures to improve efficiency

Energy Act NN 68/2001 as last amended by Law 14/2014 of 28/01/2014

On measures for safe and reliable, its efficiency production and use on the market, and on the regulation of issues and relations that are of common interest for all energy activities

Gas Market Act 28/13 of 28/02/2013

On the rules and measures for safe and reliable production, transport, storage, distribution and gas supply, the organization of the gas market, and customer protection

Electricity Market Act 22/13 of 14/02/2013

On the rules and measures for production, storage and distribution of electricity

Law on Regulation of Energy Activities 120/12 of 25/10/2012

On the establishment and implementation of the energy regulation system, the process of establishing energy Regulatory bodies, and other matters of importance for the regulation of energy activities

Energy Development Strategy 130/09 of 16/10/2009

On the security of energy supply, competitiveness of the energy system and sustainability of energy development

General Conditions for Natural Gas Supply 43/09 of 02/04/2009

On procedure for the distribution or transport system of natural gas, monitoring the quality of service and quality of supply, contracts, calculation methods, collection of natural gas

APPLICABLE NATIONAL REGULATIONS

Regulation on criteria for obtaining status of endangered energy customers from networked systems 95/15 of 03/09/2015

Ordinance on Energy Efficiency Inspection and Energy Certification 48/14 of 01/04/2014

ALTERNATIVE DISPUTE RESOLUTION

Alternative Dispute Resolution Act 121/16 of 15/12/2016

On the alternative settlement of domestic and cross-border disputes arising from a purchase or service contract between traders established in the Republic of Croatia and consumers domiciled in the European Union

SOFT LAWS

Consumer Protection Act 41/14 of 25/03/2014

On the protection of the basic rights of consumers when buying goods and services and in other forms of acquisition of products and services on the market

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | CROATIA

Main bodies and contact details

Energy Regulator	Hrvatska energetska Regulatorna agencija (HERA) / The Croatian Energy Regulatory Agency (CERA) Ulica grada Vukovara 14, 10000 Zagreb Website: http://www.hera.hr	
Single Point of Contact	Ministry of Economy – Consumer Protection Central Information System for Consumer Protection (CISZP) Website: http://potrosac.mingo.hr/hr/potrosac/	
Price Comparison Tool	HERA Website: https://www.hera.hr/hr/tarifni-kalkulator-eek/	Rezije Website: http://www.rezije.hr/
	Udruga Privatus Website: http://projekti.privatus.hr/struja/	Kompare Website: http://kompare.hr/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Ministry of Economy – Energy Sector Ulica grada Vukovara 78, 10 000 Zagreb Website: http://www.mingo.hr/en	
Body with responsibilities relating to competition	Croatian Competition Agency Savska cesta 41/XIV, 10000 Zagreb Website: http://www.aztn.hr/en/	
Alternative Dispute Resolution Entity	HERA	
Other relevant bodies and consumer organisations	Society for Consumer Protection of Croatia "POTROŠAČ" Kneza Lj.Posavskog 48 , 10000 Zagreb Website: http://www.potrosac.hr	European Consumer Centre Croatia Ulica grada Vukovara 78, Zagreb Website: http://europakonsument.at/en/page/croatia-eu



COUNTRY FICHE

CYPRUS



Key take-aways

This section presents a general summary of the key observations for Cyprus on the topics highlighted below



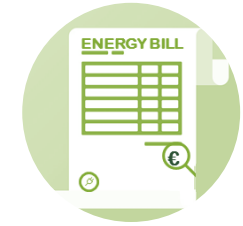
Pre-contractual Information Offers

- The offers are presented in Greek, Turkish and English
- On average, 4 tariffs are offered on the energy suppliers' websites, based on a sample of 1 supplier
- Out of these 4 tariffs, 4 household electricity offers, 0 household natural gas offers, 0 household mix electricity and gas offers, 0 '100% green offers' and 0 self-generation tariffs are offered
- 1 out of 1 supplier provides detailed information regarding renewable energy sources on its website, based on a sample of 1 supplier
- The 211(I)/2012 Electricity Market law, Article 91 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers



Price Comparison Tools

- There are no Price Comparison tools for the energy market in Cyprus
- Switching is free of charge as ensured by the Market in electricity law, 211(I)/2012, Art. 91(1), §1
- There are no requirements included in the national legislation on contract termination fees
- The Cyprus Energy Regulatory Authority published a practical guide aimed at informing customers on their right to switch energy supplier*
- The Electricity Authority of Cyprus is the only authorized electricity supplier in the market in Cyprus (monopoly)



Energy Bills

- The 211(I)/2012 Electricity Market law, Article 91 regulates the energy bills for electricity and gas suppliers and the payment methods
- The 211(I)/2012 Law, Art. 91 regulates billing frequency
- The Cypriot Energy Regulator published practical guide aimed at helping customers understand the content of their energy bill**



*CERA, 2015, ΔΙΚΑΙΩΜΑΤΑ ΤΩΝ ΕΥΡΩΠΑΪΩΝ ΚΑΤΑΝΑΛΩΤΩΝ ενέργειας: http://www.cera.org.cy/Templates/00001/data/katanalwtws/Dikaiwmata_eurwpaion_katanalwtwn.pdf

**Practical guide: http://www.cera.org.cy/Templates/00001/data/katanalwtws/Dikaiwmata_eurwpaion_katanalwtwn.pdf



Pre-contractual Information

General overview



The offers are presented in Greek, Turkish and English



4

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 1 supplier



1 out of 1

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 1 supplier

0€

Not applicable, the Electricity Authority of Cyprus is the only authorized electricity supplier in the market in Cyprus (monopoly)

Legal requirements

According to the 211(I)/2012 Electricity Market law, Article 91, consumers have the right to receive the following information from suppliers on their accounts and advertising material:

- The contribution of each energy source in the fuel mix of each supplier in the previous year
- The reference to sources where public information is available regarding environmental effects of CO2 and waste resulting from the supplier's last year's production of energy
- Information on the rights of clients and dispute settlement procedures
- Ways to optimise the customer's use of power to promote energy efficiency

Offers and green energy offers studied

- The energy supplier offer a total of **4 household electricity offers, 0 household natural gas offers** and **0 household mix electricity and gas offers**
- 0 out of 1 energy supplier offers '**100% green offers**'
- 0 out of 1 energy supplier offers **self-generation offers**

Bundled offers

0 out of 1 energy supplier studied offers **bundled services**



Switching fees and contract termination fees

According to the Market in electricity law, 211(I)/2012, Art. 91(1), §1:

- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching after the consumer's request
- Timeframe within which the supplier must apply the contract termination
- Contract termination fee

Initiatives, non-binding measures and guidance documents

The Cyprus Energy Regulatory Authority published a practical guide aimed at informing customers on their right to switch energy supplier**





Price Comparison Tools (PCTs)

General overview



There are no Price Comparison tools available in Cyprus



Energy Bills

General overview



1 out of 1

Energy supplier explains the content of its bills on its website



1 out of 1

Energy supplier provides an explanation of the price breakdown on its website



Not applicable, the Electricity Authority of Cyprus is the only authorized electricity supplier in the market in Cyprus (monopoly)

Legal requirements

The 211(I)/2012 Electricity Market law, Article 91 regulates the energy bills for electricity and gas suppliers and the payment methods

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The fuel mix
- Websites providing information on environmental impact of energy
- Ways to optimise the use of electricity
- Actual consumption
- Cost of electricity

Frequency of consumption statement

The 211(I)/2012 Law, Art. 91 ensures that consumers receive "quite often" statements presenting their consumption

Content

The Cypriot Regulator (Cyprus Energy Regulatory Authority) complements the national legal framework by requiring suppliers **to mention the following elements on energy bills:**

- Total price of electricity
- Price breakdown
- Margin of supplier to enable consumers to compare supplier's offers
- Energy consumption for at least the previous 2 years

The **bills** analysed (sample of 1 example bill) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Type of meter
- Claims and customer services contact details
- Customer data
- Details of the contract
- Dates of the meter readings
- Price breakdown



Initiatives, non-binding measures and guidance documents

The Cypriot Energy Regulator published **practical guide** aimed at helping customers understand the content of their energy bill*



*Practical guide:

http://www.cera.org.cy/Templates/00001/data/katanalwtes/Dikaiwmata_eurwpaion_katanalwtwn.pdf





EU and national Regulatory Framework CYPRIOT LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

The Conditions of Sale of Goods at Discount Prices, 2016

Regulatory Decision No 2/2015, 19/06/2015
Statement of Regulatory practice and methodology of electricity tariffs

The About Defective Terms in Consumer Contracts Law, 2014

The Consumer Rights Law, 2013

The Petroleum and Fuel Specification Law, 2013

Regulation of 18/04/2012
Ministerial order about energy billing

National Energy Efficiency Program, 2012

Regulation of 31/08/2010
Concerning the setting of the transitional market-adjusted regulated tariff level

The Promotion of the Use of Biofuels or Other Renewable Fuels for Transport Law, 2010

The Gasoline, Diesel and Biodiesel Specification, 2009

About The Control of Misleading and Serious Advertising Law, 2007

The Unfair Commercial Practices of Businesses to Consumers Law, 2007

The Natural Gas Market Regulation Law, 2004

The Promotion and Encouragement of the Use of Renewable Energy Sources and Energy Saving Law, 2003

The Electricity Market Regulation Law, 2003

The Unfair Terms in Consumer Contracts Law, 1999

ALTERNATIVE DISPUTE RESOLUTION

Judicial Decrees for the Protection of Collective Interests of Consumers, 07/07/2017
The Alternative Consumer Dispute Resolution of 2017

Out-of-court Settlement of Consumer Claims, 23/10/2015
Arbitration Law of 2015
Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

Practical guide on consumer rights (in relation to energy bills, information about the contract, etc.)

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | CYPRUS

Main bodies and contact details

Energy Regulator	Cyprus Energy Regulatory Authority (CERA) Griva Digeni Avenue 81-83 Iakovidí Building 3rd Floor 1080 Nicosia Website: http://cera.org.cy	
Single Point of Contact	Cyprus Energy Regulatory Authority (CERA)	
Price Comparison Tools	Not applicable	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Ministry of Energy, Commerce, Industry and Tourism CY-1421, Lefkosia (Nicosia) Website: http://mcit.gov.cy	
Body with responsibilities relating to competition	Competition and Consumer Protection Service (Ministry of Energy, Commerce Industry and Tourism) 1421 Lefkosia (Nicosia), Cyprus Website: http://www.mcit.gov.cy/mcit/cyco/cyconsumer.nsf/page05_en/page05_en?OpenDocument	
Alternative Dispute Resolution Entity	Competition and Consumer Protection Service (Ministry of Energy, Commerce Industry and Tourism)	
Other relevant bodies and consumer organisations	The Cyprus Consumers Association P.o. box 24874, 1304 Nicosia Website: http://www.cyprusconsumers.org.cy	Cyprus Consumers’ Union & Quality of Life 169, Athalassas Avenue, 2015 Strovolos Website: http://www.consumersunion.org.cy



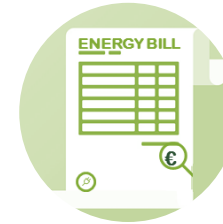
COUNTRY FICHE

CZECH REPUBLIC



Key take-aways

This section presents a general summary of the key observations for Czech Republic on the topics highlighted below



Pre-contractual Information Offers

Switching fees & Contract termination fees

Price Comparison Tools

Energy Bills

- The offers are presented most of the time in Czech and sometimes in English
- On average, 43 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 43 tariffs, 22 household electricity offers, 19 household natural gas offers, 0 household mix electricity and gas offers, 2 '100% green offers' and 0 self-generation tariffs are offered
- 1 out of 6 supplier provides information regarding renewable energy sources on its website, based on a sample of 6 suppliers
- The Energy Act 210/2011 Coll. Act, Art. 50 regulates the minimum requirements regarding the content of offers presented to consumers

- Switching is free of charge as ensured by the Energy Act, 458/2000 Coll., 28/02/2005, Art. 28
- There are no requirements included in the national legislation on contract termination fees
- The Energy Regulator Office or ERU published a practical and interactive guide aimed at helping customers understand the procedure of switching energy suppliers*
- A consumer organisation (dTest) conducted a collective switching campaign**

- There are 9 Price Comparison tools in Czech Republic in total (sample of 5 PCTs studied)
- 1 out of 5 PCTs studied is owned by the national Regulator and 4 out of 5 PCTs studied are privately owned
- There is no certification body nor scheme in Czech Republic
- 0 out of 5 PCTs clearly state on their websites to cover 100% of the energy market in Czech Republic in terms of energy suppliers and available offers, based on a sample of 5 PCTs

- The Energy Act 210/2011 Coll. Act regulates the energy bills for electricity and gas suppliers, the payment methods and the conditions of reimbursements of overpayment



*ERU, 'Často kladené dotazy' (Accessed: 11.2017): <https://www.eru.cz/cs/elektrina/casto-kladene-dotazy#4>
 **BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Pre-contractual Information

General overview



The offers are presented in Czech and sometimes in English



43

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



1 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

The national legal framework does not include minimum requirements on pre-contractual information

According to the Energy Act 210/2011 Coll. Act, Art. 50, the contract for the supply of electricity with a customer must contain:

- A list of connection points
- Methods of payment for electricity supplies
- The length of the notice period, no longer than three months, starting on the first day of the calendar month following the delivery of the notice if it is a contract of indefinite duration
- Permission to the customer to terminate the contract in case of default of contractual obligations by the supplier or in case of disagreement with the proposed contract terms changes
- Ways of informing the customer about the proposed change in the contract terms and customer instructions on the right of withdrawal in case of disagreement with the proposed contract terms changes
- The commitment period

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **22 household electricity offers**, **19 household natural gas offers** and **0 household mix electricity and gas offers**
- 2 out of 6 energy suppliers offer **2 '100% green offers' in total** (2 energy suppliers offer each 1 green offer)
- 0 out of 6 energy suppliers offer **self-generation offers**

Bundled offers

0 out of 6 energy suppliers studied offer **bundled services**

Sample Review performed by Deloitte on 6 energy suppliers

**Covers only an extract of the national legal requirements. Details can be found in the draft final report*



Switching fees and contract termination fees

According to the Energy Act, 458/2000 Coll., 28/02/2005:

- Switching is free of charge (Art. 28)

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching after the consumer's request
- Timeframe within which the supplier must apply the contract termination
- Contract termination fee

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 5 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Energy Regulator Office published a practical and interactive guide aimed at helping customers understand the procedure of switching energy suppliers**

A consumer organisation (dTest) conducted a collective switching campaign***




**ERU, 'Často kladené dotazy' (Accessed: 11.2017): <https://www.eru.cz/cs/elektrina/casto-kladene-dotazy#4>


***BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf





Price Comparison Tools (PCTs)

General overview

9
 There are 9 Price Comparison tools in Czech Republic (sample of 5 PCTs studied)

 1 out of 5 PCTs studied is owned by the national Regulator and 4 out of 5 PCTs studied are privately owned

 There is no accreditation body nor scheme in Czech Republic

0 out of 5
 PCTs clearly state on their websites to cover 100% of the energy market in Czech Republic in terms of energy suppliers and available offers, based on a sample of 5 PCTs

Market coverage

Out of 1 PCT owned by the national Regulator:

- The market coverage in terms of energy suppliers and offers is not clearly indicated

Out of 4 private PCTs studied:

- 1 PCT covers all the suppliers with more than 100 clients
- 3 PCTs do not clearly indicate their market coverage in terms of offers and suppliers

Business model

- 2 out of 5 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 5 PCTs studied display information as regards the **source of data** presented on their websites
- 4 out of 5 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 0 out of 5 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 5 PCTs studied explain **how often data** presented on the website **is being updated**
- 0 out of 5 PCTs studied give consumers **the possibility to give their review of their websites**
- 0 out of 5 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- 100% green energy
- Contract duration

In addition**

- 100% online offer

The **first results pages**** on the PCT websites show per offer at a minimum:

- Supplier
- Product name
- Contract duration

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions
- Contract termination conditions

In addition**

- Fee structure
- Discounts





Energy Bills

General overview



3 out of 6

Energy suppliers explain the content of their bills on their website



3 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



3 out of 3

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 3 example bills)

Legal requirements*

The Energy Act 210/2011 Coll. Act Regulates the energy bills for electricity and gas suppliers, the payment methods and the conditions of reimbursements of overpayment. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Energy mix
- Websites providing information on environmental impact of energy
- Customer service contact details
- Complaint handling procedures
- Contact information, energy agencies or similar bodies, including the addresses of web pages

Frequency of consumption statement

The 210/2011 Coll. Act ensures that the consumers receive at least **one annual statement** presenting their consumption

Content

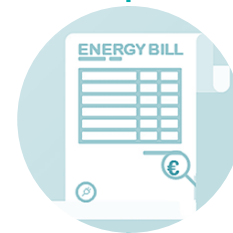
The Energy Regulator Office does not complement the national legal framework by requiring **energy bills to mention additional elements**

The Regulator does not mention **aspects of energy bills**, consumers can ask the **energy suppliers to amend**

The **bills** analysed (sample of 3 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Type of meter
- Contract details
- Customer data
- Information on the consumption
- Dates of the meter readings
- Price breakdown
- Energy origin

3 out of the 3 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 3 example bills)



Source: National Regulator CRE Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report





EU and national Regulatory Framework

CZECH LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Decree No. 309/2016

On energy audit and energy review

Decree No. 37/2016 Coll.

On electricity from high efficiency cogeneration of electricity and heat and electricity from secondary sources

Government Ordinance No. 363/2013 Coll.

On exemplary instruction on the right to withdraw from distance and off-premises contracts and a template for withdrawal from these contracts

Supported Energy Sources Act, 2012

The Energy Act 210/2011 Coll.

Act No. 36/2008 Coll.

On the regulation of advertising and amending

Act No. 458/2000 Coll.

On business conditions and on the exercise of state administration in energy sectors

Energy Act, 2000

Energy Management Act, 2000

ALTERNATIVE DISPUTE RESOLUTION

Act No. 277/2003 Coll., General Product Safety

Act No. 634/1992, Consumer Protection

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

Q&A guide on switching procedure, published by The Energy Regulator Office (ERO)

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | CZECH REPUBLIC

Main bodies and contact details

Energy Regulator	The Energy Regulator Office (ERO) Masarykovo namesti 5, 586 01 Jihlava Website: http://www.eru.cz/en/	
Single Point of Contact	ERO	
Price Comparison Tools	Ceny Energie Website: http://www.cenyenergie.cz/	Elektrina.cz Website: http://www.elektrina.cz/srovnani-cen-elektriny
	Chytry Odberatel Website: http://www.chytryodberatel.cz/	TZB-Info Website: http://www.kalkulator.tzb-info.cz/
	Mesec Website: http://www.prodej.mesec.cz/energie/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Ministry of Industry and Trade Na Frantisku 32 – 110 15 Praha 1 Website: http://www.mpo.cz	
Body with responsibilities relating to competition	Office for the Protection of Competition (UOHS) Tr. Kpt. Jarose 7 604 55 Brno Czech Republic Website: http://www.compet.cz/en/	
Alternative Dispute Resolution Entity	ERO	Ministry of Industry and Trade
Other relevant bodies and consumer organisations	SOS Sdruzeni obrany spotřebitelu O.S. – Cernomorska 419/10 – 14000 Praha 4 Website: http://www.dtest.cz	Czech Consumer Association Budejovicka 73, CZ – 14000 Praha 4 Website: http://www.konsument.cz



COUNTRY FICHE

DENMARK



Key take-aways

This section presents a general summary of the key observations for Denmark on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in Danish and sometimes in English
- On average 76 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 76 tariffs, 20 household electricity offers, 11 household natural gas offers, 31 household mix electricity and gas offers, 12 '100% green offers' and 2 self-generation tariffs are offered
- 6 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Executive order 1233 from 06/11/2015, Section 2 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

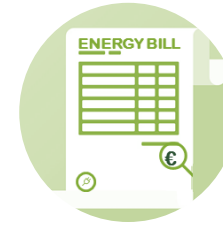


Price Comparison Tools

Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Electricity Supply Act 1329/2013, Chap. 2. §6
- There are no requirements included in the national legislation on contract termination fees
- The Danish Energy Regulatory Authority or DERA provides additional information on switching and contract termination on their website
- A consumer organisation (Forbrugerrådet TÆNK) conducted a collective switching campaign*

- There are 3 Price Comparison tools in Denmark in total (sample of 1 PCT studied)
- 1 out of 1 PCTs studied is privately owned
- There is no certification body nor scheme in Denmark
- 1 out of 1 PCT clearly states on its website to cover 100% of the energy market in Denmark in terms of energy suppliers and available offers, based on a sample of 1 PCT



Energy Bills

- The Executive Order 1400/2015, Sections 2 & 4 and the Statement 937/2006, Sections 3, 5 & 8 regulates the energy bills for electricity and gas suppliers
- The Electricity Supply Act 1329/2013 Section 72a and the Statement 937/2006, Section 4 regulate billing frequency





Pre-contractual Information

General overview



The offers are usually presented in Danish and sometimes in English



76

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



6 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Executive order 1233 from 06/11/2015, Section 2, the contract between the energy supplier and the consumer must be given through a permanent medium and the terms of the contract must be reasonable, transparent and clearly understandable. Information about the conditions prior to the conclusion of the contract must be given

Consumers and electricity companies shall enter into a contract in relation to an agreement for the supply of electricity. The contract shall contain at least the information that is included in section 8 of the Consumer Agreement Act as regards agreements concluded outside the business place of business or by distance selling and section 17 of the Consumer Contracts Act as regards agreements other than agreements concluded outside the business place of business or on distance selling, including:

- Consumers rights to have a contract and to appeal dispute
- Content of the contract
- Terms of the contract (including termination conditions)
- Prices and fees (including changes) and how the information on fees can be obtained
- Payment conditions and methods

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **20 household electricity offers**, **11 household natural gas offers** and **31 household mix electricity and gas offers**
- 4 out of 6 energy suppliers offer **12 '100% green offers' in total** (2 suppliers offer 2 green offers each, 1 supplier offers 3 green offers and 1 supplier offers 5 green offers)
- 2 out of 6 energy suppliers offer **2 self-generation offers in total** (2 suppliers offer 2 self-generation offers each)



Bundled offers

0 out of 6 energy suppliers studied offer **bundled services**

Source: National Regulator DERA Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

According to the Electricity Supply Act 1329/2013, Chap. 2. Para. 6 (Switching) and Para. 3 (Contracts):

- The supplier must apply the switching within 10 working days after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fee

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 4 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

A consumer organisation (Forbrugerrådet TÆNK) conducted a collective switching campaign**



**BEUC, The European Consumer Organisation, Collective energy switch:

http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Price Comparison Tools (PCTs)

General overview



3

There are 3 Price Comparison tools in Denmark (sample of 1 PCT studied)



1 out of 1 PCTs studied is privately owned



There is no certification body nor scheme in Denmark



PCT clearly states on its website to cover 100% of the energy market in Denmark in terms of energy suppliers and available offers, based on a sample of 1 PCT

Market coverage

Out of 1 privately owned and run PCT studied:

- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 1 out of 1 PCT studied **clearly states to be independent from energy suppliers on its website**
- 0 out of 1 PCT studied displays information as regards the **source of data** presented on the website
- 1 out of 1 PCT studied offers consumers the possibility to **directly switch suppliers** from its website
- 0 out of 1 PCT studied presents information regarding **the switching procedures** of its website
- 0 out of 1 PCT studied explains **how often data** presented on the website **is being updated**
- 0 out of 1 PCT studied give consumers **the possibility to give their review of its website**
- 1 out of 1 PCT studied provides an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT bases its **quality assessment on the review of the comments that their consumers send to their customer service** and **further relies on internal assessment tools** (e.g. KPIs, traffic or page views by users, etc.)
- The PCT survey showed that 1 PCT reviews the comments that its consumers send to its consumers service

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Energy source and mix
- Conditions
- Price type
- Provider name
- Supplier

The **first results page**** on the Regulator PCT website show per offer at a minimum:

- Supplier name
- Estimated amount of savings
- Source of energy
- Contract duration



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- % of green energy
- Fee structure
- Contract conditions

Source: National Regulator DERA Survey

Sample Review performed by Deloitte on 1 Price Comparison Tools website

*Based on a sample of 1 PCT

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



6 out of 6

Energy suppliers explain the content of their bills on their website

Legal requirements

The Executive Order 1400/2015, Sections 2 & 4 and the Statement 937/2006, Sections 3, 5 & 8 regulate the energy bills for electricity and gas suppliers

This Executive Order gives consumers the possibility to receive a simplified bill. The purpose of this order is to ensure consumers have a better understanding of the price elements on their bill

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Energy mix
- Websites providing information on environmental impact of energy total payment and consumption overview for the period
- Pricing type, price breakdown and breakdown of the consumption
- Last payment date, billing period and date
- Customer and account numbers
- Binding price reduction
- Contract termination date
- Installation addresses, quotation numbers or Measurement Point ID and access to key self-service or internet service

Frequency of consumption statement

The Electricity Supply Act 1329/2013 Section 72a ensures that the consumers receive an energy bill **at least four times a year** and no later than two months after the end of a three-month period and ensures consumers receive an annual statement summarizing their energy consumption and costs (e.g. cost of electricity, gas and breakdown of prices)

The Statement 937/2006, Section 4 ensures that consumers receive **an annual statement** containing information about the measurement number, measurements for the start and end of the settlement period, consumption for the period according to meter and corrected consumption

Source: National Regulator DERA Survey
Sample Review performed by Deloitte on 6 energy suppliers



5 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites

Content

The Danish Regulator DERA requires **energy bills to mention the following elements**:

- Billing period
- Total cost of energy consumed during the period
- Average cost of energy
- Last payment date
- VAT and other taxes and fees
- Installation address and order number
- Start and end of period and consumption adjusted by a quality correction factor if necessary for the annual statement

The **bills** analysed (sample of 6 example bills) provide usually information on the following elements :

- Supplier's logo
- Company name and reference number
- Supplier contact details and link to the website
- Customer number, account, meter number and invoice number
- Due date and period
- Actual electricity usage and VAT
- Calculation method for the consumption
- Average consumption over the period
- Information about payment fees and tax reduction
- Price breakdown and consumption breakdown

4 out of the 6 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 6 example bills)



4 out of 6

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 6 example bills)

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Frequency of billing
- Payment methods





EU and national Regulatory Framework

DANISH LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Order 830 of 27/06/2016

On energy savings in network and distribution companies

Natural Gas Supply Act 1331/2013 as last amended by Law 630 of 08/06/2016

For the regulation of the natural gas market

Order 1400 of 03/12/2015

Order on the electricity companies' billing of costs to electricity consumers

Order 1233 of 06/11/2015

Order on the tasks and obligations of electricity trading companies for the supply of electricity

Electricity Supply Act 1329/2013 as last amended by Law 577 of 04/05/2015

For the regulation of the electricity market

Heat Supply Act 1184/2011 as last amended by Law 345 of 08/04/2014

To promote the most socio-economic use of energy for building heating and hot water supply in order to reduce the dependence of fossil fuels

Act 622 of 11/06/2010

Amending the Electricity Supply Act 1115/2006, the Act on Natural Gas Supply 1116/2006, the Act on Heat Supply 345/2005 and repealing the Act on the Use of Renewable Energy Sources

Act 461 of 12/06/2009

Amending the Waste and Raw Tax Act 1165/2006, the Act on Charges, Lignite and Coke, etc. 1068/2006, and various other laws and repeal of the Act on Grants for Electricity Production 1472/2009

Statement 937 of 11/09/2006

On the invoicing of natural gas companies and specification of costs to recipients of transport and energy services

Marketing Act 426 of 03/05/2017

Consumer Contracts Act 1457 of 17/12/2013

Law on agreements and other legal acts in the field of property law

ALTERNATIVE DISPUTE RESOLUTION

Consumer Complaints Act 456 of 10/06/2003 as last amended by Law 524 of 29/04/2015

This law applies to the supply, sale and other marketing of consumer goods from traders to consumers. The law also applies when a trader transfers goods to consumers

Order 1216 of 15/12/2011

On deadlines for DERA's handling of certain complaints

SOFT LAWS

Consumer Ombudsman: Guidance on "Energy Marketing" of 06/2016

Guidelines with reference to the energy market

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | DENMARK

Main bodies and contact details

Energy Regulator	Energitilsynet/Danish Energy Regulatory Authority (DERA) Carl Jacobsens Vej 35, 2500 Valby Website: http://energitilsynet.dk/	Energiklagenævnet/The Energy Board of Appeal (EBA) Frederiksborggade 15, 1360 København Website: http://www.ekn.dk/the-energy-board-of-appeal
	Energistyrelsen/Danish Energy Agency (DEA) 44 Amaliegade, 1256 København Website: http://www.ens.dk	
Single Point of Contact	Ankenævnet på Energiområdet Carl Jacobsens Vej 35, 2500 Valby Website: http://www.energianke.dk	
Price Comparison Tool	Elpris Website: http://elpris.dk/#/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Forbrugerombudsmanden/Consumer ombudsman Amagerfælledvej 56, 2300 København Website: http://www.forbrugerombudsmanden.dk/	Forbrugerklagenævnet/Danish Consumer Complaints Board Amagerfælledvej 56, 2300 København Website: http://www.forbrugerstyrelsen.dk/
Body with responsibilities relating to competition	Energitilsynet/Danish Energy Regulatory Authority (DERA) Konkurrencerådet/Danish Competition Authority Nyropsgade 30, 1780 København Website: http://energitilsynet.dk/	Konkurrencestyrelsen/Danish Competition and Consumer Authority Carl Jacobsens Vej 35, 2500 Valby Website: http://www.en.kfst.dk/
Alternative Dispute Resolution Entity	Ankenævnet på energiområdet/Energy Supplies Complaint Board (ESCB) Nyropsgade 30 6., 1780 København Website: http://www.energianke.dk	
Other relevant bodies and consumer organisations	Forbrugerrådet/Danish Consumer Council Fiolstraede 17 - Postbox 2188, 1017 Kobenhavn Website: http://www.fbr.dk	

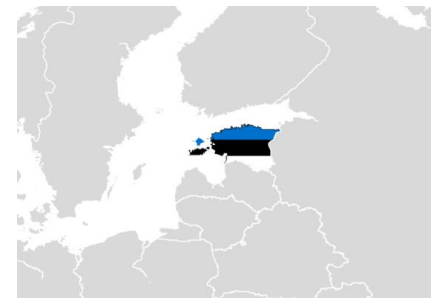


COUNTRY FICHE

ESTONIA

Key take-aways

This section presents a general summary of the key observations for Estonia on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Estonian and sometimes in Russian and English
- On average, 31 tariffs are offered on the energy suppliers' websites, based on a sample of 3 suppliers
- Out of these 31 tariffs, 18 household electricity offers, 6 household natural gas offers, 6 household mix electricity and gas offers, 1 '100% green offers' and 0 self-generation tariffs are offered
- 3 out of 3 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 3 suppliers
- The Electricity Market Act, Art. 85 and Art. 87, the Natural Gas Market Act, Art. 10 and the Consumer Protection Act, Art. 4 regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

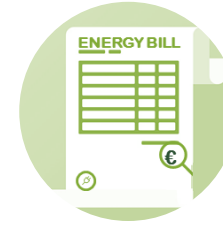
Switching fees & Contract termination fees

- There are no requirements included in the national legislation on switching fees and contract termination fees
- The Estonian Competition Authority (energy National Regulator) provides information on switching and contract termination on its website
- Energy switching has been promoted by the Regulator through an awareness raising campaign
- The Regulator reported in the Regulator survey that energy suppliers must provide information to consumers via their website on energy switching



Price Comparison Tools

- There are 3 Price Comparison tools in Estonia in total (sample of 2 PCTs studied)
- 2 out of 2 PCTs studied are privately owned
- There is no certification body nor scheme in Estonia
- 0 out of 2 PCTs clearly state on their websites to cover 100% of the energy market in Estonia in terms of energy suppliers and available offers, based on a sample of 2 PCTs



Energy Bills

- The Electricity Market Act, Art. 75 and the Natural Gas Market Act, Art. 9 regulate the energy bills for electricity and gas suppliers
- The Electricity Market Act, Art. 75 and the Natural Gas Market Act, Art. 9 regulate billing frequency





Pre-contractual Information

General overview



The offers are usually presented in Estonian and sometimes in Russian and English



31

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 3 suppliers



3 out of 3

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 3 suppliers



No fees are applied for switching and contract termination, based on the analysed sample of 3 suppliers

Legal requirements*

According to the Electricity Market Act, Art. 85 and Art. 87, a natural person or the party of the contract who is a consumer shall be provided with information on the material terms of the contract and any possible alternatives in terms of its content by the network provider or electricity provider, before the conclusion of a contract. It is not necessary to provide the information specified before if the contract is made by oral agreement or if the consumer does not wish to be given such information. The Electricity Market Act also provides minimum requirements regarding the terms and conditions that a contract shall include

According to the Natural Gas Market Act, Art. 10., before entering into a subscription, network or sales contract, the consumer who is a party to another contract must provide information on the main terms of the contract and any other variants of the content of the contract. The Natural Gas Market Act also provides minimum requirements which shall be provided in the subscription agreement, network agreement and contract of sale, or in their standard terms, written or in electronic form or in a form that allows retransmission of documents, or other more stringent formal requirements

According to the Consumer Protection Act, Art. 4, the consumer has the right to receive the information necessary for the safety of the goods or services offered, as well as for the protection of health, property and their economic interests

Offers and green energy offers studied

- The 3 energy suppliers offer **a total of 18 household electricity offers, 6 household natural gas offers** and **6 household mix electricity and gas offers**
- 1 out of 3 energy suppliers offers **1 '100% green offer' in total**
- 0 out of 3 energy suppliers offers **self-generation offers**

Bundled offers

0 out of 3 energy suppliers studied offer **bundled services**

Source: National Regulator ECA Survey

Sample Review performed by Deloitte on 3 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the 1st of August, 2007 Law, Art. 19(4):

- The supplier must apply the switching within 1 month after the consumer's request
- The supplier must terminate the contract within 1 month

There are **no requirements included in the national legislation** on:

- Switching fees
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 3 suppliers studied **apply switching fees**
- 1 out of 3 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Estonian Competition Authority provides information on switching and contract termination on its website

The Regulator reported in the Regulator survey that:


- Energy switching has been promoted by the Regulator through an awareness raising campaign
- Energy suppliers must provide information to consumers via their website on energy switching








Price Comparison Tools (PCTs)

General overview

3
 There are 3 Price Comparison tools in Estonia (sample of 2 PCTs studied)

 2 out of 2 PCTs studied are privately owned

 There is no certification body nor scheme in Estonia

0 out of 2
 PCTs clearly state on their websites to cover 100% of the energy market in Estonia in terms of energy suppliers and available offers, based on a sample of 2 PCTs

Market coverage

Out of 2 privately owned PCTs studied:

- The 2 PCTs do not clearly indicate their market coverage in terms of energy suppliers and available tariffs

Business model

- 2 out of 2 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 2 out of 2 PCTs studied display information as regards the **source of data** presented on the websites
- 0 out of 2 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 2 out of 2 PCTs studied present information regarding **the switching procedures** of its website
- 1 out of 2 PCT studied explains **how often data** presented on the website **is being updated**
- 1 out of 2 PCTs studied give consumers **the possibility to give their review of their websites**
- 0 out of 2 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT Survey showed that 1 PCT in Estonia reviews the comments that their consumers send to their customer service

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Type of tariffs
- Length of contract
- Name of the supplier
- Type of energy production

The **first results pages**** on the PCTs websites shows per offer at a minimum :

- | | |
|---------------------------------|--------------------------------|
| • Annual and monthly rate | • Link to offer details |
| • Supplier name | • Contract duration |
| • Tariff name | • Fees |
| • Average rates (day and night) | • Energy source |
| • Discounts | • Links to calculation methods |



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contractual conditions
- Contract termination fee
- Fee structure

Source: National Regulator ECA Survey
 Sample Review performed by Deloitte on 2 Price Comparison Tools

*Based on a sample of 2 PCTs
 **In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



1 out of 3

Energy supplier explains the content of its bills on its website



0 out of 3

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 1

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 1 example bills)

Legal requirements

The Electricity Market Act, Art. 75 and the Natural Gas Market Act, Art. 9 regulate the energy bills for electricity and gas suppliers. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Consumer details
- Energy sources
- Proportion of electricity purchased from a power exchange in the financial year preceding the period of the sale
- Website where to find information on environmental impact
- Customers rights and resolution of disputes
- Consumption of energy / volume of consumed gas
- Prices for the consumed energy
- The amount of electricity / volume of gas which was supplied in the previous calendar year

Content

The Regulator (Estonian Competition Authority) specifies on its website that suppliers must make all consumption data for electricity and gas available on their website (online) for their customers

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills:**

- Frequency of billing
- Payment methods
- Media used

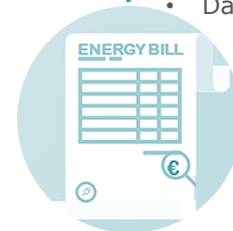
The **bills** analysed (sample of 1 example bills) provide usually information on the following elements:

- Supplier's logo
- Bill reference number
- Products and costs
- Consumption (total and breakdown)
- Total prices with/without VAT
- Dates and period of the billing
- Energy sources
- Share of renewable energy sold
- Website for information on environment impact
- Information on where to find information for dispute resolution



Frequency of consumption statement

The Electricity Market Act, Art. 75 and the Natural Gas Market Act, Art. 9 ensure that the consumers receive **a monthly energy bill** presenting their consumption and cost (e.g. cost of electricity, gas and breakdown of prices)



0 out of 3 energy suppliers studied provide information on the **elements required for switching on their bills**

Initiatives, non-binding measures and guidance documents

Since the 1st January of 2017, under the Grid Code, all standard electricity meters in Estonia were replaced with remote-readable meters to simplify meter readings to be incorporated in billing and consumption statements

The Regulator reported in the Regulator survey not to have cooperated with organisations as to improve the bill design





EU and national Regulatory Framework

ESTONIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Electricity Market Act as last amended on 10/07/2017

On the generation, transmission, sale, export, import and transit of electricity and the economic and technical management of the power system. On the principles of the operation of the electricity market, based on the need to ensure an effective supply of electricity which is provided at a reasonable price and which meets environmental requirements and the needs of consumers, and the utilization of energy sources in a balanced manner, in an environmentally clean way and with a long-term perspective

Natural Gas Market Act as last amended on 10/07/2017

The activities related to the import, transfer, distribution and sale of natural gas through the gas network and connection to the network

Law of Obligations Act as last amended on 01/07/2017

On the regulations of contracts

Energy Management Act of 16/06/2014

On the measures for the achievement of the national energy efficiency objective, the requirements for improving energy efficiency and the identification of obligated parties in both the public and private sectors

ALTERNATIVE DISPUTE RESOLUTION

Consumer Protection Act of 09/12/2015

On the offering and sale, or marketing in any other manner, of goods or services to consumers by traders, provides for the procedure for alternative dispute resolution between consumers and traders, including the organization of the work of the Consumer Disputes Committee, the organization and supervision of consumer protection and liability for violations of the Act

SOFT LAWS

Consumer Protection Act of 09/12/2015

On the offering and sale, or marketing in any other manner, of goods or services to consumers by traders, provides for the procedure for alternative dispute resolution between consumers and traders, including the organization of the work of the Consumer Disputes Committee, the organization and supervision of consumer protection and liability for violations of the Act

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | ESTONIA

Main bodies and contact details

Energy Regulator	Konkurentsiamet/Estonian Competition Authority (Regulatory Division) Auna 6, 10317 Tallinn Website: http://www.konkurentsiamet.ee/?lang=en		
Single Point of Contact	Konkurentsiamet/Estonian Competition Authority		
Price Comparison Tool	Energiaturg Website: http://energiaturg.ee/	Gaasihind (PCT not studied) Website: http://gaasihind.ee	Elektrihind Website: http://elektrihind.ee/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Consumer Protection Board Rahukohtu 2, 10130 Tallinn Website: http://www.tarbijakaitseamet.ee/en		
Body with responsibilities relating to competition	Estonian Competition Authority Auna 6, 10317 Tallinn Estonia Website: http://www.konkurentsiamet.ee/?lang=en		
Alternative Dispute Resolution Entity	Consumers Complaint Committee Rahukohtu 2, 10130 Tallinn Website: www.tka.riik.ee	Consumer Protection Board Rahukohtu 2, 10130 Tallinn Website: http://www.tarbijakaitseamet.ee/en	
Other relevant bodies and consumer organisations	Estonian Consumers Union Sakala 23a, 10141 Tallinn Website: http://www.tarbijakaitse.ee/		

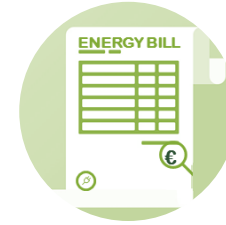


COUNTRY FICHE

FINLAND

Key take-aways

This section presents a general summary of the key observations for Finland on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in Finnish and sometimes in Swedish and English
- On average, 136 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 136 tariffs, 82 household electricity offers, 1 household natural gas offers, 8 household mix electricity and gas offers, 43 '100% green offers' and 2 self-generation tariffs are offered
- 6 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Electricity Market Act 588/2013, Art. 86 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Electricity Market Act 588/2013, 09/08/2013, Part II, Ch. 4, §26
- There are no requirements included in the national legislation on contract termination fees
- Information on switching procedures is available on Energiavirasto's website

Price Comparison Tools

- There are 5 Price Comparison tools in Finland in total (sample of 4 PCTs studied)
- 1 out of 4 PCTs studied is owned by the national Regulator (Energiavirasto) and 3 out of 4 PCTs studied are privately owned
- There is no certification body nor scheme in Finland
- 0 out of 4 PCTs clearly state on their websites to cover 100% of the energy market in Finland in terms of energy suppliers and available offers, based on a sample of 4 PCTs

Energy Bills

- The Energy Agency's Decree, Art. 4 and the Electricity Market Act (588/2013), Art. 57 regulate the energy bills for electricity and gas suppliers
- The Energy Agency's Decree, Art. 4 and the Electricity Market Act (588/2013), Art. 57 regulate billing frequency





Pre-contractual Information

General overview



The offers are usually presented in Finnish and sometimes in Swedish and English



136

Tariffs are offered on the energy suppliers' websites, on average on a sample of 6 suppliers



6 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



1 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Electricity Market Act 588/2013, Art. 86, before the conclusion of an agreement, the distribution system operator shall provide the end-user with information about the key terms and conditions of the contract and the options available on the contract, such as pricing options. The retailer must provide the end-user with information corresponding to the conclusion of the electricity distribution agreement

Before the conclusion of an electricity agreement, at least the following information must be provided to the end-user:

- The name and contact details of the service provider
- The performance or service offered and its quality and, in the case of the Accession Treaty, the time of the subscription
- Any maintenance services related to the performance or service under the contract
- The methods through which end-user receives information about the charges applicable to the contract or related maintenance services
- The duration of the contract, terms and conditions for renewal and contract termination

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **82 household electricity offers**, **1 household natural gas offers** and **8 household mix electricity and gas offers**
- 6 out of 6 energy suppliers provide **43 '100% green offers' in total** (1 energy supplier provides 2 green offers, 1 energy supplier provides 3 green offers, 1 energy supplier provides 5 green offers, 2 energy suppliers provide each 6 green offers and 1 energy supplier provides 21 green offers)
- 2 out of 6 energy suppliers provide **2 self-generation offers in total** (2 energy suppliers provide each 1 self-generation offer)

Bundled offers

0 out of 6 energy suppliers studied offer **bundled services**



Switching fees and contract termination fees

According to the Law 588/2013, 09/08/2013, Part II, Ch. 4, §26 and §91:

- Switching is free of charge
- The supplier must terminate the contract within 2 weeks

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching after the consumer's request
- Contract termination fees

Practices in the energy market in relation to switching

- 1 out of 6 suppliers studied **apply switching fees**
- 6 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Regulator Energiavirasto published information on switching procedures on its website



Source: National Regulator Energiavirasto Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Price Comparison Tools (PCTs)

General overview



5

There are 5 Price Comparison tools in Finland (sample of 4 PCTs studied)



1 out of 4 PCTs studied is owned by the national Regulator (Energiavirasto) and 3 out of 4 PCTs studied are privately owned



There is no certification body nor scheme in Finland



0 out of 4

PCTs clearly state on their websites to cover 100% of the energy market in Finland in terms of energy suppliers and available offers, based on a sample of 4 PCTs

Market coverage

Out of 1 PCT provided by the national Regulator:

- The market coverage is not clearly indicated in terms of suppliers and offers

Out of 3 privately owned PCTs studied:

- 3 PCTs do not clearly indicate their market coverage in terms of suppliers and cover respectively 92, 128, 5 and 16 offers

Business model

- 1 out of 4 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 4 PCTs studied display information as regards the **source of data** presented on their websites
- 2 out of 4 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 3 out of 4 PCTs studied present information regarding **the switching procedures** of their websites
- 2 out of 4 PCTs studied explain **how often data** presented on the website **is being updated**
- 0 out of 4 PCTs studied give consumers **the possibility to give their review of their websites**
- 0 out of 4 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Contract type
- Energy mix

In addition**

- Product type
- Tariff type

The **first results pages**** on the PCTs websites show per offer at a minimum:

- Supplier name
- Tariff name
- Average cost per kWh
- Link to offer details
- Estimated cost per year
- Contract duration
- Links to details
- Estimated amount of savings per year and/or contract duration



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- % of green energy
- Contract conditions
- Contract duration
- Price stability

In addition**

- Contract termination period
- Energy price
- Product type



Energy Bills

General overview



4 out of 6

Energy suppliers explain the content of their bills on their website



2 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 4

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements

The Energy Agency's Decree, Art. 4 and the Electricity Market Act (588/2013), Art. 57 regulate the energy bills for electricity and gas suppliers. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Content of the bill (e.g. number of pages, lay out)
- Frequency of the bill (at least four times a year)
- Payment methods (energy suppliers must accept cash and checks)
- Consumption data and information on fuel mix
- Breakdown of price (e.g. breakdown charges in consumer bills according to energy costs, network charges and taxes/levies)
- Information on complaint handling

Frequency of consumption statement

The Energy Agency's Decree, Art. 4 and the Electricity Market Act (588/2013), Art. 57 ensure the consumers receive billing **at least four times a year**

The electricity provider must send the final electricity bill to the consumer within six weeks after the electricity supply termination

On demand, customers can change their frequency of billing

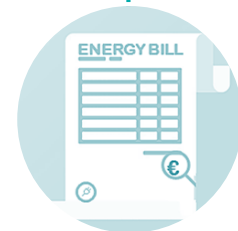
Content

The Finnish Regulator complements the national legal framework by requiring **energy bills to mention the following elements:**

- Billing period and estimated due date of the next invoice
- Charges affecting the formation of electricity sales and/or distribution
- The number and price of units to be invoiced for each payment
- The total amount of all debit invoices and of consumed electricity
- VAT (value and percentage) and tax
- Information on customer complaints
- Eventual compensations

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills:**

- Frequency of billing
- Payment methods
- Media used



The **bills** analysed (sample of 4 example bills) provide usually information on the following elements:

- Bill information
- Customer information
- Contract details
- Actual electricity usage
- Break-down of total charges
- Breakdown of actual electricity usage
- Basic information of price break-down
- Supplier's logo

0 out of the 4 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 4 example bills)



Initiatives, non-binding measures and guidance documents

According to the Regulator Survey, the Regulator does not cooperate with organisations as to improve the bill design



EU and national Regulatory Framework FINNISH LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

The Natural Gas Market Law Act 508/2000 as last amended by Law of 25/08/2017

For the liberalization of the Finnish Natural Gas Market

The Energy Efficiency Act 1429/2014, of 30/12/2014

Promoting energy efficiency

The Act on the Energy Authority 870/2013 of 13/12/2013

Concerning the Energy Authority scope and responsibilities

The Electricity Market Act 588/2013 of 09/08/2013

For the liberalization of the Finnish Electricity Market (Sähkömarkkinalaki/ Elmarknadslag 588/2013)

The Act on Supervision of Electricity and Gas Markets 590/2013, of 09/08/2013

Concerning the monitoring of the electricity and natural gas market

Law on Wind Power Compensation Areas, Act. 490/2013 of 28/06/2013

Concerning the Energy Authority scope and responsibilities

Law on Electricity and Natural Gas Tariffs Act 950/2012 of 21/12/2012

Concerning the Energy Authority scope and responsibilities

Law on Power Reservoirs for the Balance of Electricity Production and Consumption Act 117/2011 of 11/02/2011

Concerning the Energy Authority scope and responsibilities

Law on the Production of Electricity from Renewable Energy Sources Act. 1396/2010 of 30/12/2010

Concerning the Energy Authority scope and responsibilities

Law on Energy Efficiency Services for Companies Operating in the Energy Market Act.1211/2009 of 01/01/2010

Concerning the Energy Authority scope and responsibilities

The Act on Verification and Notification of Origin of Electricity 1129/2003 of 19/12/2003

Concerning the certification of renewable energy sources

The Consumer Protection Act 1978/38 of 20/01/1978

This law applies to the supply, sale and other marketing of consumer goods from traders to consumers. The law also applies when a trader transfers goods to consumers

APPLICABLE NATIONAL REGULATIONS

The Energy Agency's Decree on Electricity Sales and Electricity Distribution Bills Specification 1097/002/2013

Concerning the rules applied to invoices issued by a retailer or distribution system operator to electricity sales and / or electricity distribution to customers

ALTERNATIVE DISPUTE RESOLUTION

The Consumer Protection Act 1978/38 of 20/01/1978

This law applies to the supply, sale and other marketing of consumer goods from traders to consumers. The law also applies when a trader transfers goods to consumers

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | FINLAND

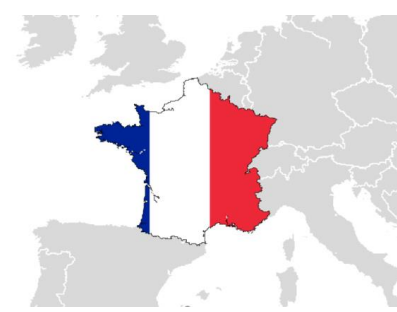
Main bodies and contact details

Energy Regulator	Energiavirasto/Energy Authority Lintulahdenkuja 4, 00530 Helsinki Website: http://www.energiavirasto.fi	
Single Point of Contact	Not found at the time of the study	
Price Comparison Tool	Sähkön hinta Website: http://www.sahkonhinta.fi/	Sähkön kilpailutus Website: http://www.sahkonkilpailutus.fi/
	Sähkövertailu Website: http://www.sahkovertailu.fi	Kilpailuttaja Website: http://www.kilpailuttaja.fi/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Kilpailu- ja kuluttajavirasto – Kuluttaja-asiamies/Finnish Competition and Consumer Authority - Consumer Ombudsman Siltasaarekatu 12 A, 00530 Helsinki Website: http://www.kkv.fi	
Body with responsibilities relating to competition	Kilpailu- ja kuluttajavirasto/Finnish Competition and Consumer Authority Siltasaarekatu 12 A, 00530 Helsinki Website: http://www.kkv.fi/	
Alternative Dispute Resolution Entity	Kuluttajariitalautakunta/The Consumer Disputes Board Hämeentie 3, P.O. Box 306, 00531 Helsinki Website: http://www.kuluttajariita.fi/fi/	
Other relevant bodies and consumer organisations	Kuluttajaliitto-Konsumentförbundet ry./The Consumers' Union of Finland Malminrinne 1 B, 00180 Helsinki Website: http://www.kuluttajaliitto.fi	Kuluttajat-Konsumenterna ry. (The Consumers) Website: http://www.kuluttajat-konsumenterna.fi



COUNTRY FICHE

FRANCE



Key take-aways

This section presents a general summary of the key observations for France on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in French and sometimes in English
- On average, 47 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 47 tariffs, 12 household electricity offers, 14 household natural gas offers, 8 household mix electricity and gas offers, 11 '100% green offers' and 2 self-generation tariffs are offered
- 5 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Code de la consommation, Art. L.224-3 and L.224-4 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

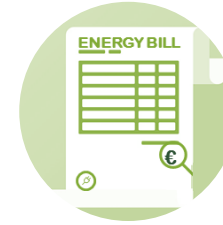
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Consumer Code, amended on 14/03/2016, Art. L224-15
- Termination fees must be justified and correspond to the costs effectively supported by the supplier. The offer must specifically state contract termination fees will apply. The Regulator (Commission de régulation de l'énergie (CRE)) published a guide aimed at helping customers understand the procedure of switching energy suppliers* A consumer organisation (UFC-Que Choisir) conducted a collective switching campaign**
- The Regulator has conducted a collective switching campaign



Price Comparison Tools

- There are 12 Price Comparison tools in France in total (sample of 6 PCTs studied)
- 1 out of 6 PCTs studied is owned by the Regulator (Commission de régulation de l'énergie), 1 out of 6 PCTs studied is owned by the energy ombudsman and 4 out of 6 PCTs studied are privately owned
- There is no certification body nor scheme in France
- 0 out of 6 PCTs clearly state on their websites to cover 100% of the energy market in France in terms of energy suppliers and available offers, based on a sample of 6 PCTs



Energy Bills

- The Ministerial Order of energy billing 18 April 2012, Art. 4, the 'Code de la consommation', Art. L.224-1 and the 'Code de l'énergie', Art. R.333-1 regulate the energy bills for electricity and gas suppliers
- The Regulation 18/04/2012 regulates billing frequency
- The Regulator reported in the Regulator survey not to have cooperated with organisations as to improve the bill design
- The Regulator published practical and interactive guides aimed at helping customers understand the content of their energy bill***

*Energie-info, practical guide on switching procedure: <http://www.energie-info.fr/Fiches-pratiques/Je-change-de-fournisseur/Je-souhaite-changer-de-fournisseur-d-electricite-ou-de-gaz-naturel>

**BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf

***Practical guides on bills content: <http://www.energie-info.fr/Fiches-pratiques/Ma-facture-mon-compteur/Les-differents-elements-de-ma-facture> & http://www.energie-mediateur.fr/fileadmin/user_upload/Publications/GuidePratiqueMediateur_Mars_2016.pdf



Pre-contractual Information

General overview



The offers are presented in French and sometimes in English



47

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



5 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



1 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements

According to the Code de la consommation, Art. L.224-3 and L.224-4 the information mentioned in Article L. 224-3 shall be made available to the consumer in writing or in a durable medium prior to the conclusion of the contract. The supply of electricity or natural gas supply specifies, in clear and comprehensible terms, the following information (L. 224-3):

- Description of the proposed products and services, the prices in the effective date of the contract as well as, where necessary, the conditions of evolution of these prices
- Possibility for customers to amend their choice
- Duration of the contract and its conditions for renewal
- Duration of the validity of the offer
- Projected deadline of energy supply
- Means to reach the information relative to the access and to the use of the public networks of distribution
- Possibility of voluntary interruption of the supply of energy
- Conditions and the modalities of contract termination
- Conditions of the contractual liability of the supplier

Offers and green energy offers studied

- The 6 energy suppliers offer a total of 12 household electricity offers, 14 household natural gas offers and 8 household mix electricity and gas offers
- 6 out of 6 energy suppliers offer **11 '100% green offers' in total** (4 suppliers offer 1 green offer each, 1 energy supplier offers 2 green offers and 1 energy supplier offer 5 green offers)
- 2 out of 6 energy suppliers offer **2 self-generation offers in total** (2 energy suppliers offer 1 self-generation offer each)

Bundled offers

4 out of 6 energy suppliers studied offer **9 bundled services in total** (2 energy suppliers offer 1 bundled service each, 1 energy supplier offers 3 bundled offers and 1 energy supplier offers 4 bundled offers)



Switching fees and contract termination fees

According to the Consumer Code, last amended 06/10/2017, Art. L121-89:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 1 out of 6 suppliers studied **apply switching fees**
- 4 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Commission de régulation de l'énergie published a practical and interactive guide aimed at helping customers understand the procedure of switching energy suppliers*

A consumer organisation (UFC-Que Choisir) conducted a collective switching campaign**

The Regulator reported in the Regulator survey to have conducted a collective switching campaign



*Energie-info, practical guide on switching procedure: <http://www.energie-info.fr/Fiches-pratiques/Je-change-de-fournisseur/Je-souhaite-changer-de-fournisseur-d-electricite-ou-de-gaz-naturel>

**BEUC, The European Consumer Organisation, Collective energy switch:

http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Price Comparison Tools (PCTs)

General overview



12

There are 12 Price Comparison tools in France (sample of 6 PCTs studied)



1 out of 6 PCTs studied is owned by the Regulator (Commission de régulation de l'énergie), 1 out of 6 PCTs studied is owned by the energy ombudsman and 4 out of 6 PCTs studied are privately owned



There is no certification body nor scheme in France



0 out of 6

PCTs clearly state on their websites to cover 100% of the energy market in France in terms of energy suppliers and available offers, based on a sample of 6 PCTs

Market coverage

Out of 1 PCT owned by the national Regulator:

- The 1 PCT does not clearly indicate its market coverage in terms of suppliers and covers 400 offers

Out of the 1 PCT provided by the energy ombudsman:

- The 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Out of 4 privately owned PCTs studied:

- 4 PCTs cover 16 to 22 suppliers and 22 to 30 offers

Business model

- 3 out of 6 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 6 PCTs studied display information as regards the **source of data** presented on their websites
- 3 out of 6 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 2 out of 6 PCTs studied present information regarding **the switching procedures** of their websites
- 2 out of 6 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 6 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 2 out of 6 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT sends a survey to its consumers to rate the website and reviews the comments that its consumers send to its consumers service

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Discount
- Energy mix

In addition**

- % Green electricity
- Ecological impact
- Provider
- Fixed price

The **first results pages** on the PCT websites do not show other information than the offers' price

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions
- Contract termination conditions
- Additional services

In addition**

- Billing method
- Customer service
- Fee structure
- Green energy percentage
- Payment methods



Source: National Regulator CRE Survey
Sample Review performed by Deloitte on 6 Price Comparison Tools

*Based on a sample of 6 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



4 out of 6

Energy suppliers explain the content of their bills on their website



4 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



3 out of 4

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements*

The Ministerial Order of energy billing 18 April 2012, Art. 4, the Code de la consommation, Art. L.224-1 and the 'Code de l'énergie', Art. R.333-1 regulate the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Consumption history in kWh over a full year preceding the issuing of the bill, possibly in a graph format, allowing a comparison with the consumption of the previous year at the same period, if the supplier has this information, and distinguishing the real and estimated consumptions
- Electricity bills: the consumption site delivery point number and the subscribed power and for natural gas: Name of your gas meter on the distribution network and estimation, as well as the annual reference consumption or the projected annual consumption used by the supplier for its estimations
- Reference number of the customer's meter
- Type of meter information transmitted by the distribution network administrator
- Reference number of the bill, its date of issue and its deadline of payment
- Estimated date of the next bill
- Period during which the customer can transmit indexes for consideration in the next bill forecast and the modalities of this transmission
- Terms of payment
- Contact details to reach the suppliers customer service
- Contact details of the distribution network administrator
- Customer reference number
- Contact details of the customer

Content

The French Regulator CRE complements the national legal framework by requiring **energy bills to mention the following elements**:

- Price breakdown (e.g. breakdown charges in consumer bills according to energy costs, network charges and taxes/levies)
- Information on complaint handling

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

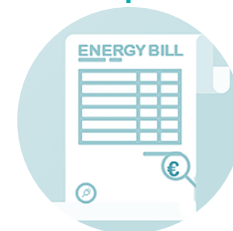
- Frequency of billing
- Payment methods
- Media used

The **bills** analysed (sample of 4 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Customer data
- Details of the contract



3 out of the 4 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 4 example bills)



Initiatives, non-binding measures and guidance documents

The Regulator reported in the Regulator survey not to have cooperated with organisations as to improve the bill design

The French energy Regulator published practical and interactive guides aimed at helping customers understand the content of their energy bill**

Frequency of consumption statement

The regulation 18/04/2012 ensures that the consumers receive **at least one annual statement** presenting their consumption



Source: National Regulator CRE Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

**Practical guides on bills content: <http://www.energie-info.fr/Fiches-pratiques/Ma-facture-mon-compteur/Les-differents-elements-de-ma-facture> & http://www.energie-mediateur.fr/fileadmin/user_upload/Publications/GuidePratiqueMediateur_Mars_2016.pdf



EU and national Regulatory Framework

FRENCH LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Regulation of 18/04/2012

Ministerial order about energy billing

Regulation of 31/08/2010

Concerning the setting of the transitional market-adjusted regulated tariff level

APPLICABLE NATIONAL REGULATIONS

Law of 12/07/2010, amended 01/03/2017

On the national commitment to the environment (Grenelle II Law)

Law of 07/12/2016

On the organization of the electricity market

Law of 07/12/2016 (Article 266 quinquies C)

On the internal taxes of the energy market

Law of 18/08/2015

Concerning the energy transition, the reinforcement of the French energy independence and the access to energy at a competitive cost for consumers

Law of 17/03/2014

Establishing numerous changes within the Consumer Code (also called Loi Hamon) and implementing the main rules for conducting e-commerce with consumers

Law of 07/12/2010

Defining the organisation of the electricity market (also called Loi NOME) and aiming at opening the French market since EDF (Electricité de France/ Electricity of France) – incumbent operator on the market – is in a monopolistic situation

Law of 13/07/2005 (article 76)

Establishing the energy policy guidelines (Loi de programme fixant les orientations de la politique énergétique also called Loi POPE)

Source: National Regulator CRE website

<http://www.cre.fr/documents/reglementations>

<https://www.legifrance.gouv.fr/>

Former Deloitte study on European energy regulations

ALTERNATIVE DISPUTE RESOLUTION

Order 2015-282 of 11/03/2015

Consolidated version of 14/07/2017

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

The Energy Code

Article R.333-1

Gathering all the measures related to gas and electricity in a unique text

The Consumer Code

Article L.224-1 and following

Facilitating the understanding of the existing consumer laws by gathering them and structuring them

The Building and Housing Code

Gathering all the measures related to construction, real-estate development, social housing

Practical guide on switching procedure

Practical guides on bills content

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | FRANCE

Main bodies and contact details

Energy Regulator	Commission de régulation de l'énergie / French Energy Regulatory Commission 15, rue Pasquier 75379 Paris Cedex 08 Website: http://www.cre.fr	
Single Point of Contact	Médiateur national de l'énergie 15 Rue Pasquier, 75008 Paris Website: http://www.energie-mediateur.fr/	
Price Comparison Tools	Je change Website: http://www.jechange.fr/energie	Energie Moins Chère Website: http://www.energiemoinschere.com/
	Comparateur-offres-energie Website: http://comparateur-offres.energie-info.fr/	UFC Que Choisir Website: http://www.quechoisir.org/comparateur-energie-n21201/
	Selectra Website: http://comparateur.selectra.info/	French Energy Regulatory Commission Website: http://www.cre.fr/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF) / General Directorate for Competition Policy, Consumer Affairs and Fraud Control Télédoc 151, 139, rue de Bercy, 75572 Paris Cedex 12 Website: http://www.dgccrf.bercy.gouv.fr	
Body with responsibilities relating to competition	Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF) / General Directorate for Competition Policy, Consumer Affairs and Fraud Control Autorité de la concurrence / Competition Authority 11 Rue de l'Echelle, 75001 Paris Website: http://www.autoritedelaconcurrence.fr	
Alternative Dispute Resolution Entity	Médiateur national de l'énergie	
Other relevant bodies and consumer organisations	CLCV (Consommation Logement et Cadre de Vie), Association nationale de la défense des consommateurs et usagers / National Association for the Defense of Consumers and Users 59 boulevard Exelmans, 75016 Paris Website: http://www.clcv.org	



COUNTRY FICHE

GERMANY



Key take-aways

This section presents a general summary of the key observations for Germany on the topics highlighted below



Pre-contractual Information Offers

- The offers are usually only presented in German
- On average, 41 tariffs are offered on the energy suppliers' websites based on a sample of 6 suppliers
- Out of these 41 tariffs, 14 household electricity offers, 13 household natural gas offers, 0 household mix electricity and gas offers, 9 '100% green offers' and 5 self-generation tariffs are offered
- 5 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The EnWG, StromGKV, Art. 40-42 and the Civil Code, Section 305 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

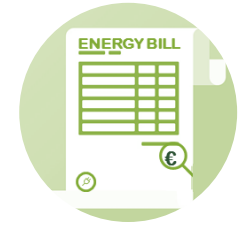
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Energy Industry Act, last amended 2013, Art. 20
- There are no requirements included in the national legislation on contract termination fees
- Information on switching and contract termination is provided to customers on the Federal Network Agency's website
- Several German public/private initiatives and organizations published practical guides aimed at helping customers understand the procedure of switching energy suppliers*
- The Regulator reported in the Regulator survey that (i) energy switching has been promoted by the National; (ii) they have organized an awareness raising campaign; (iii) energy suppliers must provide information to consumers via their website on energy switching; (vi) energy suppliers must provide information on switching to consumers in their contracts



Price Comparison Tools

- There are 10 Price Comparison tools in Germany in total (sample of 5 PCTs studied)
- The 5 PCTs studied are all privately owned
- There is no certification body nor scheme in Germany
- 0 out of 5 PCTs clearly state on their websites to cover 100% of the energy market in Germany in terms of energy suppliers and available offers, based on a sample of 5 PCTs



Energy Bills

- The EnWG, StromGKV, Art. 40-42 regulates the energy bills for electricity and gas suppliers
- The EnWG, StromGKV, Art. 40-42 regulates billing frequency
- Several German public/private initiatives and organizations published practical guides aimed at helping customers understand their energy bill*





Pre-contractual Information

General overview



The offers are usually only presented in German



41

Tariffs are offered on the energy suppliers' websites on average, based on a sample of 6 suppliers



5 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the EnWG, StromGKV, Art. 40-42 and the Civil Code, Section 305, the household customer must be offered different payment options before concluding the contract. If an advance payment is agreed, it must be based on the consumption of the previous billing cycle or the average consumption of comparable customers. If the customer believes that his consumption is significantly lower, this should be considered appropriately. A prepayment is not due before the start of the delivery

The contract for supplying household customers with energy must be simple and understandable. It must contain provisions about:

- Contract duration, notice periods as well as the right of withdrawal for the customer
- Price modifications
- Services to be provided, including offered maintenance services
- Various payment options are to be offered to households before the contract is concluded
- Liability and indemnity provisions in the event of non-performance of contractually agreed services
- The free and rapid switch of suppliers

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **14 household electricity offers**, **13 household natural gas offers** and **0 household mix electricity and gas offers**
- 6 out of 6 energy suppliers offer **9 '100% green offers' in total** (3 energy suppliers offer 1 green offer each and 3 energy suppliers offer 2 green offers each)
- 4 out of 6 energy supplier offer **5 self-generation offers in total** (3 energy supplier offer 1 self-generation offer each and 1 energy supplier offers 2 self-generation offers)

Bundled offer

1 out of 6 energy suppliers offer **2 bundled services in total**

Source: National Regulator Survey German Federal Network Agency

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the Energy Industry Act, last amended 2013, Art. 20:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 4 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Information on switching and contract termination is provided to customers on the Federal Network Agency's website

Several German public/private initiatives and organizations published practical guides aimed at helping customers understand the procedure of switching energy suppliers**

The Regulator reported in the Regulator survey that:

- Energy switching has been promoted by the national Regulator through an awareness raising campaign
- Energy suppliers must provide information to consumers via their website on energy switching
- Energy suppliers must provide information on switching to consumers in contracts



**Informationen über Energieanbieter, non-binding measures and reports:

<http://www.energieanbieterinformation.de>

& Marktwachter, non-binding measures and reports:

<https://www.marktwaechter-energie.de/>



Price Comparison Tools (PCTs)

General overview



10

There are 10 Price Comparison tools in Germany (sample of 5 PCTs studied)



The 5 PCTs studied are all privately owned



There is no certification body nor scheme in Germany



0 out of 5

PCTs clearly state on their websites to cover 100% of the energy market in Germany in terms of energy suppliers and available offers, based on a sample of 5 PCTs

Market coverage

Out of 5 privately owned PCTs studied:

- 1 PCT covers 970 suppliers and 9,000 offers
- 1 PCT covers 1,200 electricity suppliers and 900 gas suppliers and 12,000 offers
- 3 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 1 out of 5 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 5 PCTs studied display information as regards the **source of data** presented on their websites
- 4 out of 5 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 3 out of 5 PCTs studied present information regarding **the switching procedures** of their websites
- 3 out of 5 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 5 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 3 out of 5 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Energy mix
- Period of notice to terminate the contract

In addition**

- 100% green energy
- Advance payment
- Contract duration
- Deposit

The **first results page**** on the PCT website shows per offer:

- | | |
|---------------------|-----------------|
| • Supplier name | • Energy source |
| • Product name | • Price |
| • Contract duration | • Link |



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- % of green energy
- Billing method
- Caution
- Contract condition

In addition**

- Contract duration
- Fee structure
- 100% Online tariff

Source: National Regulator German Federal Network Agency Survey
Sample Review performed by Deloitte on 5 Price Comparison Tools

*Based on a sample of 5 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



5 out of 6

Energy suppliers explain the content of their bills on their website



5 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



1 out of 5

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 5 example bills)

Legal requirements

The EnWG, StromGKV, Art. 40-42 regulates the energy bills for electricity and gas suppliers, the consumer rights as to receive clear information on one's energy contract before signing, and to be informed in advance if any changes are made to the contract (Article 41). According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Content of the bill
- Bill layout
- Consumption data
- Information on the fuel mix
- Frequency of billing
- Payment methods
- Price format
- Price breakdown
- Information on switching
- Information on complaint handling
- The German Institute for Transparency on Energy (DIFET) produces certificates for those suppliers that provide consumer-friendly bills

Frequency of consumption statement

The EnWG, StromGKV, Art. 40-42 ensures that consumers receive **monthly, quarterly or semi-annual billing** informing the consumer of the contribution of each energy source used, of the impact on the environment (CO2 emissions and radioactive wastes from electricity production) and of consumers rights regarding litigation and complaint handling

Source: National Regulator German Federal Network Agency Survey
Sample Review performed by Deloitte on 6 energy suppliers

*Informationen über Energieanbieter, non-binding measures and reports:
<http://www.energieanbieterinformation.de> & Marktwachter, non-binding measures and reports:
<https://www.marktwachter-energie.de/>

Content

The German Regulator complements the national legal framework by requiring **energy bills to mention the following elements:**

- Applicable prices and paid discounts
- Concession and network charges for the customers, measuring and operation costs of the metering point operation
- Contact details of the consumer service
- Reference to the energy providers list of the Federal Office for energy efficiency
- Unique customer's meter point reference number
- Contact details of consumer organisations and energy agencies
- Part of the energy source in the energy mix
- Consumption of the comparable prior-year period
- Graphic representation of annual consumption of the customer
- Calculation factors of energy components
- Code number of the network operator

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills:**

- Frequency of billing
- Payment methods
- Media used

The **bills** analysed (sample of 5 example bills) usually provide information on the following elements:

- Conditions for cancellation
- Supplier logo
- Details of the supplier and the contract
- Information on consumption
- Summary of the bill
- Customer data
- Dates of the meter readings
- Type of meter
- Total price and price breakdown
- Environmental impact of the energy
- Customer information website addresses
- Alternative option to the current tariff

1 out of the 5 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 5 example bills)

Initiatives, non-binding measures and guidance documents

Several German public/private initiatives and organizations published practical guides aimed at helping customers understand billing*





EU and national Regulatory Framework

GERMAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Regulation of 26/10/2006 amended the 29/08/2016 (StromGVV)

On general terms and conditions under which energy supplier need to provide electricity to households at a general price and on the settlement of the bills

Regulation of 26/10/2006 amended the 29/08/2016 (GasGVV)

On general terms and conditions under which energy supplier need to provide gas to households at a general price and on the settlement of the bills

Regulation of 01/11/2006 amended the 29/08/2016

On the general terms and conditions for the grid connection and its use for gas supply

Law of 20/12/1974 amended the 31/08/2015

To ensure the coverage of the vital energy demand in the event that the energy supply is directly threatened or disturbed and the risk or disruption of the energy supply is not remedied by means of appropriate market measures

Law of 12/02/1990 amended the 27/06/2017

Regulating the assessment of environmental impact in projects which, by their nature, size or location, can have a significant impact on the environment

Law of 03/07/2004 amended the 03/03/2010

Against unfair competition and unfair commercial practices of companies towards consumers

Law of 07/07/2005 amended the 29/05/2017

On the organization of the electricity market to ensure a safe, affordable, consumer-friendly and environmentally compatible supply

Law of 01/09/2005

Describing minimum requirements regarding the energy use of new and renovated buildings

Law of 15/07/2006 amended the 10/03/2017

Implements the requirements of the European Energy Tax Directive

Law of 26/10/2006 amended the 29/08/2016

Regulating the conditions under which household customers are to be supplied with electricity by the electricity supply companies according to the Energiewirtschaftsgesetz (EnWG)

Law of 27/02/2008 amended the 31/08/2015

Transposes the EU Eco-design Directive into German law

Law of 07/08/2008

Sets the legal goal of covering at least 14% of the heating and cooling energy supply especially of buildings by renewable energies by 2020

Law of 21/08/2009 amended the 22/12/2016

Deals with extra-high voltage grid and concrete performance targets

Law of 04/11/2010 amended the 17/02/2016

Setting out the requirements of Directive 2012/27/EU

Law of 10/05/2012 amended the 10/12/2005

For the labelling of products with information about the consumption of energy and of other important resources

Law of 21/07/2014 amended on 17/07/2017

To foster the development of technologies for renewable energy production and achieve cost reductions

Law of 21/12/2015 amended the 22/12/2016

About the efficient production of electricity and heat with low CO₂ emissions particularly with natural gas

Law of 29/08/2016 amended the 22/12/2016

Regulates the use of smart meters and the communication of measured values

ALTERNATIVE DISPUTE RESOLUTION

Civil Code of the 18/08/1896 amended the 21/02/2017

Introducing alternative dispute resolution into the Civil Code

SOFT LAWS

Civil Code of the 18/08/1896 amended the 21/02/2017

The purpose of this Code is to facilitate the understanding of the existing consumer laws by gathering them and structuring them

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | GERMANY

Main bodies and contact details

Energy Regulator	Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen, BNetzA, (Federal Network Agency) Tulpenfeld 4, 53113 Bonn Website: http://www.bundesnetzagentur.de/		
Single Point of Contact	Bundesnetzagentur (Federal Network Agency)		
Price Comparison Tool	Greizkragen Website: http://www.geizkragen.de/preisvergleich/	Preisvergleich.de Website: http://www.preisvergleich.de/	Financescout24 Website: http://www.financescout24.de/?cpref
	Verivox Website: http://www.verivox.de/power/	Toptarif Website: http://www.toptarif.de/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Consumer Centres (Verbraucherzentralen) Verbraucherzentrale Bundesverband e.V. (umbrella organisation) Markgrafenstraße 66, 10969 Berlin Website: https://www.verbraucherzentrale.de/home		
Body with responsibilities relating to competition	Federal cartel office (Bundeskartellamt) Kaiser-Friedrich-Str. 16 D, 53113 Bonn Website: http://www.bundeskartellamt.de/DE/Home/home_node.html	Zentrale zur Bekämpfung unlauteren Wettbewerbs Frankfurt am Main e. V. (Wettbewerbszentrale) Landgrafenstraße 24 B - 61348 Bad Homburg vor der Höhe Website: http://www.wettbewerbszentrale.de/de/home/	
Alternative Dispute Resolution Entity	Schlichtungsstelle Energie e.V. Friedrichstraße 133, 10117 Berlin Website: http://www.schlichtungsstelle-energie.de/		
Other relevant bodies and consumer organisations	Bund der Energieverbraucher e. V.(BdE) Frankfurter Straße 1, 53572 Unkel Website: http://www.energieverbraucher.de/		



COUNTRY FICHE

GREECE



Key take-aways

This section presents a general summary of the key observations for Greece on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Greek and sometimes in English
- On average, 30 tariffs are offered on the energy suppliers' websites, based on a sample of 5 suppliers
- Out of these 30 tariffs, 20 household electricity offers, 1 household natural gas offers, 1 household mix electricity and gas offers, 7 '100% green offers' and 1 self-generation tariffs are offered
- 2 out of 5 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 5 suppliers
- The Law 4001/2011, Art. 48-51 and the Electricity Supply Code, annex II Art. 1 regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

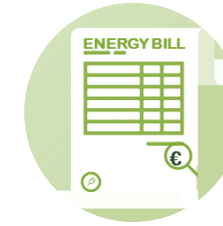
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Law 4001/2011, Para. 1 and 3, Art. 46-51
- There are no requirements included in the national legislation on contract termination fees



Price Comparison Tools

- There are 4 Price Comparison tools in Greece in total (sample of 2 PCTs studied)
- The 2 PCTs studied are privately owned
- There is no certification body nor scheme in Greece
- 1 out of 2 PCTs clearly state on their websites to cover 100% of the energy market in Greece in terms of energy suppliers and available offers, based on a sample of 2 PCTs



Energy Bills

- The Electricity Supply Code, annex II Art. 1 regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment
- The EnWG, StromGKV, Art. 40-42 regulates billing frequency
- Information campaigns are available on the Regulator's website on bills and in general regarding consumer's rights*
- The national Regulator has launched several initiatives related to energy bills and pre-contractual information and monitors the issue of billing simplicity and from time to time issues non-binding advices to suppliers on the content and the presentation format of the invoice





Pre-contractual Information

General overview



The offers are presented in Greek and sometimes in English



30

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 5 suppliers



2 out of 5

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 5 suppliers



1 out of 5

Suppliers apply switching fees, based on a sample of 5 suppliers

Legal requirements*

According to the Law 4001/2011, Art. 48-51 and the Electricity Supply Code, annex II Art. 1 customers have free and easy access to information that can enable them to choose the appropriate supplier according to their needs. Suppliers are required to disclose, at least on their website, the terms and conditions contained in their contracts and their price lists. The Regulatory Authority for Energy publishes aggregated tables with the contact details and the published accounts of all the suppliers. Suppliers have to produce general statistics based on their customers' information as well as information about their activities

Elements a contract shall include:

- Description of the products and services, the prices in the effective date of the contract as well as, where necessary, the conditions of evolution of these prices
- Services provided as well as the time needed for the connection
- The relevant authorisations and documents that should be provided by customers to suppliers
- The cases in which a customer can refuse the offer provided by the supplier
- The minimum duration of the contract and the relevant terms and conditions in case the customer would like to terminate the contract
- The information that the customer should provide to the Regulatory Authority for Energy
- The obligations that the Regulatory Authority for Energy has towards customers
- The contractual obligations that the customer has based on the contract

Offers and green energy offers studied

- 5 suppliers offer a total of **20 household electricity offers, 1 household natural gas offers and 1 household mix electricity and gas offers** in the country
- 2 out of 5 energy suppliers offer **7 '100% green offers' in total** (1 energy supplier offers 6 green offers and 1 energy supplier offers 1 green offer)
- 1 out of 5 energy suppliers offers **1 self-generation offer in total**

Bundled offers

1 out of 5 energy suppliers studied offers **2 bundled service in total**

Sample Review performed by Deloitte on 5 energy suppliers

**Covers only an extract of the national legal requirements. Details can be found in the draft final report*



Switching fees and contract termination fees

According to the Law 4001/2011, Para. 1 and 3, Art. 46-51:

- The supplier must apply the switching within 2 weeks after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 1 out of 5 suppliers studied **apply switching fees**
- 4 out of 5 suppliers studied **provide information regarding switching on their website**





Price Comparison Tools (PCTs)

General overview



4

There are 4 Price Comparison tools in Greece in total (sample of 2 PCTs studied)



The 2 PCTs studied are privately owned



There is no certification body nor scheme in Greece



1 out of 2

PCTs clearly state on their websites to cover 100% of the energy market in Greece in terms of energy suppliers and available offers, based on a sample of 2 PCTs

Market coverage

Out of 2 privately owned PCTs studied:

- 1 PCT covers 100% of the energy market in Greece in terms of suppliers and available offers
- 1 PCT covers 100% of the energy market in Greece in terms of suppliers and does not indicate its market coverage in terms of offers

Business model

- 2 out of 2 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 2 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 2 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 1 out of 2 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 2 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 2 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 2 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT sends a survey to its consumers to rate the overall functioning of the PCT website

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers cannot be filtered by other additional criteria*

The **first results pages**** on the PCT websites show per offer at a minimum:

- Price per year
- Contract length
- Tariff type

Non-price elements

The user **cannot** compare any **non-price elements of the offer** on the PCT websites. The information is generally not easy to compare



*Based on a sample of 2 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



3 out of 5

Energy suppliers explain the content of their bills on their website



4 out of 5

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 3

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 3 example bills)

Legal requirements*

The Electricity Supply Code, annex II Art. 1 regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

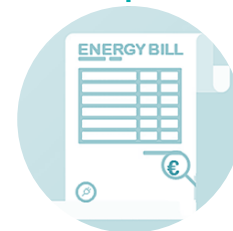
According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The supplier's details (company name, postal address, fax number, email, website, tax number)
- The customer's details (name, site address, billing address, contact details, tax number), the meter registration number and the meter asset number
- Any penalty charges or compensation credited to the customer by the Network Operator for failure to provide guaranteed levels of service and indication of the respective infringement
- The number, issue date and type of bill as well as the period the bill covers
- The Basic or Special Customer Category (Domestic or Non-domestic / Commercial, connection voltage, etc.)
- Indication of the applied tariff
- The dates for the previous, current and next meter reading provided that these are made available by the relevant operator
- Meter data

Frequency of consumption statement

The Electricity Supply Code, annex II Art. 1 ensures that periodically, **at least once a year**, the supplier informs the consumers through a relevant letter or flyer attached to or as part of the electricity bill, regarding the following:

- Consumption data and total electricity supply cost for the previous year; estimated consumption and supply cost for the current year, as well as a reminder about the Customer's right to change Supplier
- Information regarding the contribution of each energy source in the total fuel mix during the previous year, in accordance with paragraph 2, Article 13 of the current Code



Content

The **bills** analysed (sample of 3 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Information on consumption
- Price breakdown
- Customer service details
- Customer data
- Details of the contract
- Tariff name
- Dates of the meter readings
- Type of meter
- Price of energy

0 out of the 3 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 3 example bills)



Information on elements for switching

Information on information campaigns are available on the Regulator's website regarding bills and consumer's rights**

The national Regulator has launched several initiatives related to energy bills and pre-contractual information (e.g. brochures) in Greece

The national Regulator monitors the issue of billing simplicity and from time to time issues non-binding advices to suppliers on the content and the presentation format of the invoice

Sample Review performed by Deloitte on 5 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

**Q&A Guide on understanding consumer rights and energy bills:

<http://rae.gr/old/consumer/ECquestionnaire.pdf>



EU and national Regulatory Framework

GREEK LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

The Electricity Supply Code (FEK B' 832/9.04.2013)

Regulates the obligations and the rights of the customers and the electricity suppliers

Law 4001/2011

Regulates the organization of energy markets

Law 3426/05 (Government Gazette A 309 / 22-12-05)

Accelerating the process for the liberalization of the electricity market

Law 3175/03 (Government Gazette A '207 / 29-08-03)

Exploitation of geothermal potential, district heating and other provisions

Law 2941/01 (Gazette Issue A '201 / 12-09-01)

Simplification of procedures for the establishment of companies, licensing of renewable energy sources, regulation of issues of "HELLENIC SHIPPING SA "and other provisions

Law 2837/00 (Government Gazette A '178 / 03-08-00)

Regulation of Competitive Issues of the Regulatory Authority of Energy, Tourism and other provisions.

Law 2773/99 Government Gazette A '286 / 22-12-99

Liberalization of the electricity market - Regulation of energy policy issues and other provisions." Sectors of Electricity and Renewable Energy"

ALTERNATIVE DISPUTE RESOLUTION

Annex III pf the Electricity Code

Regulates the procedure of handling the complaints of the consumers

SOFT LAWS

Q&A Guide on understanding consumer rights and energy bills by the Regulatory Authority for Energy

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law

COUNTRY FICHE

HUNGARY

Key take-aways

This section presents a general summary of the key observations for Hungary on the topics highlighted below



Pre-contractual Information Offers

- The offers are usually presented in Hungarian
- On average, 25 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 25 tariffs, 20 household electricity offers, 2 household natural gas offers, 0 household mix electricity and gas offers, 3 '100% green offers' and 0 self-generation tariffs are offered
- 2 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Law on Electricity (2007 evi LXXXVI torveny a villamos energiáról), Art. 62 regulates the minimum requirements regarding the content of offers presented to consumers

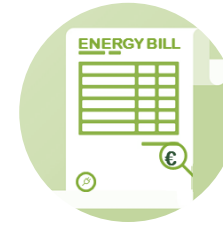
Switching fees & Contract termination fees

- There are no requirements included in the national legislation on switching fees and contract termination fees



Price Comparison Tools

- There are no Price Comparison tools for the energy market in Hungary



Energy Bills

- The Law on Electricity (2007 evi LXXXVI torveny a villamos energiáról), Annex I regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment
- The Law on Electricity (2007 evi LXXXVI torveny a villamos energiáról) regulates billing frequency





Pre-contractual Information

General overview



The offers are presented in Hungarian



25

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



2 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 2 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

The national legal framework does not include minimum requirements on pre-contractual information

According to The Law on Electricity (2007 evi LXXXVI torveny a villamos energiáról), Art. 62, the electricity purchasing contract to be concluded between the electricity provider and the consumer shall include at least the following:

- The names of the contracting parties: in the case of a natural person; indication of their name, address, legal person; in the case of a legal entity established under its general rules; the name of its registered office, business registration number or equivalent and tax identification number
- The date on which the service is to be used
- The name of the services provided, the quality of the services offered in accordance with the provisions of the law and the legal consequences of a service of a different quality, including the reference to the fact that the payment of a penalty for a service of differing standard does not relieve the damages caused
- The price of the service at the conclusion of the contract
- The contact details of the electricity retailer's customer service
- The duration of the contract, the conditions of the contract, the terms of the services used, details on the contract termination

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **20 household electricity offers, 2 household natural gas offers** and **0 household mix electricity and gas offers**
- 3 out of 6 energy suppliers offer **3 '100% green offers' in total** (3 energy suppliers provide each 1 green offer)
- 0 out of 6 energy suppliers offer **self-generation offers**

Bundled offers

- 0 out of 6 energy suppliers studied offer **bundled services**

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the Consumer Code, last amended 06/10/2017, Art. L121-89:

- The supplier must apply the switching within 1 month after the consumer's request
- The supplier must terminate the contract within 30 days**

There are **no requirements included in the national legislation** on:

- Switching fees
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 5 out of 6 suppliers studied **provide information regarding switching on their website**



**Applicable to non-fixed term contracts only



Price Comparison Tools (PCTs)

General overview



There are no Price Comparison tools available in Hungary



Energy Bills

General overview



5 out of 6

Energy suppliers explain the content of their bills on their website



5 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 5

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 5 example bills)

Legal requirements

The Law on Electricity (2007 evi LXXXVI torvény a villamos energiáról), Annex I regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The electricity supplier contact details
- Customer service of the supplier contact details
- Mediator contact details
- Period related to the bill
- Amounts billed
- Details on savings from governmental household bill reduction measures
- VAT rate and amount
- Product or service
- Length of the contract including starting date (and end date if applicable)

Frequency of consumption statement

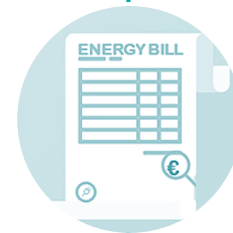
The Law on Electricity (2007 evi LXXXVI torvény a villamos energiáról) ensures that the consumers receive **at least one statement every year** presenting their consumption

Content

The **bills** analysed (sample of 5 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Tariff name
- Details of the contract
- Type of meter
- Comparison with the previous year's consumption
- Summary of the bill
- Customer data
- Information on consumption
- Dates of the meter readings
- Price breakdown
- Duration of the contract

0 out of the 5 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 5 example bills)





EU and national Regulatory Framework

HUNGARIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Government Decree 45/2014. (II.26.)

On the detailed rules of contracts between consumers and businesses

Law 2013 evi CLXXXVIII törvény az egységes közszolgáltatói számlaképről

On the single public service account

Government Decree 309/2013. (VIII.16.), 01/01/2010

On the certification of the origin of electricity from renewable energy sources and high efficiency cogeneration

Act on Natural Gas Supply, 01/01/2010

Minister of Economy and Transport 110/2007. (XII.23.)

On the method of calculating the determination of the amount of electricity produced by high efficiency, useful heat energy and the amount of useful heat

Government Decree 323/2007. (XII. 11.) of the Government of the Republic of Hungary

On Climate Change and its Kyoto Protocol on the Implementation Framework of the Kyoto Protocol of 2007. certain rules of implementation of the law

Electricity Act of 2007

Minister without portfolio 7/2006

On the definition of the energetic characteristics of buildings

XVIII. Act on District Heating, 2005

1996 LVII

Law on the prohibition of unfair market behaviour and restriction of competition

ALTERNATIVE DISPUTE RESOLUTION

Government Decree 225/2007. (VIII.31.) On the National Consumer Protection Authority 1997 Act on Consumer Protection

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law

COUNTRY FICHE

IRELAND



Key take-aways

This section presents a general summary of the key observations for Ireland on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in English and sometimes in Gaelic
- On average, 43 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 43 tariffs, 15 household electricity offers, 9 household natural gas offers, 13 household mix electricity and gas offers, 4 '100% green offers' and 2 self-generation tariffs are offered
- 0 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Statutory Instrument 463/2011, Art. 5 (1-6) regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

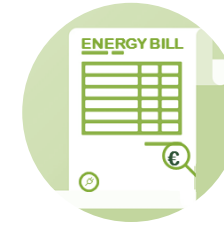


Price Comparison Tools

Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Statutory Instrument No. 463/2011, Art. 5(8) (a) ad 5(8)(c), Art. 6 and 8
- There are no requirements included in the national legislation on contract termination fees
- The Commission for Energy Regulation published guides aimed at helping customers understand the procedure of switching energy suppliers*

- There are 10 Price Comparison tools in Ireland in total (sample of 2 PCTs studied)
- 2 out of 2 PCTs studied are privately owned and certified by the Commission for Regulation of Utilities
- The Commission for Regulation of Utilities (Ireland) operates a voluntary accreditation scheme since 2011**
- 0 out of 2 PCTs clearly state on their websites to cover 100% of the energy market in Italy in terms of energy suppliers and available offers, based on a sample of 2 PCTs



Energy Bills

- The Statutory Instrument 426/2014, Art. 6 and 7 delegates the regulation of energy bills for electricity and gas suppliers to the Commission for Energy Regulation
- The regulation does not specify at which frequency the consumers should receive statements presenting their consumption
- The Irish Regulator provides a guide explaining which information should be listed on the energy bills***

*CER, 'Switch Guide': <http://www.cer.ie/customer-care/electricity/changing-supplier>

**CRU, August 2011, 'Decision on CER Accreditation Framework for Price Comparison Websites': <https://www.cru.ie/wp-content/uploads/2011/07/cer11144.pdf>

***CRU, Bills Guide: <http://www.cer.ie/customer-care/electricity/your-bill>





Pre-contractual Information

General overview



The offers are presented in English and sometimes in Gaelic



43

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



0 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Statutory Instrument 463/2011, Art. 5 (1-6), a customer charter shall be provided in advance of any contractual commitment with a household customer. The conditions including in the customer charter shall be fair, transparent, readily accessible, and expressed in clear and comprehensible language

A customer charter shall, at a minimum, and where appropriate, provide that all household customer are informed of:

- Their statutory rights to be supplied with electricity or natural gas of a specified quality at reasonable prices
- The name and address of the supplier
- Services to be provided
- Service quality levels offered as well as the time for the initial connection
- Types of maintenance service, if such service is offered
- Means by which up-to-date information on all applicable tariffs and, if offered, maintenance charges may be obtained

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **15 household electricity offers, 9 household natural gas offers** and **13 household mix electricity and gas offers** in the country
- 2 out of 6 energy suppliers offer **4 '100% green offers' in total** (1 energy supplier offers 1 green offer and 1 energy supplier offers 3 green offers)
- 1 out of 6 energy suppliers offer **2 self-generation offers in total**

Bundled offers

5 out of 6 energy suppliers studied offer **19 bundled services in total** (1 energy supplier offers 2 bundled services, 2 energy suppliers offer 3 bundled services each, 1 energy supplier offers 5 bundled services and 1 energy supplier offers 6 bundled services)

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the Statutory Instrument No. 463/2011, Art. 5(8) (a) ad 5(8)(c), Art. 6 and 8:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 6 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Regulator Commission for Energy Regulation published guides aimed at helping customers understand the procedure of switching energy suppliers**

**CER, 'Switch Guide': <http://www.cer.ie/customer-care/electricity/changing-supplier>





Price Comparison Tools (PCTs)

General overview



10

There are 10 Price Comparison tools in Ireland in total (sample of 2 PCTs studied)



2 out of 2 PCTs studied are privately owned and certified by the Commission for Regulation of Utilities



The Commission for Regulation of Utilities (Ireland) operates a voluntary accreditation scheme since 2011*



0 out of 2

PCTs clearly state on their websites to cover 100% of the energy market in Italy in terms of offers, suppliers and available offers, based on a sample of 2 PCTs

Market coverage

Out of 2 privately owned and certified PCTs studied:

- 2 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 1 out of 2 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 2 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 2 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 0 out of 2 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 2 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 2 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 2 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers cannot be filtered by other criteria*

The **first results pages**** on the PCT websites show per offer at a minimum:

- Supplier's name
- Contract duration
- Tariff name
- Energy source
- Link to the offer

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions
- Payment methods
- Billing method
- 100% online tariff



*Based on a sample of 2 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



5 out of 6

Energy suppliers explain the content of their bills on their website



5 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 5

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 5 example bills)

Legal requirements

The Statutory Instrument 426/2014, Art. 6 and 7 delegates the regulation of energy bills for electricity and gas suppliers to the Commission for Energy Regulation

Frequency of consumption statement

The regulation does not specify at which frequency the consumers should receive statements presenting their consumption

Content

The Irish Regulator complements the national legal framework by requiring suppliers to deliver an energy bill that contains the following minimum requirements:

- The supplier's name and contact detail
- An emergency contact number
- Account number
- The period to which the bill relates, the date of issue and the date when payment is due
- The tariff category
- The meter reading upon which the bill is based. This should indicate whether the reading is based on an actual reading or an estimated meter read
- A calculation of the amount of electricity supplied
- Any levies applied to the bill
- The total amount due for the period
- A brief description of how to make a complaint
- A list of payment options

The **bills** analysed (sample of 5 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Switching procedures
- Tariff name
- Duration of the contract
- Information on consumption
- Dates of the meter reading

0 out of the 5 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 5 example bills)

Initiatives, non-binding measures and guidance documents

The Irish Regulator provides a guide explaining which information should be listed on the energy bills*





EU and national Regulatory Framework

IRISH LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

S.I. No. 16/2015 Regulations 2015, 23/01/15
Regulates the natural gas and electricity market

D5 / HL / B / F29 / oik. 10205 Government Gazette 1657 / 06.23.14 Amendment of Nos. D5-HL / B / F29 / 16027 Decision of the Deputy Minister of Environment, Energy and Climate Change "Implementing the Social Household Tariff"

S.I. No. 426/2014 Regulations 2014
Regulates metering and billing, energy distribution and incentives

S.I. No. 336/2014 Regulations 2014
Regulates unfair terms in consumer contracts and amendment

S.I. No. 484/2013 Regulations 2013
Regulates consumer information, cancellation and other rights

S.I. No. 243/2012 Regulations 2012
Regulates energy performance of buildings

Law 4001 (O.G. A 179/22.08.2011) - Operation of Electricity and Natural Gas Energy Markets

S.I. 463/2011, EUROPEAN COMMUNITIES (INTERNAL MARKET IN ELECTRICITY AND GAS) (CONSUMER PROTECTION) REGULATIONS 2011, Regulations 2011
Regulates consumer protection in natural gas and electricity market

Electricity Supply Code

Law No. 4122 on Building Energy Efficiency

ALTERNATIVE DISPUTE RESOLUTION

Statutory Instruments No 368/2015 – European Union (Alternative Dispute Resolution for Consumer Disputes) 04/09/2015
Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

Switch Guide by the national Regulator CRU

Confidence Code by the national Regulator CRU

Bills Guide by the national Regulator CRU

EUROPEAN DIRECTIVES

Directive 2013/11/EU
Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC

Directive 2012/27/EU
Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012

Directive 2011/83/EU
Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive

Directive 2009/73/EC
Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136

Directive 2009/72/EC
Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC

Directive 2009/28/EC
Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC

Directive 2005/29/EC
Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004

Directive 2005/89/CE
Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)

Directive 93/13/EEC
Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | IRELAND

Main bodies and contact details

Energy Regulator	Commission for Regulation of Utilities (CRU) Belgard Square North Tallaght, Dublin 24 Website: https://www.cru.ie/	
Single Point of Contact	The Exchange Belgard Square North Tallaght, Dublin 24 Website: https://www.cru.ie/	
Price Comparison Tools	Bonkers.ie Website: http://www.bonkers.ie	Uswitch.ie Website: http://www.uswitch.ie
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Energy Customers (part of CRU) Belgard Square North Tallaght, Dublin 24 Website: https://www.cru.ie/	
Body with responsibilities relating to competition	Irish Competition Authority (ICA) 14 Parnell Square, Dublin 1 Website: http://www.tca.ie	
Alternative Dispute Resolution Entity	CRU	ICA
Other relevant bodies and consumer organisations	Consumers Association of Ireland (CAI) Fitzwilliam Business Centre, 26 Upper Pembroke Street, Dublin 2 Website: http://www.thecai.ie	



COUNTRY FICHE

ITALY



Key take-aways

This section presents a general summary of the key observations for Italy on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Italian and sometimes in English
- On average, 59 tariffs are offered on the energy suppliers' websites, based on a sample of 5 suppliers
- Out of these 59 tariffs, 19 household electricity offers, 18 household natural gas offers, 0 household mix electricity and gas offers, 20 '100% green offers' and 2 self-generation tariffs are offered
- 3 out of 5 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 5 suppliers
- The Decreto Legislativo 93/11 Art. 43(2) and the Code of Conduct for the sale of electricity and gas to final consumers, Art. 3 and Art. 9 regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

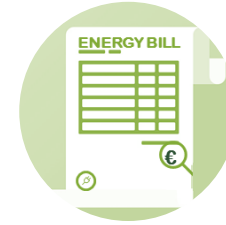
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Electricity Act 2010, Art. 76 and the Gas Act 2011, Art. 123
- No specific requirements are included in the national legislation on contract termination fees
- Consumer associations in Italy participate to meetings with the Autorità per l'Energia Elettrica e il Gas (AEEG) to debate about relevant matters for consumers regarding electricity and gas and such as in relation to switching



Price Comparison Tools

- There are 17 Price Comparison tools in Italy in total (sample of 5 PCTs studied)
- 1 out of 5 PCTs studied is owned by the Regulator (Autorità per l'Energia Elettrica e il Gas) and 4 out of 5 PCTs studied are privately owned
- There is no certification body nor scheme in Italy
- 0 out of 5 PCTs clearly state on their websites to cover 100% of the energy market in Italy in terms of energy suppliers and available offers, based on a sample of 5 PCTs



Energy Bills

- The Decreto Legislativo 93/11 Art. 43(2) and L 125/07 Art. 1(6) and Art. 1(5) regulate the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment
- The Decreto Legislativo 93/11, Art. 43(2) regulates billing frequency
- Structural meetings are organized between consumer associations and the energy Regulator to debate about relevant matters for consumers regarding electricity and gas
- Consultations are organised aimed at introducing new authority declarations such as billing, switching methods and times, pre-contractual information, and protection tools
- The Italian Regulator has set up several tools in order to help the consumer understand his bill, most notably a dedicated webpage 'Your Bill Explained' ('la bolletta spiegata')* and a consumer help-desk ('lo Sportello per il Consumatore')**



*'Your Bill Explained' ('la bolletta spiegata'): <http://www.autorita.energia.it/it/callcenter.htm>

**Consumer help-desk ('lo Sportello per il Consumatore'): <http://www.sportelloperilconsumatore.it/>



Pre-contractual Information

General overview



The offers are presented in Italian and sometimes in English



59

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 5 suppliers



3 out of 5

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 5 suppliers



0 out of 5

Suppliers apply switching fees, based on a sample of 5 suppliers

Legal requirements*

The Decreto Legislativo 93/11 Art. 43(2) ensures suppliers apply the requirements stated in Annex I of the EU Directives 2009/72/EC and 2009/73/EC

According to the Code of Conduct for the sale of electricity and gas to final consumers, Art. 3 and Art. 9, the companies (including energy suppliers) should provide information on their contractual offers in a transparent, complete and non-transparent way discriminatory. The supplier will provide information to the consumer through forms and commercial communications. The information will include their contact details and details on who the consumer can contact in order to obtain information about the offer (Code of Conduct, Art. 3)

Before the conclusion of the contract, the final consumer must receive the following information:

- Contact details of the supplier
- Any limitative conditions to the offer
- The main characteristics of the goods or service
- The main content of the contract
- Methods and time for the execution of the contract
- Validity of the offer and methods of accession

Offers and green energy offers studied

- The 5 energy suppliers offer a total of **19 household electricity offers**, **18 household natural gas offers** and **0 household mix electricity and gas offers** in the country
- 2 out of 5 energy suppliers offer **20 '100% green offers' in total** (1 energy supplier offers 2 green offers and 1 supplier offers 18 green offers)
- 1 out of 5 energy suppliers offer **2 self-generation offers in total**



Bundled offers

4 out of 5 energy suppliers offer **7 bundled services in total** (3 energy suppliers offer 1 bundled service each and 1 energy supplier offers 4 bundled services)

Switching fees and contract termination fees

According to the D.Lgs. 79/99, Art. 35(1) and the Deliberazione 25/06/2007, N. 144/07, Annex A, Art. 4:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 1 month after the consumer's request**

There are **no requirements included in the national legislation** on:

- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 5 suppliers studied **apply switching fees**
- 3 out of 5 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Consumer associations in Italy participate to meetings with the Autorità per l'Energia Elettrica e il Gas (AEEG) to debate about relevant matters for consumers regarding electricity and gas and also contribute to consultations aimed at introducing new authority declarations for amongst others switching methods and switching frequency



Sample Review performed by Deloitte on 5 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

**May be less, if specified in the contract



Price Comparison Tools (PCTs)

General overview



17

There are 17 Price Comparison tools in Italy in total (sample of 5 PCTs studied)



1 out of 5 PCTs studied is owned by the Regulator (Autorità per l'Energia Elettrica e il Gas) and 4 out of 5 PCTs studied are privately owned



There is no certification body nor scheme in Italy



0 out of 5

PCTs clearly state on their websites to cover 100% of the energy market in Italy in terms of energy suppliers and available offers, based on a sample of 5 PCTs

Market coverage

Out of the 1 PCT owned by the national Regulator:

- 1 PCT studied covers 32 supplier and does not clearly indicate its market coverage in terms of offers

Out of the 4 privately owned PCTs studied:

- 1 PCT covers 19 suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT covers 13 suppliers and does not clearly indicate its market coverage in terms of offers
- 2 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 1 out of 5 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 1 out of 5 PCTs studied display information as regards the **source of data** presented on their websites
- 4 out of 5 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 0 out of 5 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 5 PCTs studied explain **how often data** presented on their websites **is being updated**
- 1 out of 5 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 5 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Energy mix
- Payment method
- Time of use
- Type of residence

In addition**

- Annual consumption

The **first results pages**** on the PCT websites show per offer at a minimum:

- Price per month
- Tariff type
- Link to the supplier's website
- Suppliers and tariffs
- Supplier's logo
- Contract duration



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- % of green energy
- 100% Online tariff
- Billing method
- Fee structure
- Payment method

In addition**

- Additional services
- Contract termination conditions
- Customer service
- Deposit
- Discount

*Based on a sample of 5 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



5 out of 5

Energy suppliers explain the content of their bills on their website



4 out of 5

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 5

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 5 example bills)

Legal requirements

The Decreto Legislativo 93/11 Art. 43(2); L 125/07 Art. 1(6) and Art. 1(5) regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The identity and address of the supplier
- The services provided
- The service quality levels offered
- The time for the initial connection
- The types of maintenance service offered
- The means by which up-to-date information on all applicable tariffs and maintenance charges may be obtained
- Information relating to consumer rights, including info on the complaint handling
- The duration of the contract
- The conditions for renewal and termination of services and of the contract and whether withdrawal from the contract without charge is permitted
- Any compensation and the refund arrangements which apply if contracted service quality levels are not met, including inaccurate and delayed billing
- The method of initiating procedures for settlement of disputes

Frequency of consumption statement

The Decreto Legislativo 93/11, Art. 43(2) ensures that the consumers receive statements **four times a year** presenting their consumption



Content

The Italian Energy Regulator published **a document** helping customers understand the content of their energy bill*

The **bills** analysed (sample) provide usually information on the following elements:

- Duration of the contract
- Summary of the bill
- Tariff name
- Contract details
- Logo of the supplier
- Details of the supplier
- Customer data
- Information on consumption

0 out of the 5 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 5 example bills)



Initiatives, non-binding measures and guidance documents

There are structural meetings between consumer associations and the competent energy Regulator taking place to debate about relevant matters for consumers regarding electricity and gas

There are consultations aimed at introducing new authority declarations such as billing, switching methods and times, pre-contractual information, and protection tools

The Italian Regulator has set up several tools in order to help the consumer understand his bill, most notably a dedicated webpage 'Your Bill Explained' ('la bolletta spiegata')* and a consumer help-desk ('lo Sportello per il Consumatore')**

*'Your Bill Explained' ('la bolletta spiegata'): <http://www.autorita.energia.it/it/callcenter.htm>

**Consumer help-desk ('lo Sportello per il Consumatore'): <http://www.sportelloperilconsumatore.it/>



EU and national Regulatory Framework ITALIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Delibera 04 agosto 2016, 458/2016/R/eel
Regulates billing in the energy sector

Decreto legislativo 93/11, 01/06/11
Regulates price transparency and offerings in the energy sector

Codice di Condotta Commerciale per la vendita di energia elettrica e di gas naturale ai clienti finali (Code of Conduct for the sale of electricity and gas to final consumers), 01/01/11
Regulates supply of energy for small clients

Legge 125/07, 03/08/07
Regulates contract termination

Codice del Consumo (Consumer Code), 29/07/03
Regulates customers' rights and duties

Decreto legislativo 79/99, 16/03/99
Regulates energy distribution

ALTERNATIVE DISPUTE RESOLUTION

**Decreto Legge 132/2014
12/09/2014**
Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

Guides on bills content by the Autorità per l'Energia Elettrica e il Gas (AEEG)

EUROPEAN DIRECTIVES

Directive 2013/11/EU
Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC

Directive 2012/27/EU
Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012

Directive 2011/83/EU
Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive

Directive 2009/73/EC
Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136

Directive 2009/72/EC
Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC

Directive 2009/28/EC
Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC

Directive 2005/29/EC
Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004

Directive 2005/89/CE
Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)

Directive 93/13/EEC
Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | ITALY

Main bodies and contact details

Energy Regulator	Autorità per l’Energia Elettrica e il Gas (AEEG) Piazza Cavour, 5, 20121 Milan Website: http://autorita.energia.it	
Single Point of Contact	AEEG	
Price Comparison Tools	Supermoney Website: http://energia.supermoney.eu	AEEGSI Website : http://autorita.energia.it/it/trovaofferte
	Segugio Website: http://tariffe.segugio.it	
	Facile Website: http://facile.it	Tom's Hardware Website: http://tariffe.tomshw.it
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Ministry of Economic Development Via Molise 2, 00187 Rome Website: http://sviluppoeconomico.gov.it/	
Body with responsibilities relating to competition	Autorità Garante della Concorrenza e del Mercato (Antitrust Authority) Piazza G. Verdi, 6/A, 00198 Rome Website: http://agcm.it	
Alternative Dispute Resolution Entity	AEEG	
Other relevant bodies and consumer organisations	Altroconsumo Via Valassina, 22, 20159 Milan Website: http://altroconsumo.it/	



COUNTRY FICHE

LATVIA

Key take-aways

This section presents a general summary of the key observations for Latvia on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Latvian and sometimes in English
On average, 18 tariffs are offered on the energy suppliers' websites, based on a sample of 4 suppliers
- Out of these 18 tariffs, 16 household electricity offers, 2 household natural gas offers, 0 household mix electricity and gas offers, 0 '100% green offers' and 0 self-generation tariffs are offered
- 0 out of 4 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 4 suppliers
- The Electricity Trading and Usage Regulation (Elektroenerģijas tirdzniecības un lietošanas noteikumi, Articles 22, 23 and 31) regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

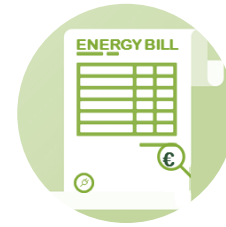
Switching fees & Contract termination fees

- No specific requirements are included in the national legislation on switching fees and contract termination fees



Price Comparison Tools

- There are 2 Price Comparison tools in Latvia in total (sample of 2 PCTs studied)
- 2 out of 2 PCTs studied are privately owned
- There is no certification body nor scheme in Latvia
- 0 out of 2 PCTs clearly state on their websites to cover 100% of the energy market in Latvia in terms of energy suppliers and available offers, based on a sample of 2 PCTs



Energy Bills

- The amended law of 1 August 2007 relating to the organization of the gas market, Art. 12 and the Luxembourg Consumer Code of 28 December 2016 regulate the energy bills for electricity and gas suppliers and the conditions of reimbursement of overpayment
- The Provision on information for end users of electricity and natural gas (09/03/17 N. 55 (5882)) regulates billing frequency





Pre-contractual Information

General overview



The offers are presented in Latvian and sometimes in English



18

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 4 suppliers



0 out of 4

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 4 suppliers



1 out of 4

Suppliers apply switching fees, based on a sample of 4 suppliers

Legal requirements*

According to the Electricity Trading and Usage Regulation (Elektroenerģijas tirdzniecības un lietošanas noteikumi, Articles 22, 23 and 31), the trader shall indicate the following information in the electricity trade agreement: the identity and address of the trader and user, the term of the contract, the trading period of the electricity, the contract for early termination of the agreement, the price of electricity or its determination formula, the procedure for the coordination of electricity delivery schedules, the procedure to settle disputes and the contact information to obtain any other necessary information (Art. 22)

In the case of electricity offers with a household customer, the supplier shall include the following information in the contract:

- Contact details of the supplier
- Contract terms
- Contract length
- Procedure for early contract termination, including the fee for early termination of the contract

Offers and green energy offers studied

- The 4 energy suppliers offer **a total of 16 household electricity offers, 2 household natural gas offers but no household mix electricity and gas offers in the country**
- 0 out of 4 energy suppliers offer **'100% green offers'**
- 0 out of 4 energy suppliers offer **self-generation offers**



Bundled offers

3 out of 4 energy suppliers studied offer **16 bundled services in total** (2 energy suppliers offer 3 bundled services each and 1 energy supplier offers 10 bundled services)

Sample Review performed by Deloitte on 4 energy suppliers

**Covers only an extract of the national legal requirements. Details can be found in the draft final report*

Switching fees and contract termination fees

According to the Electricity Market Law, 01/07/2007, Art. 35 1°:

- The supplier must apply the switching within 3 weeks after the consumer's request

There are **no requirements included in the national legislation** on:

- Switching fees
- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching


- 1 out of 4 suppliers studied **apply switching fees**
- 3 out of 4 suppliers studied **provide information regarding switching on their website**







Price Comparison Tools (PCTs)

General overview

2
 There are 2 Price Comparison tools in Latvia in total (sample of 2 PCTs studied)

 2 out of 2 PCTs studied are privately owned

 There is no certification body nor scheme in Latvia

0 out of 2
 PCTs clearly state on their websites to cover 100% of the energy market in Latvia in terms of energy suppliers and available offers, based on a sample of 2 PCTs

Market coverage

- Out of 2 privately owned PCTs studied:
- 1 PCT covers 6 suppliers and 100% of the energy market in terms of offer
 - 1 PCT covers 7 suppliers and 100% of the energy market in terms of offer

Business model

- 0 out of 2 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 1 out of 2 PCTs studied display information as regards the **source of data** presented on their websites
- 0 out of 2 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 0 out of 2 PCTs studied present information regarding **the switching procedures** of their websites
- 2 out of 2 PCTs studied explain **how often data** presented on their websites is **being updated**
- 0 out of 2 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 2 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT sends a survey to consumers to rate the website and in turn reviews the comments that its consumers send to its customer service

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- By price

In addition**

- Payment method
- Contract duration

The **first results pages**** on the PCT websites show per offer at a minimum:

- | | |
|-------------------|---------------------|
| • Supplier name | • Price |
| • Tariff name | • Contract duration |
| • Supplier's logo | |

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract duration

In addition**

- Savings per year by choosing this tariff
- Monthly consumption allowance



*Based on a sample of 2 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



0 out of 4

Energy suppliers explain the content of their bills on their website



0 out of 4

Energy suppliers provide an explanation of the price breakdown on their websites



Not applicable as no example bill is available on the websites of the 4 energy suppliers studied

Legal requirements

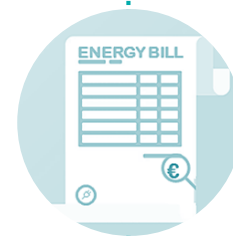
The Provision on information for end users of electricity and natural gas (09/03/17 N. 55 (5882)), Art. 2 regulates the energy bills for electricity and gas suppliers and the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Name of the product
- Amount of energy delivered during the billing period
- Energy price for the billing period
- Price breakdown and fees
- Where to find information on: how to request consumption information in the last 24 months, energy mix, environmental impact, dispute resolution tools

Frequency of consumption statement

The Provision on information for end users of electricity and natural gas (09/03/17 N. 55 (5882)) ensures that the consumers receive **at least one annual statement** presenting their consumption





EU and national Regulatory Framework

LATVIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Noteikumi par informāciju elektroenerģijas un dabasgāzes galalietotājiem, 09/03/17

Provisions on information for end users of electricity and natural gas

Energoefektivitātes likums, 27/03/16

Energy efficiency law

Elektroenerģijas tirdzniecības un lietošanas noteikumi, 21/03/2014

Electricity trading and usage regulations

Elektroenerģijas tirgus likums, 25/05/2005

Electricity market law

Noteikumi par informāciju elektroenerģijas un dabasgāzes galalietotājiem, 04/12/14

Regulation for information provided to electricity and gas end-users

Subsidētās elektroenerģijas nodokļa likums, 17/12/2013

Subsidized electricity tax law

ALTERNATIVE DISPUTE RESOLUTION

Patērētāju tiesību aizsardzības likums, 01/04/1999

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | LATVIA

Main bodies and contact details

Energy Regulator	Public Utilities Commission 45 Unijas street, Riga, LV-1039 Website: https://sprk.gov.lv/udenssaimnieciba/	
Single Point of Contact	Single state and local government portal State Regional Development Agency Riga, Alberta Street 10, LV-1010 Website: http://www.latvija.lv	
Price Comparison Tools	Energija24.lv Website: https://nergija24.lv	Elektroenergija.lv Website: https://elektroenergija.lv
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Consumer Rights Protection Centre K. Valdemara street 157, Riga, LV-1013 Website: https://ptac.gov.lv/page/251	
Body with responsibilities relating to competition	Competition Council Brivibas street 55, Riga, LV-1010 Website: https://kp.gov.lv/?objets_id=599	
Alternative Dispute Resolution Entity	The Consumer Rights Protection Centre and the Public Utilities Commission deal with dispute settlement. There is no separate body with ombudsman services	
Other relevant bodies and consumer organisations	Latvian National Association for Consumer Protection Brivibas street 55-431, Riga, LV-1519 Website: https://pateretajs.lv	



COUNTRY FICHE

LITHUANIA

Key take-aways

This section presents a general summary of the key observations for Lithuania on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Lithuanian and sometimes English
On average, 19 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 19 tariffs, 10 household electricity offers, 4 household natural gas offers, 0 household mix electricity and gas offers, 1 '100% green offers' and 4 self-generation tariffs are offered
- 1 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Law on Electricity (No VIII-1881, Art. 51) iLaw on Electricity of the Republic of Lithuania No VIII-1881 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

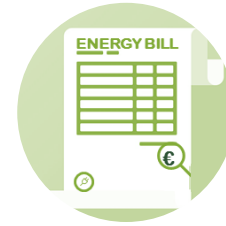
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Law on Electricity, 20/0/2000, Art. 45
- No specific requirements are included in the national legislation on contract termination fees
- Information on switching and contract termination is provided to customers on the National Commission for Energy Control and Prices' website
- The Regulator survey showed that energy suppliers must provide information to consumers via their website on energy switching



Price Comparison Tools

- There is 1 Price Comparison tool in Lithuania (sample of 1 PCT studied)
- 1 out of 1 PCT studied is owned by the National Commission for Energy Control and Prices (NCECP)
- There is no certification body nor scheme in Lithuania
- 0 out of 1 PCT clearly states on its website to cover 100% of the energy market in Lithuania in terms of energy suppliers and available offers, based on a sample of 1 PCT



Energy Bills

- The Law on Energy of the Republic of Lithuania No. IX-884 and the Law on Electricity of the Republic of Lithuania No VIII-1881 regulate the energy bills for electricity and gas suppliers
- No regulation on billing frequency was found at the time of the study. The Regulator indicated in the Regulator survey that consumers have to submit their consumption of energy on a monthly basis to their suppliers





Pre-contractual Information

General overview



The offers are usually presented in Lithuanian and sometimes English



19

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



1 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements

According to the Law on Electricity (No VIII-1881, Art. 51) iLaw on Electricity of the Republic of Lithuania No VIII-1881, domestic consumers have the right to choose a supplier freely and free of charge and should receive the following information from their suppliers:

- The supplier's name, home address, company code and legal form
- The services provided and conditions for their provision, prices and tariffs for services and electricity
- The methods of calculating the prices
- The terms of the contracts, the contract termination details
- Procedures for dispute settlement

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **10 household electricity offers**, **4 household natural gas offers** and **0 household mix electricity and gas offers**
- 1 out of 6 energy suppliers offers **1 '100% green offers' in total**
- 1 out of 6 energy suppliers offers **4 self-generation offers in total**

Bundled offers

0 out of 6 energy suppliers studied offer **self-generation offers**



Switching fees and contract termination fees

According to the Law on Electricity, 20/0/2000, Art. 45:

- The supplier must apply the switching within 2 weeks after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 3 weeks after the consumer's request

There are **no requirements included in the national legislation** on:

- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 2 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Information on switching and contract termination is provided to customers on the National Commission for Energy Control and Prices' website

The Regulator reported in the Regulator survey that energy suppliers must provide information to consumers via their website on energy switching





Price Comparison Tools (PCTs)

General overview



1

There is 1 Price Comparison tool in Lithuania (sample of 1 PCT studied)



1 out of 1 PCT studied is owned by the National Commission for Energy Control and Prices (NCECP)



There is no certification body nor scheme in Lithuania



0 out of 1

PCT clearly states on its website to cover 100% of the energy market in Lithuania in terms of energy suppliers and available offers, based on a sample of 1 PCT

Market coverage

Out of 1 PCT provided by the national Regulator:

- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 0 out of 1 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 1 PCTs studied display information as regards the **source of data** presented on their websites
- 0 out of 1 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 1 out of 1 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 1 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 1 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 1 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Energy mix
- Time of use

The **first results page**** on the Regulator PCT website shows per offer:

- Supplier name
- Link to supplier's websites
- Link to detailed offers
- Supplier's logo
- Price including VAT for the selected period, in Euro and Lithuanian Litas



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT website:

At a minimum

- General customer information
- Payment methods
- Switching fee
- Energy sources
- Renewable energy

*Based on a sample of 1 PCT

**In addition, the website includes other details



Energy Bills

General overview



0 out of 6

Energy suppliers explain the content of their bills on their website



0 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



Not applicable as no example bill is available on the websites of the 6 energy suppliers studied

Legal requirements

The Law on Energy of the Republic of Lithuania No. IX-884 and the Law on Electricity of the Republic of Lithuania No VIII-1881 regulate the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Supplier contact details and reference
- Customer details
- Services offers
- The amounts of the services offers
- VAT

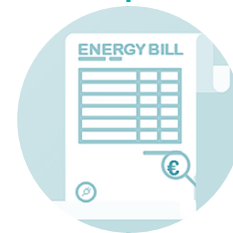
Frequency of consumption statement

According to the Regulator Survey, consumers have to submit their consumption of energy on **a monthly basis** to their suppliers

Agreements can be made between consumers and their suppliers in order to change the frequency of declaration of consumption

Initiatives, non-binding measures and guidance documents

According to the Regulator Survey, the Regulator does not cooperate with organisations as to improve the bill design





EU and national Regulatory Framework

LITHUANIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Law on Renewable Energy No XI-1375 as last amended on 10/09/2017

On the state management, regulation, supervision and control of activities in the energy sector of renewable resources, the legal framework of the organization, as well as on the networks of energy operators

Law on Energy No IX-884, Law of 16/05/2002, as last amended on 18/07/2017

On the establishment of the main aims of energy activities as well as the legal basis of state management, regulation, supervision and control of the energy sector, the general criteria, conditions of and requirements for public relations, and the main areas of state energy policy

Law on Electricity No VIII-1881 as last amended on 17/07/2017

On the organization of the electricity sector governance, regulation, supervision, control and operations in the electricity sector, and also regulate relationship between the institutions and the national electricity sector in the areas of electricity generation, transmission, distribution, supply and ensuring of consumers' rights and legitimate interests

Law on Natural Gas No VIII-1973 as last amended on 17/07/2017

On the general principles governing the organization of the natural gas sector and natural gas enterprises and relations with customers

Resolution No 1328 as last amended on 05/07/2017

On approval of the program for improving energy efficiency of public buildings

Law on Value-Added Tax No IX-751 as last amended on 01/01/2017

Law No 1-115, as last amended on 08/03/2016

On new natural gas systems, direct lines and biogas production equipment for connection to the natural gas transmission or distribution systems

Law on the Approval of the Procedures for the Promotion of Energy Resources for Energy Production No 827 of 04/07/2015

Law on the Approval of Licensing Rules in the Electricity Sector No 723 as last amended on 03/03/2015

Law on the Prohibition of Unfair Business-to-Consumer Commercial Practices No X-1409 of 01/01/2015

On consumer rights, spheres of the protection of consumer rights, lay down an institutional system of the protection of consumer rights, the competence of the authorities of the protection of consumer rights, regulate the education of consumers, relations of consumers and sellers, suppliers of services, the protection of consumer rights out of court and the liability for violations of the legal acts regulating the protection of consumer rights

ALTERNATIVE DISPUTE RESOLUTION

Law on Consumer Protection No I-657 as last amended on 18/11/2016

On consumer rights, spheres of the protection of consumer rights, lay down an institutional system of the protection of consumer rights, the competence of the authorities of the protection of consumer rights, regulate the education of consumers, relations of consumers and sellers, suppliers of services, the protection of consumer rights out of court and the liability for violations of the legal acts regulating the protection of consumer rights

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | LITHUANIA

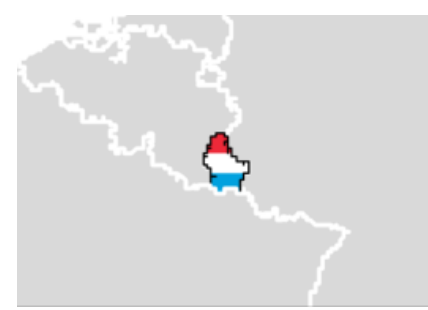
Main bodies and contact details

Energy Regulator	National Commission for Energy Control and Prices (NCC) Verkiu St. 25C-1, LT-08223 Vilnius Website: http://www.regula.lt/en/Pages/default.aspx		
Single Point of Contact	National Commission for Energy Control and Prices (NCC)		
Price Comparison Tool	Skaiciuokle Website: https://skaiciuokle.regula.lt/		
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	State Consumer Rights Protection Authority Vilnius Str. 25, LT-01119 Vilnius Website : http://www.vartotojoteises.lt		
Body with responsibilities relating to competition	Competition Council Jogaiéprs Str. 14, LT-01116 Vilnius Website: http://www.kt.gov.lt/en/		
Alternative Dispute Resolution Entity	National Commission for Energy Control and Prices (NCC)		
Other relevant bodies and consumer organisations	Nacionaline vandens, elektros ir silumos vartotoju gynimo lyga (National League for Protection of Consumers of Gas, Electricity and Heating) Gyneju Str. 4-320, LT-01109 Vilnius Website: http://www.vartotojulyga.lt	Nacionaline vartotoju konfederacija (National Consumer Confederation) Stikliu g. 8-01131 Vilnius Website: http://www.vartotojai.eu	Alliance of Lithuanian Consumers Egle Kybartiene aljansas T. Vrublevskio g. 4-11318 Vilnius Website: http://www.lvoa.lt



COUNTRY FICHE

LUXEMBOURG



Key take-aways

This section presents a general summary of the key observations for Luxembourg on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in French and sometimes in German and English
- On average 45 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 45 tariffs, 19 household electricity offers, 7 household natural gas offers, 3 household mix electricity and gas offers, 14 '100% green offers' and 2 self-generation tariffs are offered
- 5 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The amended law of 1 August 2007 relating to the organization of the gas market, Art. 2 (5) and the Luxembourg Consumer Code, Art. L.113-1 regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

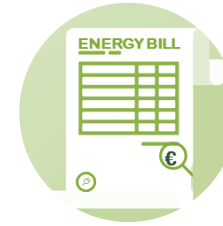
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the 1st of August, 2007 Law, Art. 19(4)
- No specific requirements are included in the national legislation on contract termination fees
- The Institut Luxembourgeois de Régulation published a practical guide aimed at helping customers understand the procedure of switching energy suppliers*



Price Comparison Tools

- There is one Price Comparison tool in Luxembourg in total (sample of 1 PCT studied)
- 1 out of 1 PCT studied is owned by the national Regulator (Luxembourgish Regulator (ILR))
- There is no certification body nor scheme in Luxembourg
- 1 out of 1 PCT clearly states on its website to cover 100% of the energy market in Luxembourg in terms of energy suppliers and available offers, based on a sample of 1 PCT



Energy Bills

- The amended law of 1 August 2007 relating to the organization of the gas market, Art. 12 and the Luxembourg Consumer Code of 28 December 2016 regulate the energy bills for electricity and gas suppliers
- The amended law of 1 August 2007 relating to the organization of the electricity market, Art. 49 regulates billing frequency
- The Institut Luxembourgeois de Régulation published a practical guide aimed at helping customers understand the content of their energy bill**

*ILR, practical guide, 'Libre choix du fournisseur': <https://assets.ilr.lu/energie/Documents/ILRLU-1685561960-93.pdf>

**ILR, practical guide, 'Ma facture d'électricité': <https://assets.ilr.lu/energie/Documents/ILRLU-1685561960-100.pdf>





Pre-contractual Information

General overview



The offers are usually presented in French and sometimes in German and English



45

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



5 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

The amended law of 1 August 2007 relating to the organization of the gas market, Art. 2 (5) states that the contractual conditions must be transparent, fair, written in clear and understandable language and communicated to the customer **before the conclusion of the contract. Before the consumer is bound by a contract** other than a distance or off-premises contract, or by an offer of the same type, the professional, whether public or private, must provide, in a clear and understandable way, the consumer the following information, as long as it does not appear from the context (Luxembourg Consumer Code, Art. L.113-1):

- The essential characteristics of the goods or services it offers, to the extent appropriate to the used communication medium and the good or service that is/are concerned
- The identity of the trader
- Total price of the goods or services
- Terms of payment
- Contract duration, conditions of termination and renewal

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **19 household electricity offers, 7 household natural gas offers** and **3 household mix electricity and gas offers**
- 6 out of 6 energy suppliers offer **14 '100% green offers' in total** (2 suppliers offer 1 green offer each, 1 supplier offers 2 green offers, 2 suppliers offer 3 green offers each and 1 supplier offers 4 green offers)
- 2 out of 6 energy suppliers offer **2 self-generation offers in total** (2 suppliers offer 1 self-generation offer each)

Bundled offers

0 out of 6 energy suppliers studied offer **bundled services**

Source: National Regulator ILR Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the 1st of August, 2007 Law, Art. 19(4):

- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching
- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 4 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

An **awareness raising campaign on pre-contractual information** was held during the Oeko-Foire in Luxembourg. Press communications and articles were published in the written press

The Institut Luxembourgeois de Régulation published a **practical guide** aimed at helping customers understand the procedure of switching energy suppliers**



**ILR, practical guide, 'Libre choix du fournisseur': <https://assets.ilr.lu/energie/Documents/ILRLU-1685561960-93.pdf>



Price Comparison Tools (PCTs)

General overview



1

There is one Price Comparison tool in Luxembourg (sample of 1 PCT studied)



1 out of 1 PCT studied is owned by the national Regulator (Luxembourgish Regulator (ILR))



There is no certification body nor scheme in Luxembourg



1 out of 1

PCT clearly states on its website to cover 100% of the energy market in Luxembourg in terms of energy suppliers and available offers, based on a sample of 1 PCT

Market coverage

Out of the 1 PCT owned by the national Regulator :

- 1 PCT covers 100% of the energy market in Luxembourg in terms of energy suppliers and available tariffs

Business model

- 0 out of 1 PCT studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 1 PCT studied displays information as regards the **source of data** presented on the website
- 0 out of 1 PCT studied offers consumers the possibility to **directly switch suppliers** from its website
- 1 out of 1 PCT studied presents information regarding **the switching procedures** of its website
- 0 out of 1 PCT studied explains **how often data** presented on its website **is being updated**
- 0 out of 1 PCT studied give consumers **the possibility to give their review of the PCT website**
- 0 out of 1 PCT studied provides an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that the PCT studied bases its **quality assessment on internal assessment tools** (e.g. KPIs, traffic or page views by users, etc.)

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Energy mix
- Estimated consumption of the customer
- Number of individuals present in the household
- Current tariff
- Current supplier
- Location

In addition**

- Online bill

The **first results page** on the PCT website shows per offer:

- Link to offer details
- Contract duration
- Payment methods
- Source of energy
- Annual rate
- Estimated amount of savings
- Supplier name
- Tariff name



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions
- Contract termination conditions
- Payment methods
- % of green energy
- Fee structure

Source: National Regulator IRL Survey

Sample Review performed by Deloitte on 1 Price Comparison Tool

*Based on a sample of 1 PCT

**In addition, the website includes other non-price elements, criteria and details



Energy Bills

General overview



3 out of 6

Energy suppliers explain the content of their bills on their website



3 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 3

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 3 example bills)

Legal requirements

The amended law of 1 August 2007 relating to the organization of the gas market, Art. 12 and the Luxembourg Consumer Code of 28 December 2016 regulate the energy bills for electricity and gas suppliers

According to the national legal framework, **suppliers need to deliver an energy bill that contains the following minimum requirements:**

- Bill layout
- Content of the bill
- Consumption data
- Price format
- Information on switching
- Information on fuel mix
- Frequency of billing
- Payment methods
- Price breakdown

Frequency of consumption statement

The amended law of 1 August 2007 relating to the organization of the electricity market, Art. 49 ensures that:

- The consumers receive a **yearly energy bill** presenting their consumption and cost (e.g. cost of electricity, gas and breakdown of prices)
- **On demand**, customers can receive information regarding their bills **at least once per trimester**

Content

The Luxembourgish Regulator IRL, through the Order no. 88/2015 complements the national legal framework by requiring **energy bills to mention the following elements:**

- Price breakdown
- VAT
- Networking fees
- Taxes and public service obligations

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills:**

- Frequency of billing
- Payment methods
- Media used

The **bills** analysed (sample of 3 example bills) provide usually information on the following elements :

- Supplier's logo
- Supplier details
- Conditions for cancellation
- Information on consumption
- Summary of the bill
- Customer data
- Dates of the meter readings
- Type of meter
- Total price and price breakdown
- Environmental impact of the energy
- Customer information website addresses

0 out of 3 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 3 example bills)

Initiatives, non-binding measures and guidance documents

The Institut Luxembourgeois de Régulation published a practical guide aimed at helping customers understand the content of their energy bill**

The Regulator survey showed that the energy Regulator does not cooperate with organizations as to improve the bill design

**ILR, practical guide, "Ma facture d'électricité":
<https://assets.ilr.lu/energie/Documents/ILRLU-1685561960-100.pdf>





EU and national Regulatory Framework

LUXEMBOURGISH LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Modified law of 01/08/2007 – coordinated text of 30/06/2015

On the organization of the electricity market

Law of 19/06/2015

Amending the law of 1 August 2007 on the organization of the electricity market

Law of 07/08/2012

Amending the law of 1 August 2007 on the organization of the electricity market

Law of 17/12/2010

Imposing taxes on the consumption of electric energy imposing the rights and taxes, particularly on energy products, electricity, manufactured tobacco products, alcohol and alcoholic beverages

APPLICABLE NATIONAL REGULATIONS

Regulation of 24/04/2017 and 23/07/2016

Amending the amended Grand-Ducal Regulation of 1 August 2014 on electricity production based on renewable energy sources, including the production, remuneration and marketing of biogas; the amended Grand-Ducal regulation of 31 March 2010 on the compensation mechanism in the context of the organization of the electricity market

Regulation of 22/06/2016

Concerning the electricity production based on high-efficiency cogeneration

Regulation of 04/03/2016

Concerning the production, remuneration and marketing of biogas

Regulation of 03/12/2015

Concerning public infrastructure linked to electric mobility

Regulation of 07/08/2015

Concerning the functioning of the Energy Efficiency Obligations Mechanism

Ministerial regulation of 13/10/2014

Concerning the setting of the correction factor X provided for in Article 6 (par. 2) of the amended Grand Ducal Regulation of 31 March 2010 on the compensation mechanism in the framework of the electricity market organization

Regulation of 27/08/2014

Concerning the methods and conditions of electric energy and natural gas meters

Regulation of 19/05/2013

Concerning the authorizations for the natural gas supply

Regulation of 21/06/2010

Concerning the electricity labelling system

Regulation of 22/12/2006

Concerning the measures aiming at ensuring the exact comprehension of the tax on the consumption of energy and natural gas to the bails covering the risks inherent in the release for consumption of electricity or natural gas, and on the measures granting terms of payment

Consumer Code

The Consumer Code came into force on April 18th, 2011. The purpose of this Code is to facilitate the understanding of the existing consumer laws by gathering them and structuring them

ALTERNATIVE DISPUTE RESOLUTION

Law of 17/02/2016

Introducing alternative dispute resolution into the Consumer Code (published in the official gazette (Mémorial A) on 14 April 2016)

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

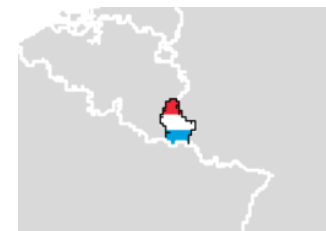
Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | LUXEMBOURG

Main bodies and contact details

Energy Regulator	Institut Luxembourgeois de Régulation (ILR) 17,rue du Fossé L-1536 Luxembourg Website: http://web.ilr.lu/FR/ILR
Single Point of Contact	Union Luxembourgeoise des consommateurs (UCL) Rue des Bruyères 55, L-1274 Howald Website: http://www.ulc.lu
Price Comparison Tool	Calculix Website: http://calculix.lu/web/tk/tk
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Conseil de la concurrence / Competition Council 19 – 21 boulevard Royal, L-2449 Luxembourg Website: http://concurrence.public.lu/fr.html
Body with responsibilities relating to competition	Conseil de la concurrence / Competition Council
Alternative Dispute Resolution Entity	Institut Luxembourgeois de Régulation (ILR)
Other relevant bodies and consumer organisations	Union Luxembourgeoise des consommateurs (ULC) / Luxembourgish Union of Consumers 55 rue des Bruyères L-1274 Howald Website: http://www.ulc.lu/fr/



COUNTRY FICHE

MALTA



Key take-aways

This section presents a general summary of the key observations for Malta on the topics highlighted below



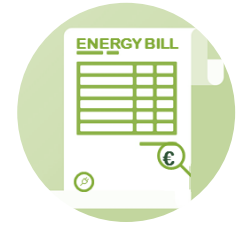
Pre-contractual Information Offers

- The offers are presented most of the time in Maltese and English
- On average, 5 tariffs are offered on the energy suppliers’ websites, based on a sample of 1 supplier
- Out of these 5 tariffs, 5 household electricity offers, 0 household natural gas offers, 0 household mix electricity and gas offers, 0 ‘100% green offers’ and 0 self-generation tariffs are offered
- 0 out of 1 supplier provides detailed information regarding renewable energy sources on its website, based on a sample of 1 supplier
- The Subsidiary Legislation 545.13 (Regulation 8), ‘Electricity Market Regulations’ and L.N. 439 of 2013 and Consumer Rights Regulations regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers



Price Comparison Tools

- There are no Price Comparison tools for the energy market in Malta



Energy Bills

- The Electricity Market Regulations (S.L. 545.16), Art. 8(3) regulates the energy bills for electricity and gas suppliers
- The Electricity Market Regulations (S.L. 545.16), Art. 8(3) regulates billing frequency





Pre-contractual Information

General overview



The offers are presented in Maltese and English



5

Tariffs are offered on the energy supplier's website, on average, based on a sample of 1 supplier



0 out of 1

Supplier provides detailed information regarding renewable energy sources on its website, based on a sample of 1 suppliers

Switching fees are not applicable as there is only one supplier in Malta

Legal requirements*

According to the Subsidiary Legislation 545.13 (Regulation 8), the 'Electricity Market Regulations' and L.N. 439 of 2013 and the Consumer Rights Regulations, conditions shall be fair and well-known in advance. In any case, this information should be provided prior to the conclusion or confirmation of the contract. Where contracts are concluded through intermediaries, the information relating to the matters set out in this item shall also be provided prior to the conclusion of the contract

The consumers have a right to a contract with their electricity service provider that specifies:

- The identity and address of the supplier
- The services provided, the service quality levels offered
- The time for the initial connection
- The types of maintenance service offered
- The means by which up-to-date information on all applicable tariffs and maintenance charges may be obtained
- The duration of the contract, the conditions for renewal and termination of services and of the contract and whether withdrawal from the contract without charge is permitted
- Any compensation and the refund arrangements which apply if contracted service quality levels are not met, including inaccurate and delayed billing

Offers and green energy offers studied

- The energy supplier offers a total of **5 household electricity offers, 0 household natural gas offers** and **0 household mix electricity and gas offers**
- 0 out of 1 energy supplier offers '**100% green offers**'
- 0 out of 1 energy supplier offers **2 self-generation offers**



Bundled offers

1 out of 1 energy supplier studied offers **6 bundled services in total**

Source: National Regulator "Regulator of Energy and Water Services" Survey

Sample Review performed by Deloitte on 1 energy supplier

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

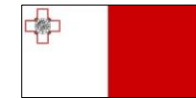
According to the Consumer Rights Regulations 2013, Part III, Art.5(1)

- Contract termination is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination





Price Comparison Tools (PCTs)

General overview



There are no Price Comparison tools in Malta



Energy Bills

General overview



1 out of 1

Energy supplier explains the content of their bills on its website



1 out of 1

Energy supplier provides an explanation of the price breakdown on its website



Not applicable as there is only one supplier in Malta

Legal requirements

The Electricity Market Regulations (S.L. 545.16), Art. 8(3) regulate the energy bills for electricity and gas suppliers

According to the national legal framework, Enemalta Corporation, Malta's electricity supplier, needs to issue an energy bill that contains the following minimum requirements:

- Information about fuel mix, energy sources and their environmental impact
- Information about customer rights, including dispute procedures
- Current actual prices and actual consumption of energy
- Comparisons of the final customer's current energy consumption with consumption for the same period in the previous year, preferably in graphic form
- Information on available energy efficiency improvement measures and energy agencies or similar bodies

Frequency of consumption statement

The Electricity Market Regulations (S.L. 545.16), Art. 8(3) ensures that the consumers receive a statement of actual consumption **at least once a year** and that billing information is available **at least quarterly**

Consumers also receive **at least two bills per year** based on actual readings showing consumption, with calculation including tariffs, and the amount to be paid. In addition, consumers are provided with smart meters bills with the aforementioned information every 60 days

On demand, customers can also receive the information and documents above



Content

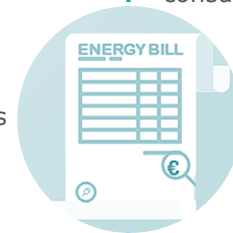
The **bill** analysed (sample of 1 example bills) usually provide information on the following elements:

- Supplier's logo
- Tariff name
- Duration of the contract
- Summary of the bill
- Customer data
- Information on consumption
- Dates of the meter readings
- Switching code
- Type of meter
- Total price
- Price broken-down
- Complaints and customer service
- Source of energy
- Environmental impact of the energy
- Actual consumption of energy
- Current price of energy



Initiatives, non-binding measures and guidance documents

According to the Regulator survey, the Regulator cooperates with the energy supplier for consulting discussions in the market in relation to bill design





EU and national Regulatory Framework

MALTESE LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Subsidiary Legislation 545.13, 'Electricity Market Regulations'

- On the organization and functioning of the electricity market, open access to the market where applicable, the criteria and procedures applicable to calls for tenders and the granting of authorizations and the operation of Systems
- On universal service obligations and the rights of electricity consumers and clarification of competition requirements
- On measures for the safeguarding of security of electricity supply so as to ensure the proper functioning of the market for electricity and to ensure an adequate level of generation capacity, an adequate balance between supply and demand, and an appropriate level of interconnection
- On the protection of consumers in respect of distance contracts and on unfair terms in consumer contracts

Subsidiary Legislation 378.08, 'Distance Selling Regulations'

On the pre-contractual information and transparency requirements from suppliers

L.N. 376 of 2012, Building Regulation Act

On the energy performance of buildings

Subsidiary Legislation 545.16, 'Energy Efficiency and Cogeneration Regulations'

On the promotion of energy efficiency

Subsidiary Legislation 545.12, 'Natural Gas Legislation Regulations'

On the rules relating to the organization and functioning of the natural gas sector, access to the market, the criteria and procedures applicable to the granting of authorizations for distribution, supply and storage of natural gas and the operation of systems

L.N. 439 of 2013, Consumer Rights Regulations

Introducing rights related to pre-contractual and contracts information and right of withdrawal into the Consumer Affairs Act

Consumer Affairs Act (Laws of Malta, Chapter 378)

- On the promotion and protection of consumer interests, the establishment of minimum service and price standards for the trade of good and services, rules of practices
- On the regulation of distance selling arrangements
- On consumer rights and supplier transparency
- Consumer Alternative Dispute Resolution
- Unfair contract terms and commercial practices

ALTERNATIVE DISPUTE RESOLUTION

The Consumer Alternative Dispute Resolution Regulation

Introducing alternative dispute resolution into the Consumer Affairs Act

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | MALTA

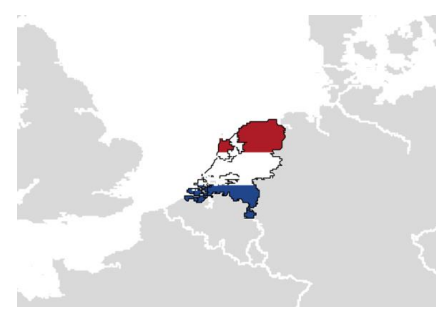
Main bodies and contact details

Energy Regulator	Regulator for Energy and Water Services Millennia, 2nd Floor, Aldo Moro Road – Marsa 9065 Website: http://www.rews.org.mt/	
Single Point of Contact	Not found at the time of the study	
Price Comparison Tool	Not applicable	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Malta Competition and Consumer Affairs Authority (MCCAA) Mizzi House, National Road - Blata I-Bajda HMR9010 Website: http://mccaa.org.mt/	
Body with responsibilities relating to competition	Malta Competition and Consumer Affairs Authority (MCCAA)	
Alternative Dispute Resolution Entity	European Consumer Centre Malta (ECC Net) Consumer House No. 47A, South Str.Valletta VLT 1101Malta Website: http://eccnetmalta.gov.mt/	Malta Arbitration Centre/Ombudsman Office of the Ombudsman 11, St Paul Street, Valletta VLT 1210 Website: http://www.ombudsman.org.mt
Other relevant bodies and consumer organisations	The Malta Consumer’s Association Ghaqda Tal-Konsumaturi 47A South Street - 1101 Valletta Website: www.camalta.org.mt	



COUNTRY FICHE

NETHERLANDS



Key take-aways

This section presents a general summary of the key observations for the Netherlands on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in Dutch and sometimes in German and English
- On average, 97 tariffs are offered on the energy suppliers' websites, based on a sample of 7 suppliers
- Out of these 97 tariffs, 20 household electricity offers, 14 household natural gas offers, 22 household mix electricity and gas offers, 30 '100% green offers' and 11 self-generation tariffs are offered
- 6 out of 7 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 7 suppliers
- The Electricity Act 1998, Art. 95m and the Provision of information in the consumer energy market, ACM, regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

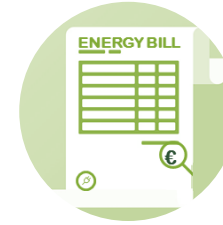


Price Comparison Tools

Switching fees & Contract termination fees

- Switching and contract termination* are free of charge as ensured by the Electricity Act 1998, Art. 86g and 95 m
- The Authority for Consumer and Markets published a guide aimed at helping suppliers understand the procedure of switching energy suppliers**
- A consumer organisation (Consumentenbond) conducted a collective switching campaign***

- There are 25 Price Comparison tools in the Netherlands in total (sample of 5 PCTs studied)
- 5 out of 5 PCTs studied are privately owned
- There is no certification body nor scheme in the Netherlands
- 0 out of 5 PCTs clearly state on their websites to cover 100% of the energy market in the Netherlands in terms of energy suppliers and available offers, based on a sample of 5 PCTs



Energy Bills

- The Electricity Act, Art. 95 regulates the energy bills for electricity and gas suppliers
- The Electricity Act, Art. 95 regulates billing frequency
- The Dutch Energy Regulator published a practical guide detailing the minimum bill features****

*Applicable to non-fixed term contracts only

**ACM, 'Provision of information in the consumer energy market': https://www.acm.nl/sites/default/files/old_publication/publicaties/15991_informatievoorziening-energie-spelregels-en.pdf

***BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf

****Practical guide on energy market regulations: https://www.acm.nl/sites/default/files/old_publication/publicaties/15991_informatievoorziening-energie-spelregels-en.pdf





Pre-contractual Information

General overview



The offers are presented in Dutch and sometimes in German and English



97

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 7 suppliers



6 out of 7

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 7 suppliers



3 out of 7

Suppliers apply switching fees, based on a sample of 7 suppliers

Legal requirements*

According to the Electricity Act 1998, Art. 95m and the Provision of information in the consumer energy market, ACM, the conditions attached to an agreement with a customer are transparent, fair and known in advance. The conditions are in any case provided before the conclusion of the contract and are stated in a clear and understandable language

The information below must be provided before a contract can be concluded or before the consumer placed an order and shall be provided in a clear, intelligible and unambiguous manner:

- The identity of the provider, its trade name and geographical address
- If the provider is not the supplier, the provider is required to state the identity and geographical address of the supplier taking responsibility for the supply as well
- The name of the license holder, if this is different from the provider's name
- The duration of the contract
- A description of what will be supplied

Offers and green energy offers studied

- The 7 Energy Suppliers offer a total of **20 household electricity offers, 14 household natural gas offers** and **22 household mix electricity and gas offers** in the country
- 7 out of 7 energy suppliers offer **30 '100% green offers' in total** (3 suppliers offer 2 green offers each, 1 supplier offers 3 offers, 2 suppliers offer 6 offers each and 1 supplier offers 9 offers)
- 6 out of 7 energy suppliers offer **11 self-generation offers in total** (2 suppliers offer 1 self-generation offer each, 3 suppliers offer 2 self-generation offers each and 1 supplier offers 3 self-generation offers)



Bundled offers

4 out of 7 energy suppliers offer **12 bundled services in total** (3 suppliers offer 1 bundled service each and 1 supplier offers 9 bundled services)

Sample Review performed by Deloitte on 7 energy supplies

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

According to the Electricity Act 1998, Art. 86g and 95 m:

- The supplier must apply the switching within 1 month after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 30 days after the consumer's request
- Contract termination is free of charge**

Practices in the energy market in relation to switching

- 3 out of 7 suppliers studied **apply switching fees**
- 7 out of 7 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Authority for Consumer and Markets published a guide aimed at helping suppliers understand the procedure of switching energy suppliers***

A consumer organisation (Consumentenbond) conducted a collective switching campaign****

**Applicable to non-fixed term contracts only

***ACM, 'Provision of information in the consumer energy market':

https://www.acm.nl/sites/default/files/old_publication/publicaties/15991_informatievoorziening-energie-spelregels-en.pdf

****BEUC, The European Consumer Organisation, Collective energy switch:

http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf





Price Comparison Tools (PCTs)

General overview



25

There are 25 Price Comparison tools in the Netherlands (sample of 5 PCTs studied)



5 out of 5 PCTs studied are privately owned



There is no certification body nor scheme in the Netherlands



0 out of 5

PCTs clearly state on their websites to cover 100% of the energy market in the Netherlands in terms of energy suppliers and available offers, based on a sample of 5 PCTs

Market coverage

Out of 5 privately owned PCTs studied:

- 3 PCTs cover all the energy market in terms of suppliers and do not clearly indicate their market coverage in terms of offers
- 2 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 4 out of 5 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 1 out of 5 PCTs studied display information as regards the **source of data** presented on their websites
- 5 out of 5 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 2 out of 5 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 5 PCTs studied explain **how often data** presented on their websites **is being updated**
- 3 out of 5 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 5 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT sends to its consumers a survey to rate the website and reviews the comments that its consumers send to its consumers service

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Contract duration
- Energy mix

In addition**

- % Green energy
- Fix or variable tariff
- Supplier

The **first results pages**** on the PCT websites show per offer at a minimum:

- Price per month
- Annual rate
- Reviews
- Suppliers and tariffs names
- Tariff type
- Source of energy



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- % of green energy
- Contract conditions

In addition**

- 100% online tariff
- Contract termination conditions
- Fee structure



Energy Bills

General overview



6 out of 7

Energy suppliers explain the content of their bills on their website



1 out of 7

Energy supplier provides an explanation of the price breakdown on its website



0 out of 6

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 6 example bills)

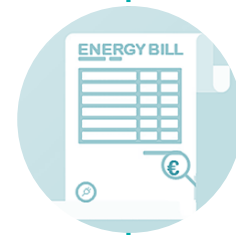
Legal requirements

The Electricity Act, Art. 95 regulates the energy bills for electricity and gas suppliers. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- The period that the bill covers
- The total consumption
- The electricity or gas tariff at which the energy was supplied (these tariffs must include taxes and surcharges)
- The consumption and consumption breakdown
- The fixed costs, such as fixed supply costs and grid operation costs
- The energy tax rebate
- The total amount that the customer will receive or needs to pay (after deduction of the instalment payments)

Frequency of consumption statement

The Electricity Act, Art. 95 ensures that the consumers receive **at least one annual statement** presenting their consumption and monthly invoices



Content

The **bills** analysed (sample of 6 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Type of meter
- Origin of the energy
- Customer data
- Information on the electricity consumption
- Dates of the meter readings
- Price breakdown
- Claims and customer service



0 out of the 6 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 6 example bills)

Initiatives, non-binding measures and guidance documents

The Dutch Energy Regulator published a practical guide detailing minimum bill features*

*Practical guide on energy market regulation including minimum bill features:
https://www.acm.nl/sites/default/files/old_publication/publicaties/15991_informatievoorziening-energie-spelregels-en.pdf



EU and national Regulatory Framework

DUTCH LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Sections 6:193a-193j BW

Provisions concerning unfair commercial practices

Sections 6:230g et seq. BW

Provisions concerning agreements between traders and consumers

Sections 6:231-247 BW

Provisions concerning unfair terms

Sections 3:15a-f, 6:227a-c BW

Provisions concerning electronic commerce

Vergunning levering elektriciteit aan kleinverbruikers, 8/05/2013

Regulates energy supply for small consumers

Dutch Electricity Act 1998: chapter 8, § 1b and c

Concerning consumer protection

Dutch Gas Act: chapter 5, § 5.2a, 1998

Concerning metering device requirements, invoicing and provision of information

Dutch Gas Act: chapter 5, § 5.3a, 1998

Concerning consumer protection

ALTERNATIVE DISPUTE RESOLUTION

Wetsvoorstel implementatie richtlijn ADR consumentengeschillen, 09/07/2015

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law

Source: National Regulator ACM website

https://www.acm.nl/sites/default/files/old_publication/publicaties/15991_informatievoorziening-energie-spelregels-en.pdf

Former Deloitte study on European energy regulations



NOTES | NETHERLANDS

Main bodies and contact details

Energy Regulator	Autoriteit Consument & Markt (Authority for Consumer and Markets) Muzenstraat 41, 2511 WB Den Haag Website: http://www.acm.nl/nl	
Single Point of Contact	ConsuWijzer Postbus 16326, 2500 BH Den Haag Website: http://www.consuwijzer.nl	
Price Comparison Tools	Energieprijzen.Net Website: http://energieprijzen.net	Prijsvergelijk Website: http://prijsvergelijk.nl/
	Energieleveranciers Website: http://energieleveranciers.nl/	
	Energieprijzen Vergelijken Website: http://energievergelijken.nl/	Gaslicht Website: http://gaslicht.com/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Autoriteit Consument & Markt (Authority for Consumer and Markets) Muzenstraat 41, 2511 WB Den Haag Website: http://www.acm.nl/nl	
Body with responsibilities relating to competition	Autoriteit Consument & Markt (Authority for Consumer and Markets)	
Alternative Dispute Resolution Entity	Autoriteit Consument & Markt (Authority for Consumer and Markets) Muzenstraat 41, 2511 WB Den Haag Website: http://www.acm.nl/nl	
Other relevant bodies and consumer organisations	Consumentenbond Enthovenplein 1 – Postbus 1000, 2500 BA Den Haag Website: http://consumentenbon.net	



COUNTRY FICHE

POLAND

Key take-aways

This section presents a general summary of the key observations for Poland on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Polish and sometimes in English
- On average, 41 tariffs are offered on the energy suppliers' websites on average, based on a sample of 6 suppliers
- Out of these 41 tariffs, 13 household electricity offers, 6 household natural gas offers, 1 household mix electricity and gas offers, 1 '100% green offers' and 20 self-generation tariffs are offered
- 4 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Act on Consumer Rights, Art 12 (30 May 2014) regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

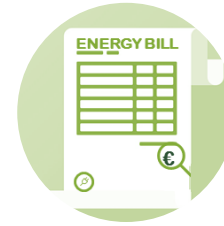
Switching fees & Contract termination fees

- Switching and contract termination are free of charge as ensured by the Energy Law, 10/04/1997, Art. 4j. 6, Energy Law, 10/04/1997, Art. 3 and 3a and the Code of Conduct for Electricity Suppliers of 25 December 2014
- The national Regulator (Polish Energy Regulatory Office) conducted a collective switching campaign*



Price Comparison Tools

- There are 8 Price Comparison tools in Poland in total (sample of 6 PCTs studied)
- 1 out of 6 PCTs studied is owned by the Regulator (Valstybine Kainu ir Energetikos Kontroles Komisija) and 5 out of 6 PCTs studied are privately owned
- There is no certification body nor scheme in Poland
- 0 out of 6 PCTs clearly state on their websites to cover 100% of the energy market in Poland in terms of energy suppliers and available offers, based on a sample of 6 PCTs



Energy Bills

- The Act on VAT, art. 106e.1 regulates the energy bills for electricity and gas suppliers
- The Regulation of the Minister of Economy of 18 August, paragraph 32 and 35 and the Regulation of the Minister of Economy of 23 June 2013, paragraph 37 regulate billing frequency





Pre-contractual Information

General overview



The offers are presented in Polish and sometimes in English



41

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



4 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Act on Consumer Rights, Art 12 (30 May 2014), suppliers are required to provide the following information, in a clear and understandable manner, at the latest when the consumer expresses the intention to conclude the contract:

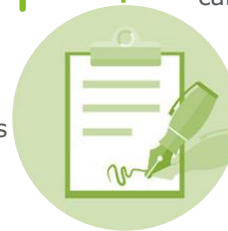
- The purpose of the contract including its subject
- The means of communication with the consumer
- Identity of the trader, the licensing body and the license number
- Address of the trader, his email address, phone and fax number if available
- Address for complaints
- The total price of the service including taxes, as well as the costs of transport, delivery and other charges
- The costs of using the mechanism of distance communication as long as they are higher than the usual costs of this mechanism

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **13 household electricity offers, 6 household natural gas offers** and **1 household mix electricity and gas offers**
- 1 out of 6 energy suppliers offer **1 '100% green offers' in total**
- 6 out of 6 energy suppliers offer **20 self-generation offers** (1 supplier offers 2 self-generation offers, 2 suppliers offer 3 self-generation offers each and 3 suppliers offer 4 self-generation offers each)

Bundled offers

4 out of 6 energy suppliers studied offer **13 bundled services in total** (1 energy supplier offers 1 bundled service, 1 energy supplier offers 3 bundled services, 1 energy supplier offers 4 bundled services and 1 energy supplier offers 5 bundled services)



Switching fees and contract termination fees

According to the Energy Law, 10/04/1997, Art. 4j. 6, Energy Law, 10/04/1997, Art. 3 and 3a and the Code of Conduct for Electricity Suppliers of 25 December 2014:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 21 days after the consumer's request
- Contract termination is free of charge

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 4 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The National Regulator (Polish Energy Regulatory Office) conducted a collective switching campaign**



Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

**Energiarazem, 'Akcja Energia Razem 2015/2016 dobiegła końca!': <http://www.energiarazem.org/>



Price Comparison Tools (PCTs)

General overview



8

There are 8 Price Comparison tools in Poland (sample of 6 PCTs studied)



1 out of 6 PCTs studied is owned by the Regulator (Valstybine Kainu ir Energetikos Kontrolės Komisija) and 5 out of 6 PCTs studied are privately owned



There is no certification body nor scheme in Poland



0 out of 6

PCTs clearly state on their websites to cover 100% of the energy market in Poland in terms of energy suppliers and available offers, based on a sample of 6 PCTs

Market coverage

Out of 1 PCT owned by the Regulator (Valstybine Kainu ir Energetikos Kontrolės Komisija):

- The 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Out of 5 privately owned PCTs studied:

- 1 PCT covers 96% of energy suppliers and offers
- 4 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 4 out of 6 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 5 out of 6 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 6 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 6 out of 6 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 6 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 6 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 1 out of 6 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Duration of contract
- Savings per year

In addition**

- Energy mix
- 100% Green energy
- Billing periods

The **first results pages**** on the PCT websites show per offer at a minimum:

- Suppliers' logo
- Discounts
- Link to the offer
- Tariff name
- Contract duration

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Billing period
- Duration of the contract
- Savings per month



*Based on a sample of 6 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



5 out of 6

Energy suppliers explain the content of their bills on their website



4 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 5

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 5 example bills)

Legal requirements

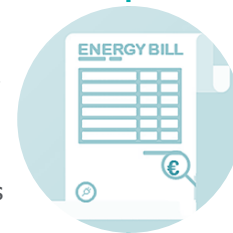
The Act on VAT, art. 106e.1 regulates the energy bills for electricity and gas suppliers. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Date of the bill
- Type of service supplied
- Period that the bill concerns
- Number identifying the bill
- Customer details
- Tax identification of the recipient
- The total units of energy supplied
- Net unit price of energy supplied and total net price
- Total taxes with breakdown for different tax rates
- Total amount due

Frequency of consumption statement

According to the Regulation of the Minister of Economy of 18 August, paragraph 32 and 35 and the Regulation of the Minister of Economy of 23 June 2013, paragraph 37, the data on actual consumption must be provided to consumers with each bill.

The frequency of providing bills to the consumer depends on the tariff, but for most electricity consumers it has to be **at least every two months** and for gas consumers **at least every 12 months**



Content

The **bills** analysed (sample of 5 example bills) usually provide information on the following elements:

- Customer data
- Supplier's logo
- Price breakdown
- Dates of the meter reading
- Supplier's contact details
- Customer's details
- Details of the contract

0 out of the 5 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 5 example bills)





EU and national Regulatory Framework

POLAND LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Ustawa z dnia 30 maja 2014 roku o prawach konsumenta (Act of 30 May 2014)
On consumer rights

Ustawa z dnia 14 września 2012 r. o obowiązkach w zakresie informowania o zużyciu energii przez produkty wykorzystujące energię (Act of 14 September 2012)
On energy information obligations for energy-using products

Ustawa z dnia 15 kwietnia 2011 r. o efektywności energetycznej (Act of April 15, 2011)
On energy efficiency

Unfair Commercial Practices Act of 23rd August 2007

Rozporządzenie Ministra Gospodarki z dnia 4 maja 2007 r. w sprawie szczegółowych warunków funkcjonowania systemu elektroenergetycznego (Ordinance of the Minister of Economy of 4 May 2007)
On detailed conditions for the functioning of the power system

Ustawa z dnia 16 lutego 2007 r. o ochronie konkurencji i konsumentów (Law of 16 February 2007)
On protection of competition and consumers

Energy Law Act of 10th April 1997

APPLICABLE NATIONAL REGULATIONS

Regulation of the Minister of Economy of 18 August 2011 on the principles of assessment and calculation of tariffs and bills in the electric energy market

Regulation of the Minister of Economy of 23 June 2013 on the principles of assessment and calculation of tariffs and bills in the gas market

ALTERNATIVE DISPUTE RESOLUTION

Ustawa z dnia 23 września 2016 r. o pozasądowym rozwiązywaniu sporów konsumenckich (Law of 23 September 2016 on out-of-court settlement of consumer disputes)
Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

SOFT LAWS

The Code of Good Practices of Energy Suppliers, members of the Energy and Petrol Section of the National Chamber of Electronics and Telecommunication

The Code of Good Practices for Suppliers and Distributors of Gas, established by the Office for Energy Regulation

Code of Conduct for Electricity Suppliers of 25 December 2014

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | POLAND

Main bodies and contact details

Energy Regulator	Urząd Regulacji Energetyki / Energy Regulatory Office Al. Jerozolimskie 181, 02-222 Warszawa Website: http://www.ure.gov.pl	
Single Point of Contact	Energy Regulatory Office	
Price Comparison Tools	Enerad Website: http://enerad.pl/sprzedawcy-energii/	Total Money Website: http://www.totalmoney.pl/energia_dom
	Energia Direct Website: http://energiadirect.pl/	Eprad.pl Website: http://www.eprad.pl/
	OptimalEnergy.pl Website: http://optimalenergy.pl/	Urząd Regulacji Energetyki Website: https://www.ure.gov.pl/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Office for Competition and Consumer Protection Plac Pwstancow Warszawy 1 – 00-950 Warszawa Website: http://uokik.gov.pl/	
Body with responsibilities relating to competition	Office for Competition and Consumer Protection	
Alternative Dispute Resolution Entity	Energy Regulatory Office	
Other relevant bodies and consumer organisations	Stowarzyszenie Konsumentów Polskich / Association of Polish Consumers ul. Marcina Kasprzaka 49 01-234 Warszawa Website: http://www.konsumenci.org	Federacja Konsumentów / The Polish Consumer Federation ul. Ordynacka 11 lok.1 PL - 00-364 Warszawa Website: http://www.federacja-konsumentow.org.pl/



COUNTRY FICHE

PORTUGAL



Key take-aways

This section presents a general summary of the key observations for Portugal on the topics highlighted below



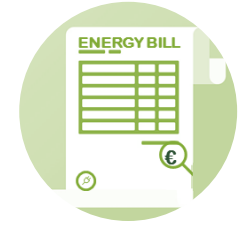
Pre-contractual Information Offers

- The offers are presented most of the time in Portuguese and English
- On average, 16 tariffs are offered on the energy suppliers' websites, based on a sample of 2 suppliers
- Out of these 16 tariffs, 7 household electricity offers, 2 household natural gas offers, 5 household mix electricity and gas offers, 1 '100% green offers' and 1 self-generation tariffs are offered
- 1 out of 2 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 2 suppliers
- The Decree Law n°29/2006, Art. 54, the Code of Commercial Relations (RRC) - Electricity (Art. 105) and Natural gas (Art. 87) and ERSE's Directive 6/2015 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers



Price Comparison Tools

- There are 3 Price Comparison tools in Portugal in total (sample of 2 PCTs studied)
- 1 out of 2 PCTs studied is owned by the Portuguese Regulator (Energy Services Regulatory Authority (ERSE)) and 1 out of 2 PCTs studied is owned by a consumer organization (DECO)
- There is no certification body nor scheme in Portugal
- 1 out of 2 PCTs clearly state on their websites to cover 100% of the energy market in Portugal in terms of energy suppliers and available offers, based on a sample of 2 PCTs



Energy Bills

- The Code of Commercial Relations (RRC) in the Electricity Market, Art. 129 to 131 for electricity and Art. 115 for gas regulates the energy bills for electricity and gas suppliers
- The Code of Commercial Relations (RRC) in the Electricity Market, Art. 129 to 131 for electricity and Art. 115 for gas regulates billing frequency



*ERSE, 'Framework and Codes' page: <http://www.erse.pt/eng/mktsupervision/fwrkcodes/Paginas/default.aspx>

**BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Pre-contractual Information

General overview



The offers are usually presented in Portuguese and English



16

Tariffs are offered on the energy suppliers' websites, in total, based on a sample of 2 suppliers



2 out of 2

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 2 suppliers



0 out of 2

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Decree Law n°29/2006, Art. 54 and the Code of Commercial Relations (RRC) - Electricity (Art. 105) and Natural gas (Art. 87), available energy supply proposals must be accompanied by the general conditions of the applicable contract and should contain at least the following information (Art. 105):

- Full name and supplier contacts
- Duration of the commercial offer and the underlying contract
- Prices and other charges, including the possible existence of price indexations
- Means, terms and conditions of payment of the invoices associated with the contract
- Latest information regarding energy labels

According to ERSE's Directive 6/2015 on pre-contractual and contractual information standards, consumers or their representatives are entitled to receive information on:

- Non-discriminatory information appropriate to specific conditions
- Complete and adequate information to promote energy efficiency

Offers and green energy offers studied

- Green energy offers are not covered nor included in the Portuguese legal framework
- The 2 energy suppliers offer a total of **7 household electricity offers, 2 household natural gas offers** and **5 household mix electricity and gas offers**
- 1 out of 2 energy suppliers offer **1 '100% green offers' in total**
- 1 out of 2 energy suppliers offer **1 self-generation offers**

Bundled offers

2 out of 2 energy suppliers studied offer **7 bundled services in total** (1 supplier offers 3 bundled services and 1 supplier offers 4 bundled services)

Source: National Regulator ERSE Survey

Sample Review performed by Deloitte on 2 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

According to the Decree Law n°29/2006, 15/02/2006, Art. 53 §2:

- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching
- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 2 suppliers studied **apply switching fees**
- 1 out of 2 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Information on switching and contract termination is provided to customers on the 'Framework and Codes' page of the Regulator's website*

A consumer organisation (DECO) conducted a collective switching campaign**



*ERSE, 'Framework and Codes' page:

<http://www.erse.pt/eng/mktsupervision/fwrkcodes/Paginas/default.aspx>

**BEUC, The European Consumer Organisation, Collective energy switch:


http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf








Price Comparison Tools (PCTs)

General overview

3
 There are 3 Price Comparison tools in Portugal

 1 out of 2 PCTs studied is owned by the Portuguese Regulator (Energy Services Regulatory Authority (ERSE)) and 1 out of 2 PCTs studied is owned by a consumer organization (DECO)

 There is no certification body nor scheme in Portugal

1 out of 2
 PCTs clearly state on their websites to cover 100% of the energy market in Portugal in terms of energy suppliers and available offers, based on a sample of 2 PCTs

Market coverage

Out of 1 PCT owned by the national Regulator:

- 1 PCT does not clearly indicate its market coverage in terms of offers and suppliers

Out of 1 PCT owned by a consumer organization (DECO) studied:

- 1 PCT covers 100% of the energy market in terms of offers and suppliers

Business model

- 1 out of 2 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 2 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 2 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 1 out of 2 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 2 PCTs studied explain **how often data** presented on their websites **is being updated**
- 1 out of 2 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 1 out of 2 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Energy mix

The **first results page**** on the Regulator PCT website shows per offer:

- Supplier name
- Tariff name
- Annual rate
- Link to suppliers website and offer details
- Additional information



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions



Energy Bills

General overview



2 out of 2

Energy suppliers explain the content of their bills on their website



2 out of 2

Energy suppliers provide an explanation of the price breakdown on their websites



2 out of 2

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 2 example bills)

Legal requirements

The Code of Commercial Relations (RRC) in the Electricity Market, Art. 129 to 131 for electricity and Art. 115 for gas regulates the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Content of the bill
- Consumption data
- Information on fuel mix
- Billing frequency
- Payment method
- Price breakdown
- Information on complaint handling (conflict resolution)

Frequency of Consumption statement

The Code of Commercial Relations (RRC) in the Electricity Market, Art. 129 to 131 for electricity and Art. 115 for gas ensures that bills must be released **on a monthly basis**, but that the periodicity can also be changed upon agreement between the consumer and the supplier. The bill must contain details on energy consumption

The frequency can be agreed between the consumer and the energy supplier. According to the Regulator, the most common is **bi-monthly and annual** (for consumers who opt to receive one bill per year and pay a fix amount per month)

Once a year, consumers must receive a bill summarising energy consumption and breakdown of price



Content

The Portuguese Regulator ERSE complements the national legal framework by requiring **energy bills to mention the following elements**:

- Customer reference number
- Tariffs related to the network access
- Billing period
- Overall due amount
- Discounts (if applicable)
- Breakdown of consumption
- Price breakdown

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Frequency of billing
- Payment methods
- Media used

The **bills** analysed (sample of 2 example bills) usually provide information on the following elements :

- Customer reference number
- Billing date
- Period applied
- Total price (and price broken-down)
- Supplier's logo
- Consumption data
- Tariffs on the network access
- Information on switching
- Information about energy production

2 out of the 2 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 2 example bills)

Initiatives, non-binding measures and guidance documents

The Regulator reported in the Regulator survey to not have cooperated with organisations as to improve the bill design





EU and national Regulatory Framework

PORTUGUESE LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Decree Law N°29, of 15/02/2006

On the organization/operation of the National Electricity System

Decree-Law N°215-A, of 08/10/2012

Introduces new rules into the organizational framework of National electric power

Decree-Law N°178, of 27/08/2015

Establishes rules about tariffs

Decree-Law N°172, of 23/08/2006

Provides the legal regime for the production, transport, distribution and commercialization of electricity, and switching

Decree-Law N°215-B, of 08/10/2012

Amending the Decree law N°172 of 23/08/2006

Law N°7-A, of 30/03/2016

Amending the Decree law N°172 of 23/08/2006

Decree Law N°138-A, of 28/12/2010

Sets up the social tariffs for the supply of electricity to be applied on economically vulnerable users

Decree Law N°68-A, of 28/12/2010

Lays down provisions on energy efficiency and cogeneration production.

Decree Law N°23, of 20/01/2009

Ensuring the security of electricity supply and investment in infrastructures

Decree Law N°446/85, of 25/10/1985

Establishes the legal regime of clauses contractual arrangements

Decree Law N°57/2008, of 26/03/2008

Establishes the regime applicable to trade in consumer relations

Law of Defense of Consumers N°47/2014, of 28/07/2014

Establishes the legal regime applicable to consumer protection and amending law N°24/96

ALTERNATIVE DISPUTE RESOLUTION

Law N°144/2015 of 08/09/2015

Establishes the legal framework for out-of-court settlement mechanisms for consumer disputes and repeals

SOFT LAWS

Code of Commercial Relations (RRC)

Electricity (Article 105.º - pre-contractual information; Article 132.º - Bill)

Natural gas (Article 87.º - pre-contractual information; Article 115.º - Bill)

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law

Source: National Regulator ERSE Survey

Former Deloitte study on European energy regulations

National Regulator ERSE website

<http://www.erse.pt/eng/mktsupervision/fwrkcodes/Paginas/default.aspx>



NOTES | PORTUGAL

Main bodies and contact details

Energy Regulator	Entidade Reguladora dos Servicos Energeticos (ERSE) / Energy Services Regulatory Authority R. D. Cristovao da Gama, 1 3º, 1400-113, Lisboa Website: http://www.erse.pt	
Single Point of Contact	ERSE	
Price Comparison Tools	ERSE Website: http://www.erse.pt/pt/Paginas/home.aspx	Deco Proteste Website: https://www.deco.proteste.pt
	Selectra (not part of the sample) Website: https://comparador.selectra.pt/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Instituto do Consumidor / Consumer Institute Av. Praça Duque de Saldanha, nº31-1º, 2º, 3º e 5º, 1069-013 Lisboa, Portugal Website: http://www.consumidor.pt	Conselho Nacional Do Consumo (CNC) / National Consumer Council Praça Duque de Saldanha, n.º 31-3º, 1069-013 Lisboa Website: http://www.consumidor.pt
Body with responsibilities relating to competition	Autoridade da Concorrencia (AC) / Competition Authority R. Laura Alves, nº4-7º, 1050-138, Lisboa Website: http://www.autoridadeconcorrencia.pt	
Alternative Dispute Resolution Entity	ERSE	
Other relevant bodies and consumer organisations	Associação Portuguesa para a Defesa do Consumidor (DECO) / Portuguese Association for Consumer Protection R. Artilharia 1, 79-4º, 1269-160, Lisboa Website: http://www.deco.proteste.pt	Uniao General de Consumidores (UGC) / General Union of Consumers R. Damasceno Monteiro, 114-1º, 1170-113, Lisboa Website: http://ugc.pt/noticias/index.php/



COUNTRY FICHE

ROMANIA

Key take-aways

This section presents a general summary of the key observations for Romania on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Romanian and sometimes in English
- On average, 31 tariffs are offered on the energy suppliers' websites, based on a sample of 4 suppliers
- Out of these 31 tariffs, 24 household electricity offers, 7 household natural gas offers, 0 household mix electricity and gas offers, 0 '100% green offers' and 0 self-generation tariffs are offered
- 2 out of 4 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 4 suppliers
- The Emergency Ordinance no. 34/2014 on consumer rights, Art. 4 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

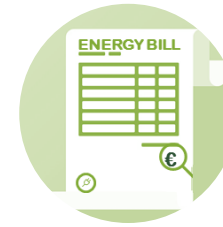
Switching fees & Contract termination fees

- Switching fees are free of charge as ensured by the Law 123/2012, last amended 2014, Art. 62 (1) h)
- There are no requirements included in the national legislation on contract termination fees



Price Comparison Tools

- There are 3 Price Comparison tools in Romania (sample of 1 PCT studied)
- 1 out of 1 PCT studied is privately owned
- There is no certification body nor scheme in Romania
- 0 out of 1 PCT clearly state on its website to cover 100% of the energy market in Romania in terms of energy suppliers and available offers, based on a sample of 1 PCT



Energy Bills

- The Law on Energy Efficiency Electricity and Natural Gas no. 123/2012, Art. 11 and Annex 5 regulates the energy bills for electricity and gas suppliers
- The Law no. 123/2012 on electricity and natural gas, with subsequent amendments and supplements - Art. 57 and 14(4) ANRE Orders no. 64/2014 - chapters 7 and 8, 88/2015 - annex on bill layout, 96/2015 and 29/2016 - section 4 18/04/2012 regulates billing frequency





Pre-contractual Information

General overview



The offers are presented in Romanian and sometimes in English



31

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 4 suppliers



2 out of 4

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 4 suppliers



0 out of 4

Suppliers apply switching fees, based on a sample of 4 suppliers

Legal requirements*

According to the Emergency Ordinance no. 34/2014 on consumer rights, Art. 4; before a contract, other than a distance contract or a contract outside the premises commercial or any similar offer to produce binding effects on the consumer, the professional must provide the consumer with the following information in a visible, legible and understandable manner:

- The main characteristics of the products or services
- The identity of the professional, the postal address, the telephone number, fax number and electronic postal address
- The total price of the products or services with all taxes included. If the price cannot be reasonably calculated in advance due to the nature of the goods or services, the fact that additional costs could be borne by the consumer should be mentioned

Offers and green energy offers studied

- The 4 energy suppliers offer a total of **24 household electricity offers, 7 household natural gas offers** and **0 household mix electricity and gas offers**
- 0 out of 4 energy suppliers offer **'100% green offers'**
- 0 out of 4 energy suppliers offer **self-generation offers**

Bundled offers

0 out of 4 energy suppliers offer **bundled services**

Source: National Regulator Energy Agency Survey

Sample Review performed by Deloitte on 4 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the Law on Energy Efficiency Electricity and Natural Gas no. 123/2012, Art. 11 and Annex 5:

- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching
- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 4 suppliers studied **apply switching fees**
- 4 out of 4 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Information on switching and contract termination is provided to customers on the Autoritatea Nationala de Reglementare in domeniul Energiei website

According to the Regulator survey, energy switching has been promoted by the National Regulator through awareness raising campaigns

According to the Regulator survey, energy suppliers must provide information to consumers in bills and other personalised information

According to the Regulator survey, energy suppliers must provide information to consumers via their website on energy switching according to the Regulator





Price Comparison Tools (PCTs)

General overview



3

There are 3 Price Comparison tools in Romania (sample of 1 PCT studied)



1 out of 1 PCT studied is privately owned



There is no certification body nor scheme in Romania

100%

0 out of 1 PCT clearly state on its website to cover 100% of the energy market in Romania in terms of energy suppliers and available offers, based on a sample of 1 PCT

Market coverage

Out of 1 privately owned PCT studied:

- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 0 out of 1 PCT studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 1 PCT studied displays information as regards the **source of data** presented on the website
- 1 out of 1 PCT studied offers consumers the possibility to **directly switch suppliers** from its website
- 1 out of 1 PCT studied presents information regarding **the switching procedures** of its website
- 0 out of 1 PCT studied explains **how often data** presented on its website **is being updated**
- 0 out of 1 PCT studied give consumers **the possibility to give their review of the PCT website**
- 0 out of 1 PCT studied provides an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers cannot be filtered other criteria*

At a minimum

- Payment deadline
- Whether the switching can be done online
- Duration of the contract

The **first results pages**** on the PCTs' website show per offer:

- Supplier name
- Offer validity period
- Price breakdown
- Link to the suppliers' website

Non-price elements

The user cannot compare any **non-price elements of the offer** on the PCTs websites





Energy Bills

General overview



1 out of 4

Energy suppliers explain the content of their bills on their website



1 out of 4

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 1

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 1 example bills)

Legal requirements

The Law on Energy Efficiency Electricity and Natural Gas no. 123/2012, Art. 11 and Annex 5 regulates the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Comparisons between the final consumption of energy of the final consumer and consumption corresponding to the same period of the previous year, preferably in the form of graphics
- Contact information for end-user organizations, energy agencies, or similar bodies, including website addresses where e.g. information on available energy efficiency measures can be obtained
- Supplier details
- Actual prices
- Actual energy consumption

Frequency of consumption statement

The Law no. 123/2012 on electricity and natural gas, with subsequent amendments and supplements - Art. 57 and 14(4) ANRE Orders no. 64/2014 - chapters 7 and 8, 88/2015 - annex on bill layout, 96/2015 and 29/2016 - section 4, ensures the consumers receive at least one annual statement presenting their consumption

It also mentions that the same information must be available **at least quarterly** in case of electronic invoices and otherwise, twice a year

The legislation mentions that the billing period is usually **monthly or different depending on the contractually** agreed terms, but cannot exceed 3 months



Content

The Romanian Regulator, through the Order no. 88/2015 complements the national legal framework by requiring **energy bills to mention the following elements:**

- Detailed supplier information (including bank details)
- Detailed customer information
- Consumption details (period of consumption)
- Prices and price breakdown
- VAT
- Fees and charges
- Information on switching

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspect of their energy bills:**

- Payment methods

The **bills** analysed (sample of 1 example bills) usually provide information on the following elements :

- Supplier's logo
- Details of the supplier
- Details of the contract
- Summary of the bill
- Customer data
- Actual consumption of energy
- Dates of the meter readings
- Type of meter
- Total price
- Price breakdown
- Current price of energy

0 out of the 1 energy supplier providing example bills displays information on the **elements required for switching on its bills** (sample of 1 example bills)





EU and national Regulatory Framework

ROMANIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Law on Electricity and Natural Gas no. 123/2012 as last amended by Law no. 127/2014 of 30/12/2014

On the Regulatory framework for the development of activities in the electricity and thermal energy sectors produced in cogeneration in order to optimize the use of primary energy resources under conditions of accessibility, availability and supportability and in compliance with safety, protection of the environment

Law on Energy Efficiency no. 121/2014 of 04/08/2014

On the legal framework for the development and implementation of the national energy efficiency policy in order to achieve the national energy efficiency target

Emergency Ordinance no. 35/2013 of 30/04/2013 amending and supplementing the Government

Emergency Ordinance no. 34/2006 of 15/05/2006

On the award of public procurement contracts, public works concession contracts and service concession contracts

Law no. 363/2007 on combating the incorrect practices of traders in relation to consumers and harmonizing the regulations with the European legislation on consumer protection, of 21/12/2007

Order 150/2015 of 15/12/2015 by the ANRE

On the approval of specific tariffs for the power distribution service and the price for reactive electric power

Order 85/2014 of 10/09/2014 by the ANRE

For the approval of the Regulation on the organization and functioning of the dispute settlement / divergence committees on access to energy networks / systems

Order 61/2013 of 29/08/2013 by the ANRE

On the organization and functioning of the Commission for the settlement of disputes on the wholesale and retail market in the electricity and natural gas market

Emergency Ordinance no. 34/2014, of 04/06/2014

On consumer rights in contracts concluded with professionals, as well as amending and supplementing normative acts

Ordinance no. 21/1992 on consumer protection, of 28/08/1992

ALTERNATIVE DISPUTE RESOLUTION

Law no. 127/2014 amending and completing the Law on Electricity and Natural Gas no. 123/2012

Concerning alternative dispute resolution for consumer disputes

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | ROMANIA

Main bodies and contact details

Energy Regulator	Autoritatea Nationala de Reglementare in domeniul Energiei (ANRE) Str. Constantin Nacu nr. 3, Bucuresti, Sector 2, Cod postal 020995 Website: http://www.anre.ro
Single Point of Contact	Autoritatea Nationala de Reglementare in domeniul Energiei (ANRE)
Price Comparison Tool	Ebuget.ro Website: http://www.ebuget.ro/oferte-energie-electrica
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Autoritatea națională pentru protecția consumatorilor (ANPC) / National Authority for the Protection of Consumers București, Bulevardul Aviatorilor nr. 72, sector 1 Website: http://www.anpc.gov.ro/
Body with responsibilities relating to competition	Consiliul Concurenței/Competition Council Piața Presei Libere, nr. 1, corp D1, Sector 1, Cod Poștal 013701, București Website: http://www.consiliulconcurentei.ro/
Alternative Dispute Resolution Entity	ANRE
Other relevant bodies and consumer organisations	Association for Consumers Protection (APC) Nicolae Balcescu 32-34, 4th floor, ap. 16 Bucharest, RO-010055 Website: http://www.apc-romania.ro



COUNTRY FICHE

SLOVAKIA

Key take-aways

This section presents a general summary of the key observations for Slovakia on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Slovak and sometimes in English
On average, 74 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 74 tariffs, 34 household electricity offers, 40 household natural gas offers, 0 household mix electricity and gas offers, 0 '100% green offers' and 0 self-generation tariffs are offered
- 2 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Energy Act No. 251/2012 Coll. (Section 17) regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

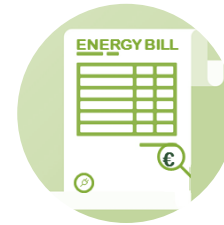
Switching fees & Contract termination fees

- Switching is free of charge as ensured by the Act 251/2012, section 35 and section 64
- There are no requirements included in the national legislation on contract termination fees



Price Comparison Tools

- There are 3 Price Comparison tools in Slovakia in total (sample of 3 PCTs studied)
- 3 out of 3 PCTs are privately owned
- There is no accreditation body nor scheme in Slovakia
- 0 out of 3 PCTs clearly state on their websites to cover 100% of the energy market in Slovakia in terms of energy suppliers and available offers, based on a sample of 3 PCTs



Energy Bills

- The Act No. 251/2012 Coll. regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment
- The regulation does not specify at which frequency the consumers should receive statements presenting their consumption





Pre-contractual Information

General overview



The offers are presented in Slovak and sometimes in English



74

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



2 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Energy Act No. 251/2012 Coll. (Section 17), the provision of information about the content of the contract on combined supply of electricity or the contract on combined supply of gas as per subsection 1, item a) states the information shall be provided to the consumer 'reasonably in advance before concluding of such contract'. A reasonable period in advance is understood as the time that the household consumer of electricity or household consumer of gas requires to evaluate the information about the content of the contract on combined supply of electricity or contract on combined supply of gas

To conclude a contract for combined electricity supply or contract for combined gas supply with an electricity supplier or gas supplier, the contract shall include, in particular:

- Identification of the supplier
- The conditions for the supply of electricity or the supply of gas and the supply of related services
- The duration of the contract
- The conditions under which the contract may be terminated, including information about fees for termination of the contract or information that the contract may be terminated without a fee
- The place, method and deadlines for filing complaints and for settling disputes

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **34 household electricity offers, 40 household natural gas offers and 0 household mix electricity and gas offers**
- 0 out of 6 energy suppliers offer '**100% green offers**'
- 0 out of 6 energy suppliers offer **self-generation offers**

Bundled offers

1 out of 6 energy supplier offers **1 bundled service in total**

Sample Review performed by Deloitte on 6 energy suppliers

**Covers only an extract of the national legal requirements. Details can be found in the draft final report*



Switching fees and contract termination fees

According to the Act 251/2012, section 35 and section 64:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 6 out of 6 suppliers studied **provide information regarding switching on their website**





Price Comparison Tools (PCTs)

General overview



3

There are 3 Price Comparison tools in Slovakia (sample of 3 PCTs studied)



3 out of 3 PCTs are privately owned



There is no accreditation body nor scheme in Slovakia



0 out of 3

0 out of 3 PCTs clearly state on their websites to cover 100% of the energy market in Slovakia in terms of energy suppliers and available offers, based on a sample of 3 PCTs

Market coverage

Out of 3 privately owned PCTs studied:

- 3 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 0 out of 3 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 3 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 3 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 0 out of 3 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 3 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 3 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 3 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT bases its quality assessment on internal assessment tools (e.g. KPIs, traffic or page views by users, etc.)

Information presentation

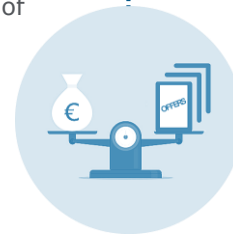
Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Length of the contract

The **first results pages**** on the PCT websites show per offer at a minimum:

- | | |
|---------------------|---------------|
| • Supplier | • Tariff name |
| • Contract duration | • Link |



Non-price elements

The user cannot compare **non-price elements offers** on the PCT websites

*Based on a sample of 3 PCTs

**In addition, some websites include other criteria and details



Energy Bills

General overview



4 out of 6

Energy suppliers explain the content of their bills on their website



4 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 4

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements

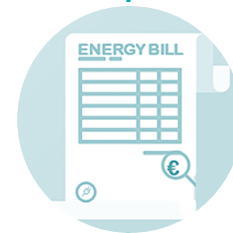
The Act No. 251/2012 Coll. regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an electricity bill that contains the following minimum requirements:

- Unit price for the purchase of electricity or gas. The price shall include the sales activity of the supplier of electricity or supplier of gas, the transmission of gas, the distribution of electricity including transmission or distribution of gas, the storage of gas, losses upon the transmission of electricity and distribution of electricity, system services in the power sector and the operation of the system in the power sector
- The customer should be able to choose an indiscriminate form and method of payment
- When determining the level of advance payments, the electricity supplier or gas supplier will take into account the level of the advance payments for the same period of the preceding billing period

Frequency of consumption statement

The regulation does not specify at which frequency the consumers should receive statements presenting their consumption



Content

The **bills** analysed (sample of 4 example bills) provide usually information on the following elements:

- Logo of the supplier
- Details of the supplier
- Summary of the bill
- Energy source
- Dates of the meter reading
- Price breakdown
- Claims and customer service contact details

0 out of the 4 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 4 example bills)





EU and national Regulatory Framework

SLOVAK LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Act No. 69/2013 Coll.

On energy efficiency of the buildings

Act No. 30/2013 Coll.

On promotion of renewable energy sources and high efficiency combined generation

Act No. 250/2012 Coll.

On regulation in network industries

Act No. 251/2012 Coll.

On energy and on the amendment of certain laws

Act No. 197/2012 Z.z. 19 June 2012

Commercial Code

Act No. 189/2012 Z.z. of 20 June 2012

On the excise duty on electricity, coal and natural gas and on amending and on the Excise Duty on Mineral Oil

Act No. 184/2011 Z.z. of 1 June 2011

On thermal energy as amended

Act No. 136/2011 Z.z.

On the Promotion of Renewable Energy Sources and Highly Efficient Cogeneration and on Amendments to Certain Acts as amended and amending

Act No. 117/2011 Z.z. of 29 March 2011

On the administration of price proposals of commercial companies

Act No. 309/2009 Coll.

On regulation in network industries and on amendments and supplements to certain laws as amended

ALTERNATIVE DISPUTE RESOLUTION

Zákon č. 40/1964 Zb. Občiansky zákonník

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

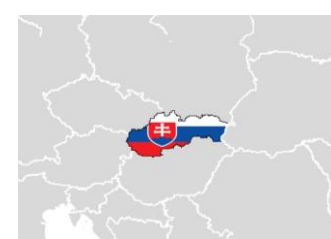
Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | SLOVAKIA

Main bodies and contact details

Energy Regulator	Regulatory office for Network Industries (URSO) Bajkalska 27, 820 07 Bratislava Website: http://www.urso.gov.sk	
Single Point of Contact	Regulatory office for Network Industries (URSO)	
Price Comparison Tools	VyhodnaEnergia.SK Website: http://www.vyhodnaenergia.sk	Platmenej Website: http://www.menej.sk
	TotalMoney Website: http://totalmoney.sk/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Slovak Trade Inspection (STI) Prievozska 32, 827 99 Bratislava 27 Website: http://www.soi.sk	
Body with responsibilities relating to competition	Antimonopoly Office of the Slovak Republic Drienova 24 – 826 03 Bratislava Website: http://www.antimon.gov.sk	
Alternative Dispute Resolution Entity	Slovak Chamber of Commerce and Industry Gorkého 9, 816 03 Bratislava Website: http://www.web.scci.sk	
Other relevant bodies and consumer organisations	Slovak Consumers' Association SCA Palisadi 22 – SK-81106 Bratislava Website: http://www.zss.sk	



COUNTRY FICHE

SLOVENIA



Key take-aways

This section presents a general summary of the key observations for Slovenia on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented most of the time in Slovenian and sometimes in English. On average, 55 tariffs are offered on the energy suppliers' websites on average, based on a sample of 6 suppliers
- Out of these 55 tariffs, 30 household electricity offers, 9 household natural gas offers, 5 household mix electricity and gas offers, 8 '100% green offers' and 3 self-generation tariffs are offered
- 4 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Energy Act 1997:857 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

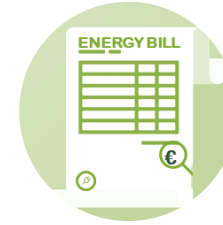
Switching fees & Contract termination fees

- Switching and contract termination are free of charge as ensured by the Energy Act, 22/03/2014, Art. 40 and 48
- However, the consumer shall bear the consequences from an early withdrawal from the supply contract (if withdrawal occurs less than one year after the contract is concluded)
- Information on switching and contract termination is provided to customers on the Regulator's (the Energy Agency of the Republic of Slovenia) website
- The Regulator reported in the Regulator survey to have conducted a collective switching campaign



Price Comparison Tools

- There are 3 Price Comparison tools in Slovenia (sample of 2 PCTs studied)
- 1 out of 2 PCTs studied is owned by the Slovenian Regulator (Energy Agency) and 1 out of 2 PCTs studied is privately owned
- There is no certification body nor scheme in Slovenia
- 1 out of 2 PCTs clearly state on their websites to cover 100% of the energy market in Slovenia in terms of energy suppliers and available offers, based on a sample of 2 PCTs



Energy Bills

- The Energy Act (Articles 42, 48, 162, 172) and the Consumer Protection Act (Articles 25b, 43b) regulates the energy bills for electricity and gas suppliers
- The energy Act (Articles 42, 48, 162, 172) and the Consumer Protection Act (Articles 25b, 43b) regulates billing frequency





Pre-contractual Information

General overview



The offers are usually presented in Slovenian and sometimes in English



55

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



4 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the Energy Act 1997:857, the general contractual conditions in the supply contract between the household customer and the supplier must be concluded in writing or in electronic form in accordance with the rules on electronic commerce. They must be fair and known in advance and the supplier must provide them to the household customer before the contract is concluded, even if the contracts are concluded by intermediaries

The contract shall specify at least the following:

- The name and address of the supplier
- The price
- The terms of payment
- The rights and obligations of the parties of the contract in respect of failure to comply with the contract
- The type of service provided by the supplier and the offered level of service quality
- The ways to obtain information on all applicable tariffs and maintenance costs

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **30 household electricity offers, 9 household natural gas offers** and **5 household mix electricity and gas offers**
- 2 out of 6 energy suppliers offer **8 '100% green offers' in total** (1 energy supplier offers 1 green offer and 1 energy supplier offers 7 green offers)
- 3 out of 6 energy suppliers offer **3 self-generation offers in total** (3 energy suppliers offer 1 self generation offer each)

Bundled offers

3 out of 6 energy suppliers studied offer **3 bundled services in total** (3 energy suppliers offer 1 bundled service each)

Source: National Regulator Energy Agency Survey, The Energy Act

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report

Switching fees and contract termination fees

According to the Energy Act, 22/03/2014, Art. 40 and 48:

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge
- Contract termination is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the contract termination

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 5 out of 6 suppliers studied **provide information regarding switching on their website**



Initiatives, non-binding measures and guidance documents

The Regulator reported in the Regulator survey to have conducted a collective switching campaign





Price Comparison Tools (PCTs)

General overview



3

There are 3 Price Comparison tools in Slovenia (sample of 2 PCTs studied)



1 out of 2 PCTs studied is owned by the Slovenian Regulator (Energy Agency) and 1 out of 2 PCTs studied is privately owned



There is no certification body nor scheme in Slovenia



1 out of 2

PCTs clearly state on their websites to cover 100% of the energy market in Slovenia in terms of energy suppliers and available offers, based on a sample of 2 PCTs

Market coverage

Out of 1 PCT owned by the national Regulator:

- The 1 PCT does not clearly indicate its market coverage in terms of suppliers

Out of 1 privately owned PCT studied:

- 1 PCT covers all the suppliers and offers in the energy market

Business model

- 1 out of 2 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 2 out of 2 PCTs studied display information as regards the **source of data** presented on their websites
- 2 out of 2 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 1 out of 2 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 2 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 2 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 2 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers cannot be filtered by other criteria

The **first results pages**** on the PCT websites show per offer at a minimum:

- Supplier
- Energy source
- Link to the suppliers' website
- Product or service name
- Price
- Contract duration

Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Energy source





Energy Bills

General overview



4 out of 6

Energy suppliers explain the content of their bills on their website



4 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



2 out of 4

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements

The Energy Act (Articles 42, 48, 162, 172) and the Consumer Protection Act (Articles 25b, 43b) regulates the energy bills for electricity and gas suppliers. According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Information on the previous year's consumption
- Information on dispute resolution procedures
- Information or links to websites providing information on the energy's environmental impact
- Comparison of consumption with the same user category (if possible)
- Energy mix

Frequency of consumption statement

Energy Act (Articles 42, 48, 162, 172) and Consumer Protection Act (Articles 25b, 43b) ensures that the consumers receive a statement **once a month** presenting their consumption

On demand, customers can receive information regarding their bills (Art. 355 of the Energy Act)

Content

The Slovenian Regulator complements the national legal framework by requiring **energy bills to mention the following elements**:

- Energy source
- Electricity price and consumption
- Environmental impact (CO2 emissions and radioactive wastes from electricity production)

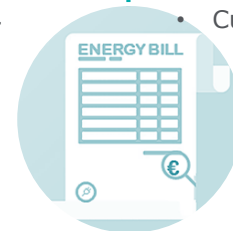
According to the regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Payment methods
- Media used

The **bills** analysed (sample of 4 example bills) usually provide information on the following elements:

- Supplier's logo
- Period and date
- Information on consumption
- Summary of the bill
- Customer data and bank details
- Contract number
- Fees, VAT
- Prices and price breakdown
- Products and tariffs
- Source of electricity

2 out of the 4 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 4 example bills)



Initiatives, non-binding measures and guidance documents

The Regulator reported in the Regulator survey to have undertaken studies as regards to bill design to improve the consumer situation





EU and national Regulatory Framework

SLOVENIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Act 39/15 and 36/16 of 23/12/2016

On the identification of the entity in an electronic data exchange between market participants in electricity and natural gas

Act 66/15, 105/15 and 61/16 of 23/12/2016

On the methodology for determining regulatory framework and methodology for calculating the network charge for electricity suppliers

Act 97/14 of 03/03/2016

On the methodology for the preparation and assessment of the investment plan of the system operator of electricity transmission

The Energy Act 17/14 and 81/15 as last amended by Law of 15/09/2015

On the principles of energy policy, the rules of operation of the energy market, and forms of public utilities in the energy sector, principles and measures for energy security, increasing energy efficiency, savings and use of renewable sources, and regulates the energy Agency

Act 81/12, 47/13, 112/13 7/14, 17/14 and 66/15 as last amended by Law of 15/09/2015

On the methodology for setting the network charge and criteria for determining eligible costs for electricity networks and the methodology for calculating network charges

Act 61/12, 64/12, 66/13, 17/14 and 28/15 of 15/09/2015

On the methodology for calculating network charges for the gas distribution network

Decree 46/15 of 31/03/2015

On the method of determining and calculating the contributions for the provision of support for the production of electricity from high efficiency cogeneration and renewable energy sources

Law on Value Added Tax 13/11 of 28/02/2011

APPLICABLE NATIONAL REGULATIONS

Ordinance 21/15 of 13/07/2015

On the average sales value of 1 kWh of electrical energy as the basis of the concession fee for the use of water to generate electricity in hydroelectric power plants up to 10MW of nominal power for 2015

System operating instructions for the electricity distribution network (41/11 and 17/14) of 22/03/2014

Consumer Protection Act last amended the 20/03/2015

On the rights of consumers in offering, selling and other forms of marketing of goods and services by businesses and sets out the obligations of state authorities and other entities that guarantee these rights

ALTERNATIVE DISPUTE RESOLUTION

Law on alternative dispute litigation 97/09 and 40/12 of 30/05/2012

Introducing alternative dispute resolution into the Consumer Code (published in the official gazette (Mémorial A) on 14 April 2016)

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | SLOVENIA

Main bodies and contact details

Energy Regulator	Energy Agency of the Republic of Slovenia Strossmayerjeva ulica 30, 2000 Maribor Website: http://www.agen-rs.si/en/	
Single Point of Contact	Not found at the time of the study	
Price Comparison Tools	Energy Agency of the Republic of Slovenia Website: http://primerjalnik.agen-rs.si	Varcuje 24 Website: http://varcuje24.si/elektrika
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Market Inspectorate Parmova 33 - 1000 Ljubljana Website: http://www.ti.gov.si/en/	
Body with responsibilities relating to competition	Slovenian Competition Protection Agency Dunajska 58 - SI-1000 Ljubljana Website: http://www.varstvo-konkurence.si/en/	
Alternative Dispute Resolution Entity	European Centre for Dispute Resolution (ECDR) Website: http://www.ecdr.si/eng/home.html	
Other relevant bodies and consumer organisations	Slovene Consumers' Association (SCA) Frankopanska 5, SI-1000 Ljubljana Website: http://www.zps.si/	



COUNTRY FICHE

SPAIN



Key take-aways

This section presents a general summary of the key observations for Spain on the topics highlighted below



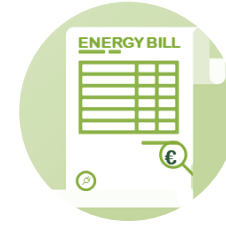
Pre-contractual Information Offers

- The offers are presented most of the time in Spanish and Catalan and sometimes in English
- On average, 48 tariffs are offered on the energy suppliers' websites, based on a sample of 3 suppliers
- Out of these 48 tariffs, 23 household electricity offers, 10 household natural gas offers, 9 household mix electricity and gas offers, 5 '100% green offers' and 1 self-generation tariffs are offered
- 1 out of 3 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 3 suppliers
- The Law 24/2013, Art. 44 (d) regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers



Price Comparison Tools

- There are 16 Price Comparison tools in Spain in total (sample of 4 PCTs studied)
- 1 out of 4 PCTs studied is owned by the Regulator (Comision Nacional de los Mercados y la Competencia) and 3 out of 4 PCTs studied are privately owned
- There is no certification body nor scheme in Spain
- 0 out of 4 PCTs clearly state on their websites to cover 100% of the energy market in Spain in terms of energy suppliers and available offers, based on a sample of 4 PCTs



Energy Bills

- The Regulation of 23/5/2013 and the resolution N.5655 of 23 May 2014 of the Ministry for the Industry, Energy and Tourism regulate the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment
- The regulation does not specify at which frequency the consumers should receive statements presenting their consumption





Pre-contractual Information

General overview



The offers are usually presented in Spanish and Catalan and sometimes in English



48

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 3 suppliers



2 out of 3

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 3 suppliers



0 out of 3

Suppliers apply switching fees, based on a sample of 3 suppliers

Legal requirements

According to the Law 24/2013, Art. 44 (d), the general conditions shall be fair and transparent and shall comply with the provisions of current regulations regarding contracts with consumers. They should be explained in a clear and understandable language and will not include non-contractual obstacles to the exercise of client rights. Customers will be protected against abusive or misleading sales methods. The general conditions should be announced in advance, before the confirmation of the contract. When the contracts are concluded through intermediaries, the aforementioned information should also be communicated before the conclusion of the contract

The formalisation of a contract with the network provider or energy provider shall include:

- Supplier details
- Terms and conditions of the contract
- Conditions for renewal and causes for termination, as well as conflict resolution procedures
- Conditions to review the contract's clauses
- Tariffs, full disclosure of promotional discounts
- Description of the services provided (including maintenance) and quality of service

Offers and green energy offers studied

- The 3 energy suppliers offer a total of **23 household electricity offers, 10 household natural gas offers, 9 household mix electricity and gas offers** in the country
- 3 out of 3 energy suppliers offer **5 '100% green offers' in total** (2 energy supplier offer 1 green offer each and 1 energy supplier offers 3 green offers)
- 1 out of 3 energy suppliers offer **1 self-generation offer in total**

Bundled offers

4 out of 6 energy suppliers offer **7 bundled services in total** (1 supplier offers 1 bundled service and 3 suppliers offer 2 bundled services each)

Sample Review performed by Deloitte on 3 energy suppliers



Switching fees and contract termination fees

According to the Law 24/2013, Art. 44.1(k) and the RDL 1/2007 covering consumer protection, Art. 62 and 71 (Contracts):

- Switching is free of charge
- The consumer and user may exercise their right to terminate the contract without any sanction or disproportionate charges

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching
- Timeframe within which the supplier must apply the contract termination

Practices in the energy market in relation to switching

- 0 out of 3 suppliers studied **apply switching fees**
- 2 out of 3 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

A consumer organisation (OCU) conducted a collective switching campaign*



*BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Price Comparison Tools (PCTs)

General overview



16

There are 16 Price Comparison tools in Spain (sample of 4 PCTs studied)



1 out of 4 PCTs studied is owned by the Regulator (Comision Nacional de los Mercados y la Competencia) and 3 out of 4 PCTs studied are privately owned



There is no certification body nor scheme in Spain



0 out of 4

PCTs clearly state on their websites to cover 100% of the energy market in Spain in terms of energy suppliers and available offers, based on a sample of 4 PCTs

Market coverage

Out of 1 PCT owned by the National Regulator:

- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Out of 3 privately owned PCTs studied:

- 3 PCTs do not clearly indicate their market coverage in terms of suppliers and offers

Business model

- 2 out of 4 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 4 PCTs studied display information as regards the **source of data** presented on their websites
- 3 out of 4 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 2 out of 4 PCTs studied present information regarding **the switching procedures** of their websites
- 1 out of 4 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 4 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 4 PCTs studied provide an **effective procedure to report incorrect information on published offers**
- The PCT survey showed that 1 PCT bases its quality assessment on internal assessment tools (e.g. KPIs, traffic or page views by users, etc.)

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Ordered by price

In addition**

- Quality of supplier
- With/out additional services

The **first results pages**** on the PCT websites show per offer at a minimum:

- Price per year
- Contract duration
- Suppliers' details
- Tariffs names
- Renewable energy providers
- Price breakdown
- Additional services provided



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Contract conditions



Energy Bills

General overview



3 out of 6

Energy suppliers explain the content of their bills on their website



3 out of 3

Energy suppliers provide an explanation of the price breakdown on their websites



3 out of 3

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 3 example bills)

Legal requirements

The Regulation of 23/5/2013 regulates the energy bills for electricity and gas suppliers, the payment methods, as well as the conditions of reimbursement of overpayment

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Price breakdown (e.g. breakdown charges in consumer bills according to energy costs, network charges and taxes/levies)
- Information on complaint handling
- Information on the previous year's consumption

The resolution n. 5655 of 23/05/2014 provides a bill template* and lists the details of the information to be provided by the suppliers:

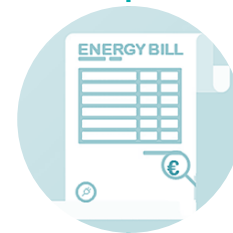
- Logo and details of the supplier
- Total amount, consumption period and invoice number
- History of consumption of the last 14 months
- Information on electricity consumption
- Incentives for renewable energies
- Contract termination date
- Customers rights and resolution of disputes
- Prices for the consumed energy

Content

The **bills** analysed (sample of 3 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Summary of the bill
- Switching code
- Customer data
- Information on the electricity consumption
- Details of the contract
- Dates of the meter readings

3 out of the 3 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 3 example bills)



Frequency of consumption statement

The regulation does not specify at which frequency the consumers should receive statements presenting their consumption

Sample Review performed by Deloitte on 3 energy suppliers

*Bill template: http://www.boe.es/diario_boe/txt.php?id=BOE-A-2014-5655



EU and national Regulatory Framework

SPANISH LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

Regulation of 18/04/2012

Ministerial order about energy billing

Regulation of 31/08/2010

Concerning the setting of the transitional market-adjusted regulated tariff level

APPLICABLE NATIONAL LAWS

Ley 24/2013, de 26 de diciembre, del Sector Eléctrico

On the organization of the electricity market

Electricity Act 24/2013

On tariffs' sufficiency, for small consumers, deficits and temporary shutdowns of electricity generation facilities

Royal Legislative Decree (RLD) 13/2012

Transposes Directive 2009/72/EC into national law

Ley 34/1998, de 7 de octubre, del sector de hidrocarburos

On the organization of the hydrocarbons market

ALTERNATIVE DISPUTE RESOLUTION

Law 3/2014, of 27 March, approving the revised text of the General Law for the Defense of Consumers and Users and other complementary laws, approved by Royal Decree 1/2007 of 16 November

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC

SOFT LAW

Proposed Draft Law on Alternative Recourse to Consumption Disputes 17/04/2014

Concerning the simplification of the civil procedure in electronic communication and the alternative dispute resolution

Resolution No 5655 of 23/05/2014, Bill template

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94-136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | SPAIN

Main bodies and contact details

Energy Regulator	Comision Nacional de los Mercados y la Competencia (CNMC) C/ Alcalá, 47 – 28014 Madrid Website: http://www.cnmc.es/	
Price Comparison Tools	OCU Website: http://www.ocu.org/	Rastreador Website : http://www.rastreador.com/
	Compara tarifas energia Website: http://www.comparatarifasenergia.es/	Comision Nacional de los Mercados y la Competencia (CNMC) Website : https://www.cnmc.es/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Agencia Espanola de Consumo, Seguridad Alimentaria y Nutricion (AECOSAN) Calle de Alcalá, 56, 28014 Madrid Website: http://consume-inc.es	
Body with responsibilities relating to competition	Comision Nacional de la Competencia (CNMC) Carrer de Bolívia, 56, 08018 Barcelona Website: http://www.cnmc.es/	
Alternative Dispute Resolution Entity	AECOSAN Website: http://www.aecosan.msssi.gob.es/AECOSAN/web/home/aecosan_inicio.htm	
Other relevant bodies and consumer organisations	Conferacion de Consumidores y Usuarios – CECU Mayor, 45 – 2º, 28013 Madrid Website: http://www.cecuc.es	



COUNTRY FICHE

SWEDEN



Key take-aways

This section presents a general summary of the key observations for Sweden on the topics highlighted below



Pre-contractual Information

Offers

- The prices are presented most of the time in Swedish and sometimes in English
- On average, 83 electricity prices (hereafter 'prices') are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 83 prices, 39 household prices, 11 household natural gas prices, 0 household mix electricity and gas prices, 32 '100% green prices' and 1 self-generation price are offered
- 4 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Electricity Act and the Third Internal Market Package for Electricity and Natural Gas (Sections 13 and 18) regulates the minimum requirements regarding the content of prices and the provision of pre-contractual information presented to consumers

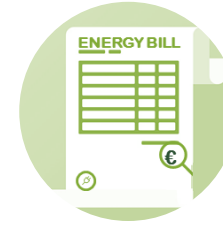
Switching fees & Contract termination fees

- Switching and contract termination are free of charge as ensured by the Electricity act (1997:857), Chap. 11 §16 and 19 and Distance agreement and agreement outside of business premises §10 and §12



Price Comparison Tools

- There are 5 Price Comparison tools in Sweden in total (sample of 4 PCTs studied)
- 1 out of 4 PCTs studied is owned by the Regulator Swedish Energy Markets Inspectorate and 3 out of 4 PCTs studied are privately owned
- There is no certification body nor scheme in Sweden
- 0 out of 4 PCTs clearly state on their websites to cover 100% of the energy market in Sweden in terms of energy suppliers and available prices, based on a sample of 4 PCTs



Energy Bills

- The Electricity Act (1997:857) Chapter 3 Section 10 a, Section 23 Chapter 8, Section 12, Chapter 8 Section 14-18, Chapter 11 Section 13, Chapter 11 Section 17-18 and the General requirements which applies to all types of invoicing can be found in Swedish Companies Act, Bookkeeping Act and VAT Act regulate the energy bills for electricity and gas suppliers
- The Electricity Act, Ch. 8, Section 18 regulates billing frequency





Pre-contractual Information

General overview



The prices are usually presented in Swedish and sometimes in English



83

Prices are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



4 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements

According to the Electricity Act and the Third Internal Market Package for Electricity and Natural Gas (Sections 13 and 18), electricity suppliers and network concessionaires who enter into agreements with consumers shall provide clear information on their websites, covering:

- Consumer rights
- Procedures for submission of consumer complaints
- Responsible bodies for dispute settlement
- Independent User Advice, where consumers can get advice on available energy efficiency and comparative profiles

Information on the terms and conditions shall be given to the consumer before the agreement is concluded or confirmed

Prices and green energy prices studied

- The 6 energy suppliers offer a total of **39 household electricity prices, 11 household natural gas prices** and **0 household mix electricity and gas prices**
- 5 out of 6 energy suppliers offer **32 '100% green offers/prices' in total** (1 energy supplier offers 1 green price, 2 energy suppliers offer 3 green prices each, 1 energy supplier offers 6 green prices and 1 energy supplier offers 19 green prices)
- 1 out of 6 energy supplier offers **1 self-generation price in total**

Bundled prices

0 out of 6 energy suppliers offer **bundled services/prices**



Switching fees and contract termination fees

According to the Electricity act (1997:857), Chap. 11 §16 and 19 and the Distance agreement and agreement outside of business premises §10 and §12:

- Switching is free of charge
- Contract termination is free of charge

There are **no requirements included in the national legislation** on:

- Timeframe within which the supplier must apply the switching
- Timeframe within which the supplier must apply the contract termination

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 6 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Regulator reported in the Regulator survey that:

- Information on switching and contract termination is provided to customers on the Swedish Energy Markets Inspectorate website
- Energy switching has been promoted by the Regulator through awareness raising campaigns
- Energy suppliers must provide information to consumers in bills and other personalised information
- Energy suppliers must provide information to consumers via their website on energy switching



Source: National Regulator SEMI Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Price Comparison Tools (PCTs)

General overview



5

There are 5 Price Comparison tools in Sweden in total (sample of 4 PCTs studied)



1 out of 4 PCTs studied is owned by the Regulator Swedish Energy Markets Inspectorate and 3 out of 4 PCTs studied are privately owned



There is no certification body nor scheme in Sweden



0 out of 4

0 out of 4 PCTs clearly state on their websites to cover 100% of the energy market in Sweden in terms of energy suppliers and available prices, based on a sample of 4 PCTs

Market coverage

Out of 1 PCT owned by national Regulator:

- The PCT does not clearly indicate its market coverage in terms of suppliers and prices

Out of 3 privately owned PCTs studied:

- 3 PCTs do not clearly indicate their market coverage in terms of suppliers and prices

Business model

- 4 out of 4 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 1 out of 4 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 4 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 1 out of 4 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 4 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 4 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 4 PCTs studied provide an **effective procedure to report incorrect information on published prices**

Information presentation

Prices are **ranked** from the cheapest one to the most expensive one. Prices can be filtered by the criteria*:

At a minimum

- Ordered by price

In addition**

- Customer satisfaction
- Discounts

The **first results pages**** on the PCTs websites studied shows per price:

- Annual rate
- Supplier name
- Product name
- Link to details of the price
- Contract duration
- Average rates per kWh

Non-price elements

The user can compare the following **non-price elements of the price** on the PCT websites:

At a minimum

- Discounts
- Contract duration
- Type of energy

In addition**

- Customer satisfaction





Energy Bills

General overview



4 out of 6

Energy suppliers explain the content of their bills on their website



4 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 4

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements

The Electricity Act (1997:857) Chapter 3 Section 10 a, Section 23 Chapter 8, Section 12, Chapter 8 Section 14-18, Chapter 11 Section 13, Chapter 11 Section 17-18 and the General requirements which applies to all types of invoicing can be found in Swedish Companies Act, Bookkeeping Act and VAT Act, regulate the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Information on the previous year's consumption
- Information or links to websites providing information on the energy's environmental impact
- Content of the bill
- Consumption data
- Frequency of billing
- Payment methods
- Price format
- Price breakdown
- Information on switching
- Information on complaint handling
- Information on the fuel mix and energy sources

Frequency of consumption statement

The Electricity Act, Ch. 8, Section 18 ensures that the consumers receive an energy bill **at least quarterly**, presenting their consumption and cost

According to the Regulator, consumers receive **a monthly energy bill**, including the meter reading at each monthly change, the annual consumption and the consumption statistics for the past 13 months

On demand, consumers can change the frequency of their bills



Content

According to the Swedish Energy Markets Inspectorate, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Content of the bill
- Frequency of billing
- Payment methods
- Media used

The **bills** analysed (sample of 4 example bills) usually provide information on the following elements:

- Invoice dates and address
- Customer reference number
- Period
- Prices and price breakdown
- Consumption and consumption breakdown
- Supplier's logo
- Information on energy sources
- Customer service and point of contact
- Account numbers (customer and provider)
- Supplier details
- Fees and prices
- Estimated annual consumption
- Measuring number and position

0 out of the 4 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 4 example bills)

Initiatives, non-binding measures and guidance documents

The Regulator reported in the Regulator survey that they cooperate with relevant stakeholders for consulting discussions when changes are made in relation to bill design





EU and national Regulatory Framework

SWEDISH LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

Electricity Act 1997:857 as last amended by Law 2017:740 to be effective on 01/01/2018

On the activities related to the production, distribution and sale of electricity

Act on sustainability criteria for biofuels and liquid biofuels 2010: 598 as last amended by Act 2016/17:217 of 29/06/2017

On the promotion of energy use from renewable energy sources in order to reduce greenhouse gas emissions.

Act on sustainability criteria for biofuels and liquid biofuels 2010: 598 as last amended by Act 2016/17:217 of 29/06/2017

On the promotion of energy use from renewable energy sources in order to reduce greenhouse gas emissions.

Implementation of Energy Efficiency and Energy Performance of Buildings Directives 2016/17:FPM43 of 22/12/2016

Law on Energy Declaration for Buildings 2006: 985 as last amended by Law 2013:733 of 01/11/2013

On the measures to promote efficient energy use and a good indoor environment in buildings.

Law on Confidentiality of Cooperation Between European Energy Regulators 2012/13:7 of 20/12/2012

On the application of confidentiality in an agency's activities relating to intra-EU cooperation in the oversight of the electricity and natural gas markets.

Third Internal Market Package for Electricity and Natural Gas 2010/11:70 of 24/03/2011

On the regulation of the market for electricity and natural gas.

Government Bill 2010/11:56 of 20/01/2011

On handling the extremely rare situations that require interruptions or limitations of electricity consumption in order to maintain the balance of the electrical system.

Law for a Coherent Climate and Energy Policy 2008/09:163 of 11/03/2009

On a proposal for a sustainable energy policy for environment, competitiveness and security

Marketing Act 2008:486 as last amended by Law 2017:695 to be effective on 03/01/2018

On the promotion of the interests of consumers and industry in the marketing of products and to counteract marketing that is unfair to consumers and traders

Law on Distance Contracts and Agreements Outside Business Premises 2005:59 as last amended by Law 2016:1028 of 29/11/2016

On consumer protection for distance contracts and agreements outside business premises.

Consumer Purchase Act 1990:932 as last amended by Law 2014:11 of 13/06/2014

On consumers rights when there is a trade of goods and / or services between sellers and buyers.

ALTERNATIVE DISPUTE RESOLUTION

Law on Alternative Dispute Resolution in Consumer Relations 2015:671 of 12/11/2015

On alternative dispute resolution initiated by a consumer in respect of his or her claim against a trader if the claim derives from a contract of purchase of goods or services between the consumer and the trader.

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | SWEDEN

Main bodies and contact details

Energy Regulator	Energimarknadsinspektionen/ Swedish Energy Markets Inspectorate (EI) Box 155, 631 03 Eskilstuna Website: http://www.ei.se	
Single Point of Contact	Konsumenternas energimarknadsbyrå (Swedish Consumer Energy Markets Bureau) Box 24226 -104 51 Stockholm Website: http://www.energimarknadsbyran.se/	
Price Comparison Tools	Compricer Website : https://www.compricer.se	Elpriskollen Website: https://www.ei.se/elpriskollen/
	EI Website: https://www.el.se/	Elprisguiden Website: https://www.elprisguiden.se/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Swedish Consumer Agency / Consumer Ombudsman Konsumentverket/KO, Box 48, 651 02 Karlstad Website: http://www.konsumentverket.se	Swedish Energy Agency / Energimyndigheten Gredbyvägen 10 Eskilstuna, Rosenlundsgatan 9 Stockholm Website: http://www.energimyndigheten.se
Body with responsibilities relating to competition	Swedish Competition Authority / Konkurrensverket Torsgatan 11, SE-103 85 Stockholm Website: http://www.konkurrensverket.se/	
Alternative Dispute Resolution Entity	Allmänna reklamationsnämnden – National Board for Consumer Complaints (ARN) Teknologgatan 8C, Stockholm Website: http://www.arn.se	
Other relevant bodies and consumer organisations	The Swedish Consumers' Association Sveriges Konsumenter Sveavägen 90 – SE-102 32 Website: http://www.sverigeskonsumenter.se	



COUNTRY FICHE

UNITED KINGDOM



Key take-aways

This section presents a general summary of the key observations for United Kingdom on the topics highlighted below



Pre-contractual Information

Offers

- The offers are presented in English
- On average, 64 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 64 tariffs, 18 household electricity offers, 16 household natural gas offers, 22 household mix electricity and gas offers, 5 '100% green offers' and 3 self-generation tariffs are offered
- 3 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Schedules 1 & 2 of the Consumer Contracts Regulations regulate the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

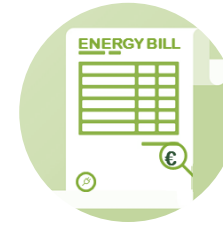
Switching fees & Contract termination fees

- Switching and contract termination* are free of charge in the United Kingdom (hereafter 'the UK') as ensured by the Electricity and Gas acts, Art. 24.8(b)
- Additional information on switching and contract termination is provided to customers on Regulator's (Ofgem) website**
- Energy switching has been promoted by the national Regulator through a number of government funding advertisements to encourage customers to switch and save energy
- A consumer organisation (Which?) conducted a collective switching campaign***



Price Comparison Tools

- There are 16 Price Comparison tools in the UK in total (sample of 5 PCTs studied)
- 5 out of 5 PCTs studied are privately owned, 3 out of 5 PCTs studied are certified by the Office of Gas and Electricity Markets (Ofgem)
- Ofgem published a 'Confidence Code' consisting of a voluntary accreditation scheme for PCTs in the energy sector in September 2017****
- 0 out of 5 PCTs clearly state on their websites to cover 100% of the energy market in the UK in terms of energy suppliers and available offers, based on a sample of 5 PCTs



Energy Bills

- The regulation Electricity Exchange and Measurement Regulation 1050/2004 on electricity and gas bills regulate the energy bills for electricity and gas suppliers
- The national legislation through the Electricity Act and Gas Act (Art. 21B & 31A) regulates billing frequency
- The Regulator published a page aimed at helping consumers to understand their bills*****
- The trade association for the UK energy industry (Energy UK) published a practical guide, the 'Code of practice for accurate bills' which represents a series of voluntary commitments that go beyond the supplier license conditions regarding billing content*****

*Applicable to non-fixed term contracts only

**Ofgem, 'How to switch energy supplier and shop for a better deal': <https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/how-switch-energy-supplier-and-shop-better-deal>

***BEUC, The European Consumer Organisation, Collective energy switch: http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf

****Ofgem, 1 September 2017, 'Ofgem Confidence Code': https://www.ofgem.gov.uk/system/files/docs/2017/08/august_decision_-_code_-_final_august_31_2017_0.pdf

*****Ofgem, 'Understand your gas and electricity bills': <https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/understand-your-gas-and-electricity-bills>

*****Energy UK practical guide on bill content: <http://www.energy-uk.org.uk/files/docs/Industry%20codes/Code%20of%20Practice%20for%20accurate%20bills/Codeofpracticeforaccuratebills2017.pdf>





Pre-contractual Information

General overview



The offers are presented in English



64

Tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers



3 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the schedules 1 & 2 of the Consumer Contracts Regulations, before the consumer is bound by an on-premises contract, the trader must give or make available to the consumer the information described in Schedule 1 in a clear and comprehensible manner, if that information is not already apparent from the context

The information to be provided to the consumer relating to on-premises contracts:

- The main characteristics of the goods or services, to the extent appropriate to the medium of communication and to the goods or services
- The identity of the trader (such as the trader's trading name), the geographical address at which the trader is established and the trader's telephone number
- The total price of the goods or services inclusive of taxes, or where the nature of the goods or services is such that the price cannot reasonably be calculated in advance, the manner in which the price is to be calculated
- Where applicable, all additional delivery charges or, where those charges cannot reasonably be calculated in advance, the fact that such additional charges may be payable

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **18 household electricity offers, 16 household natural gas offers** and **22 household mix electricity and gas offers**
- 2 out of 6 energy suppliers offer **5 '100% green offers' in total** (1 energy supplier offers 2 green offers and 1 energy supplier offers 3 green offers)
- 2 out of 6 energy suppliers offer **3 self-generation offers in total** (1 energy supplier offers 1 green offers and 1 energy supplier offers 2 green offers)

Bundled offers

1 out of 6 energy suppliers studied offer **2 bundled services in total**

Source: National Regulator OFGEM Survey

Sample Review performed by Deloitte on 6 energy suppliers

*Covers only an extract of the national legal requirements. Details can be found in the draft final report



Switching fees and contract termination fees

According to the Standard conditions of electricity supply license, Condition 14A, Condition 24 and the Electricity and Gas acts, Art. 24.8(b):

- The supplier must apply the switching within 3 weeks after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 28 days after the consumer's request
- Contract termination is free of charge**

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 5 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

Additional information on switching and contract termination is provided to customers on the website of Ofgem***

A consumer organisation (Which?) conducted a collective switching campaign****

Energy switching has been promoted by the national Regulator through a number of government funding advertisements to encourage customers to switch and save energy



**Applicable to non-fixed term contracts only

***Ofgem, 'How to switch energy supplier and shop for a better deal:

<https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/how-switch-energy-supplier-and-shop-better-deal>

****BEUC, The European Consumer Organisation, Collective energy switch:

http://www.beuc.eu/publications/beuc-x-2017-074_collective_energy_switch_factsheet_2017.pdf



Price Comparison Tools (PCTs)

General overview



16

There are 16 Price Comparison tools in the UK (sample of 5 PCTs studied)



5 out of 5 PCTs studied are privately owned, 3 out of 5 PCTs studied are certified by the Office of Gas and Electricity Markets (Ofgem)



Ofgem published a 'Confidence Code' consisting of a voluntary accreditation scheme for PCTs in the energy sector in September 2017*



0 out of 5

PCTs clearly state on their websites to cover 100% of the energy market in the UK in terms of energy suppliers and available offers, based on a sample of 5 PCTs

Market coverage

Out of 5 privately owned PCTs studied:

- 2 PCTs cover 100% of the energy market in terms of suppliers and do not clearly indicate their market coverage in terms of offers
- 1 PCT covers 33 suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT covers 44 suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT covers 61 suppliers and does not clearly indicate its market coverage in terms of offers

Business model

- 2 out of 5 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 2 out of 5 PCTs studied display information as regards the **source of data** presented on their websites
- 1 out of 5 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 3 out of 5 PCTs studied present information regarding **the switching procedures** of their websites
- 0 out of 5 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 5 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 2 out of 5 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the following criteria**:

At a minimum

- Payment method
- Supplier

In addition***

- Contract duration
- Green plans
- Exit fees
- Quality of service

The **first results pages***** on the PCT website shows per offer at a minimum:

- Exit fee
- Estimated amount of savings
- Supplier name
- Tariff name
- Link to offer details
- Contract duration
- Link to switch
- Payment method



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- Billing methods
- Payment methods

In addition***

- Contract conditions
- 100% Online tariff
- % Green energy

*Ofgem, 1 September 2017, 'Ofgem Confidence Code':

https://www.ofgem.gov.uk/system/files/docs/2017/08/august_decision_-_code_-_final_august_31_2017_0.pdf

**Based on a sample of 5 PCTs

***In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



4 out of 6

Energy suppliers explain the content of their bills on their website



4 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



2 out of 4

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 4 example bills)

Legal requirements

The national legislation through the Electricity Act and Gas Act (Art. 21B & 31A) regulates the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- A comparison of the consumption with the same period of the previous year
- Tariff name
- Annual consumption details
- Estimated annual costs
- Start and end date of the contract
- Any terms which it is reasonable in all the circumstances for that person to be required to accept
- Switching and contract termination information (including termination fees)

Moreover, the trade association for the UK energy industry, "Energy UK", published a practical guide* aimed at driving improved standards of performance and providing a common framework around which energy suppliers can build better processes and controls for billing their customers

Frequency of consumption statement

Art. 21B.5 of both the Electricity Act and Gas Act ensure that the consumers receive **at least twice a year** (or quarterly on demand) energy bill presenting their consumption and cost (e.g. cost of electricity, gas and breakdown of prices)

Art. 21A.1 of both the Electricity Act and Gas Act ensure that on demand, consumers can receive a bill containing the amount of electricity or gas supplied, how much it has been estimated by the supplier, the premises to which the supply was made and the Meter Point Administration Number (MPAN)

Content

According to the Regulator, **consumers** can ask the energy suppliers to **amend the following aspects of their energy bills**:

- Frequency of billing
- Payment methods
- Media used

The **bills** analysed (sample of 4 example bills) usually provide information on the following elements:

- Account number and contact details
- Bill date and period
- Current and previous balance
- Charges, breakdown and VAT
- Payment terms and due date
- Supplier's details
- Supplier's logo
- Tariffs details
- Account information
- Breakdown of consumption
- Breakdown of prices
- MPAN
- Cheapest offer to pay less and savings

2 out of the 4 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 4 example bills)

Initiatives, non-binding measures and guidance documents

The Regulator published a page aimed at helping consumers to understand their bills*

The UK organization Citizen's Advice published a **practical guide** aimed at helping customers understand the content of their energy bill**

*Ofgem, 'Understand your gas and electricity bills: <https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/understand-your-gas-and-electricity-bills>

**Energy UK practical guide on bill content: <http://www.energy-uk.org.uk/files/docs/Industry%20codes/Code%20of%20Practice%20for%20accurate%20bills/Codeofpracticeforaccuratebills2017.pdf>





EU and national Regulatory Framework

ENGLISH LEGAL FRAMEWORK

APPLICABLE NATIONAL REGULATIONS

The Electricity and Gas Regulations 2017 No. 493

On the organization of the electricity and gas markets

The Energy Efficiency Regulations 2014 No. 1403

On measures in order to promote energy efficiency

The Renewable Transport Fuel Obligations Order 2011 No. 2937

On the promotion of renewable sources applied to transport, renewable transport fuel use and mix of fossil and renewable fuels

The Electricity Regulations 2009 No. 3191

On the information and other documents that are required to be submitted with applications for generation, transmission, distribution, supply and interconnector licenses, and for modifications of an area of transmission licenses and extensions, or restrictions of supply and distribution licenses

The Gas and Electricity Regulations 2008 No. 1898

On standards for the handling of consumer complaints by regulated providers and for the supply of information to consumers about the prescribed standards and levels of compliance with those standards

APPLICABLE NATIONAL LAWS

Energy Act 2011

On measures for energy efficiency, the regulation for the private energy sector for England, Wales, Scotland, and Northern Ireland separately, reducing emissions, consumption and tariffs, and security of energy supplies

Energy Act 2010

on carbon capture and storage and decarbonization, schemes for reducing fuel poverty, and regulation of gas and electricity markets

Energy Act 2008

On gas importation and storage, electricity from renewable sources, decommissioning of energy installations and provisions relating to oil and gas

Energy Act 2004

On the civil nuclear industry, the sustainability and renewable energy sources, and the energy regulation

Utilities Act 2000

On the new Regulatory arrangements concerning the electricity and gas markets and authorities.

Gas Act 1986 and 1995

To make new provision with respect to the supply of gas through pipes and certain related matters

Electricity Act 1989

To make new provision with respect to the supply of electricity through electric lines and the generation and transmission of electricity for such supply

ALTERNATIVE DISPUTE RESOLUTION

Alternative Dispute Resolution for Consumer Disputes Regulations 2015 No. 1392

SOFT LAWS

Consumer Rights Act 2015

On consumer rights regarding provision of goods or services by suppliers

The Consumer Contracts Regulations 2013 No. 3124

The Business Protection from Misleading Marketing Regulations 2008 No. 1276

Code of practice for accurate bills

Represents a series of voluntary commitments that go beyond the supplier license conditions

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | UNITED KINGDOM

Main bodies and contact details

Energy Regulator	Ofgem (Office of the Gas and Electricity Markets) 9 Millbank, London SW1P 3GE Website: http://www.ofgem.gov.uk/		
Single Point of Contact	Citizen's Advice 3rd Floor North, 200 Aldersgate, London, EC1A 4HD Website: http://www.citizensadvice.org.uk		
Price Comparison Tools	My Utility Genius Website: http://www.myutilitygenius.co.uk	Energy Linx Website: http://www.energylinx.co.uk	Who is cheapest Website: http://www.whoscheapest.co.uk/
	The Green energy shop Website: http://www.theenergyshop.com/	Energy Helpline Website: http://www.energyhelpline.com	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Competition and Markets Authority Victoria House, 37 Southampton Row, London WC1B 4AD, United Kingdom Website: https://www.gov.uk/government/organisations/competition-and-markets-authority		
Body with responsibilities relating to competition	Competition and Markets Authority Energy UK Charles House 5-11 Regent Street, London SW1Y 4LR Website: http://www.energy-uk.org.uk/		
Alternative Dispute Resolution Entity	Ombudsman Services (previously the Energy Ombudsman) Wilderspool Park, Greenall's Avenue, Warrington WA4 6HL Website: http://www.energy-ombudsman.org.uk/		
Other relevant bodies and consumer organisations	Which? 2 Marylebone Road, London NW1 4DF Website: http://www.which.co.uk/		Citizen's Advice 3rd Floor North, 200 Aldersgate, London, EC1A 4HD Website: http://www.citizensadvice.org.uk



COUNTRY FICHE

ICELAND



Key take-aways

This section presents a general summary of the key observations for Iceland on the topics highlighted below



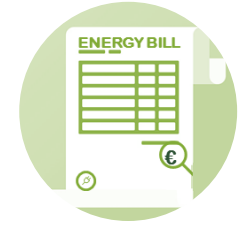
Pre-contractual Information Offers

- The offers are presented most of the time in Icelandic and sometimes in English
- On average, 5 tariffs are offered on the energy suppliers' websites, based on a sample of 3 suppliers
- Out of these 5 tariffs, 2 household electricity offers, 0 household natural gas offers, 0 household mix electricity and gas offers, 3 '100% green offers' and 0 self-generation tariffs are offered
- 3 out of 3 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 3 suppliers
- Regulation Electricity Exchange and the Measurement Regulation 1050/2004 on electricity and gas bills (Art. 4 and 7) regulate the minimum requirements regarding the content of presented to consumers



Price Comparison Tools

- There is 1 Price Comparison tool in Iceland in total (sample of 1 PCT studied)
- The PCT is owned by the National Energy Authority (OS)
- There is no certification body nor scheme in Iceland
- 0 out of 1 PCT clearly states on its website to cover 100% of the energy market in Iceland in terms of energy suppliers and available offers, based on a sample of 1 PCT



Energy Bills

- The Regulation Electricity Exchange and Measurement Regulation 1050/2004 on electricity and gas bills regulates the energy bills for electricity and gas suppliers
- The regulation does not specify at which frequency the consumers should receive statements presenting their consumption





Pre-contractual Information

General overview



The offers are presented in Icelandic and sometimes in English



5

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 3 suppliers



3 out of 3

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 3 suppliers



0 out of 3

Suppliers apply switching fees, based on a sample of 3 suppliers

Legal requirements

The national legal framework does not include minimum requirements on pre-contractual information

According to the Regulation Electricity Exchange and Measurement Regulation 1050/2004 on electricity and gas bills, Art. 4 and 7, an energy provider is obliged to disclose terms of distribution (without the price of electricity) in its electricity sales contracts, if requested

An energy provider is obliged to deliver to the user electricity in accordance with a power sales agreement. For this purpose, energy providers must:

- Agree on a sales contract with customers
- Negotiate and provide payments for electricity transactions with a processing company or other sales company
- Enter into a contractual agreement with a carrier of a carrier for payment of equalization and to pay for its payment
- Provide collected charges for broadcasting and distribution services for distribution networks
- Collect payments for the above-mentioned expense items by users

Offers and green energy offers studied

- The 3 energy suppliers offer a total of **2 household electricity offers, 0 household natural gas offers and 0 household mix electricity and gas offers**
- 3 out of 3 energy suppliers offer **3 '100% green offers' in total** (3 energy suppliers offer each 1 green offer)
- 0 out of 3 energy suppliers offer **self-generation offers**

Bundled offers

0 out of 3 energy suppliers studied offer **bundled services**



Switching fees and contract termination fees

According to the Regulation 1050/2004, Art. 9 and the Regulation 1040/2005, Art. 25:

- The supplier must apply the switching within 1 to 3 months after the consumer's request
- Switching is free of charge
- The supplier must terminate the contract within 3 months

There are **no requirements included in the national legislation** on:

- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 3 suppliers studied **apply switching fees**
- 0 out of 3 suppliers studied **provide information regarding switching on their website**





Price Comparison Tools (PCTs)

General overview



1

There is 1 Price Comparison tool website in Iceland



The Price Comparison tool is owned by the Regulator ((National Energy Authority (OS))



There is no certification body nor scheme in Iceland



0 out of 1

PCT clearly states on its website to cover 100% of the energy market in Iceland in terms of energy suppliers and available offers, based on a sample of 1 PCT

Market coverage

The 1 PCT owned by the national Regulator covers:

- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 0 out of 1 PCT studied **clearly state on their websites to be independent from energy suppliers**
- 0 out of 1 PCT studied displays information as regards the **source of data** presented on the website
- 0 out of 1 PCT studied offers consumers the possibility to **directly switch suppliers** from its website
- 1 out of 1 PCT studied presents information regarding **the switching procedures** of its website
- 0 out of 1 PCT studied explains **how often data** presented on its website **is being updated**
- 0 out of 1 PCT studied give consumers **the possibility to give their review of the PCT website**
- 0 out of 1 PCT studied provides an **effective procedure to report incorrect information on published offers**



Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers cannot be filtered by any other criteria*

The **first results pages** on the PCT websites do not provide other information other than the offers' price

Non-price elements

The user cannot compare any **non-price elements of the offer** on the PCT website



Energy Bills

General overview



1 out of 3

Energy suppliers explain the content of their bills on their website



1 out of 3

Energy suppliers provide an explanation of the price breakdown on their websites



1 out of 1

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 1 example bills)

Legal requirements

The Regulation Electricity Exchange and Measurement Regulation 1050/2004 on electricity and gas bills regulates the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- Breakdown on price (unit price, charges for transport, distribution services
- In the bills of customers in areas where a rural tariff is in force, information about the amount of the contribution to the reduction of distribution costs shall be provided

Frequency of consumption statement

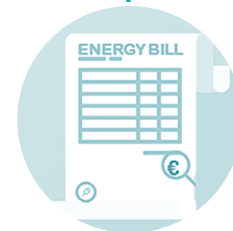
The regulation does not specify at which frequency the consumers should receive statements presenting their consumption

Content

The **bills** analysed (sample of 1 example bills) usually provide information on the following elements:

- Summary of the bill
- Customer details
- Supplier's logo
- Price breakdown

1 out of the 1 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 1 example bills)





EU and national Regulatory Framework ICELANDIC LEGAL FRAMEWORK

APPLICABLE NATIONAL LAWS

1040/2005 - Execution of Electricity Act Regulation

On the processing, transport, distribution and trading of electricity in Icelandic territory

1050/2004 - Electricity Exchange and Measurement Regulation

On minimum requirements for electricity meters and measuring equipment, measurement of electricity, recording and handling of metrics and dissemination of information for the settlement of electricity trading

87/2003 - NEA Act

65/2003 - Electricity Act

48/2003 – Sale of Goods to Consumers Act

78/2002 - Subsidy of Domestic Heating Act

ALTERNATIVE DISPUTE RESOLUTION

53/1989, on Contractual Arbitration

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

Concerning measures to safeguard security of electricity supply and infrastructure investment (Text with EEA relevance)



Directive 93/13/EEC

Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law

NOTES | ICELAND

Main bodies and contact details

Energy Regulator	National Energy Authority (OS) Orkustofnun Grensasvegur 9, 108 Reykjavik Website: http://www.nea.is/
Single Point of Contact	Not found at the time of the study
Price Comparison Tools	Orkustofnun Grensasvegur 9, 108 Reykjavik Website: http://www.orkusetur.is/reiknivalar/raforka/raforkuverd/
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	The Ministry of Industries and Innovation Skulgata 4, 150 Reykjavik Website: http://eng.atvinnuvegaraduneyti.is/
Body with responsibilities relating to competition	Icelandic Competition Authority Borgartun 26, 125 Reykjavik Website: http://en.samkeppni.is/
Alternative Dispute Resolution Entity	National Energy Authority
Other relevant bodies and consumer organisations	Iceland's Consumer Association Neytendasamtokin (NS) Hverfisgotu 105 – 101 Reykjavik Website: https://www.ns.is/en



COUNTRY FICHE

NORWAY

Key take-aways

This section presents a general summary of the key observations for Norway on the topics highlighted below



Pre-contractual Information Offers

- The offers are presented most of the time in Norwegian and sometimes in English
- On average, 95 tariffs are offered on the energy suppliers' websites, based on a sample of 6 suppliers
- Out of these 95 tariffs, 52 household electricity offers, 0 household natural gas offers, 0 household mix electricity and gas offers, 43 '100% green offers' and 0 self-generation tariffs are offered
- 5 out of 6 suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers
- The Law on duty of disclosure and remedies for distance selling and sales outside of permanent business premises (LOV-2014-06-20-27 "Lov om opplysningsplikt og angrerett ved fjernsalg og salg utenom faste forretningslokaler (angrerettloven)), Chapter 2 regulates the minimum requirements regarding the content of offers and the provision of pre-contractual information presented to consumers

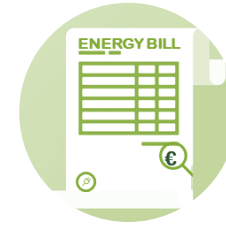
Switching fees & Contract termination fees

- There are no requirements included in the national legislation on switching and contract termination fees
- The Norwegian Water Resources and Energy Directorate published a 'Q&A' page on its website aimed at helping customers understand the procedure of switching energy suppliers (e.g. documents needed to start the procedure, a link to a PCT, information to send to the new supplier)*



Price Comparison Tools

- There are 5 Price Comparison tools in Norway in total (sample of 3 PCTs studied)
- 3 out of 3 PCTs studied are privately owned
- There is no certification body nor scheme in Norway
- 0 out of 3 PCTs clearly state on their websites to cover 100% of the energy market in Norway in terms of energy suppliers and available offers, based on a sample of 3 PCTs



Energy Bills

- The FOR-2015-06-12-705, -Art. 7-2 "Forskrift om endring i forskrift om måling, avregning og samordnet opptreden ved kraftomsetning og fakturering av netjtjenester" regulates the energy bills for electricity and gas suppliers
- The regulation does not specify at which frequency the consumers should receive statements presenting their consumption





Pre-contractual Information

General overview



The offers are presented in Norwegian and sometimes in English



95

Tariffs are offered on the energy suppliers' websites, on average, based on a sample of 6 suppliers



5 out of 6

Suppliers provide detailed information regarding renewable energy sources on their websites, based on a sample of 6 suppliers



0 out of 6

Suppliers apply switching fees, based on a sample of 6 suppliers

Legal requirements*

According to the law on duty of disclosure and remedies for distance selling and sales outside of permanent business premises (LOV-2014-06-20-27 "Lov om opplysningsplikt og angrerett ved fjernsalg og salg utenom faste forretningslokaler (angrerettloven) – Chapter 2), the trader shall provide the consumer with information on the following topics, before a distance contract or off-premises contract is concluded:

- The most important properties of the good or service
- Where relevant, the digital content's functionality, including the relevant technical protection measures
- The digital content's ability to interact with hardware and software which the trader knows about or is expected to know about
- The trader's identity
- The costs of relying on means of distance communication
- The payment
- The delivery, delivery deadline and performance arrangements
- How the trader deals with complaints

Offers and green energy offers studied

- The 6 energy suppliers offer a total of **52 household electricity offers**, **0 household natural gas offers** and **0 household mix electricity and gas offers**
- 6 out of 6 energy suppliers offer **44 '100% green offers' in total** (2 suppliers offer 1 green offer each, 1 supplier offers 2 green offers, 1 supplier offers 4 green offers, 1 supplier offers 13 green offers and 1 supplier offers 22 green offers)
- 0 out of 6 energy suppliers offer **self-generation offers**

Bundled offers

0 out of 6 energy suppliers studied offer **bundled services**



Switching fees and contract termination fees

According to the FOR-1999-03-11-301, chapter 2 §2-1:

- The supplier must apply the switching within 1 month after the consumer's request

There are **no requirements included in the national legislation** on:

- Switching fees
- Timeframe within which the supplier must apply the contract termination
- Contract termination fees

Practices in the energy market in relation to switching

- 0 out of 6 suppliers studied **apply switching fees**
- 3 out of 6 suppliers studied **provide information regarding switching on their website**

Initiatives, non-binding measures and guidance documents

The Norwegian Water Resources and Energy Directorate published a 'Q&A' page on its website aimed at helping customers understand the procedure of switching energy suppliers (e.g. documents needed to start the procedure, a link to a PCT, information to send to the new supplier)**





Price Comparison Tools (PCTs)

General overview



5

There are 5 Price Comparison tools in Norway in total (sample of 3 PCTs studied)



3 out of 3 PCTs studied are privately owned



There is no certification body nor scheme in Norway



0 out of 3

PCTs clearly state on their websites to cover 100% of the energy market in Norway in terms of energy suppliers and available offers, based on a sample of 3 PCTs

Market coverage

Out of 3 privately owned PCTs studied:

- 1 PCT covers the largest suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT covers more than 120 suppliers and does not clearly indicate its market coverage in terms of offers
- 1 PCT does not clearly indicate its market coverage in terms of suppliers and offers

Business model

- 2 out of 3 PCTs studied **clearly state on their websites to be independent from energy suppliers**
- 3 out of 3 PCTs studied display information as regards the **source of data** presented on their websites
- 2 out of 3 PCTs studied offer consumers the possibility to **directly switch suppliers** from their websites
- 0 out of 3 PCTs studied present information regarding **the switching procedures** of their websites
- 2 out of 3 PCTs studied explain **how often data** presented on their websites **is being updated**
- 0 out of 3 PCTs studied give consumers **the possibility to give their review of the PCT websites**
- 0 out of 3 PCTs studied provide an **effective procedure to report incorrect information on published offers**

Information presentation

Offers are **ranked** from the cheapest one to the most expensive one. Offers can be filtered by the criteria*:

At a minimum

- Payment method

In addition**

- Address
- Energy mix
- Supplier
- Type of housing

The **first results pages**** on the PCT websites show per offer at a minimum:

- Supplier
- Tariff name
- Link

- Energy source
- Price
- Supplier's logo



Non-price elements

The user can compare the following **non-price elements of the offer** on the PCT websites:

At a minimum

- % Energy mix
- Billing method
- Payment method

In addition**

- % of client satisfaction
- 100% Online tariff
- Customer service
- Quality of service

*Based on a sample of 3 PCTs

**In addition, some websites include other non-price elements, criteria and details



Energy Bills

General overview



2 out of 6

Energy suppliers explain the content of their bills on their website



1 out of 6

Energy suppliers provide an explanation of the price breakdown on their websites



0 out of 2

Energy suppliers provide information regarding the elements required for switching on the example bills available on their websites (sample of 2 example bills)

Legal requirements

The FOR-2015-06-12-705, Art. 7-2 "Forskrift om endring i forskrift om måling, avregning og samordnet opptreden ved kraftomsetning og fakturering av netjtjenester" regulates the energy bills for electricity and gas suppliers

According to the national legal framework, suppliers need to deliver an energy bill that contains the following minimum requirements:

- A graph comparing the previous year's consumption at each settlement date
- Enova SF's telephone number (government enterprise responsible for promotion of environmentally friendly production and consumption of energy) to reach the free telephone service allowing consumers to receive advice on energy savings
- Switching procedures
- Link to the Regulator's PCT
- Complaints handling procedures
- Price
- Power volumes

The legal requirements further state the invoice should be transparent and easy to understand

Frequency of consumption statement

The regulation does not specify at which frequency the consumers should receive statements presenting their consumption

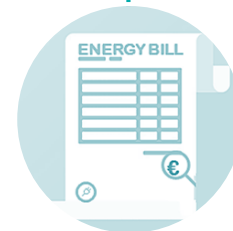


Content

The **bills** analysed (sample of 4 example bills) provide usually information on the following elements:

- Supplier's logo
- Details of the supplier
- Payment details
- Graphic comparison of previous and current consumption
- Customer data
- Bill number
- Deadline for payment

0 out of the 2 energy suppliers providing example bills display information on the **elements required for switching on their bills** (sample of 2 example bills)





EU and national Regulatory Framework NORWEGIAN LEGAL FRAMEWORK

APPLICABLE NATIONAL LAW

FOR-2004-12-23-1851, "Forskrift om kvoteplikt og handel med kvoter for utslipp av klimagasser (klimakvoteforskriften)"

Regulations on quota quotas and trading of greenhouse gas emission allowances (climate quota regulation)

FOR-2014-06-20-777, "Forskrift om opplysningsplikt og angrerett mv."

Regulations on duty of disclosure and redress

LOV-2014-06-20-27, "Lov om opplysningsplikt og angrerett ved fjernsalg og salg utenom faste forretningslokaler (angrerettloven)"

Law on duty of disclosure and remedies for distance selling and sales outside of permanent business premises

FOR-2011-02-23-190, "Forskrift om miljøvennlig utforming av energirelaterte produkter (økodesignforskriften)"

Regulations on environmentally friendly design of energy-related products

FOR-2011-06-24-726, "Forskrift om endring i forskrift om måling, avregning og samordnet opptreden ved kraftomsetning og fakturering av netjtjenester"

Regulations amending the regulation on measurement, settlement and concerted conduct of power sales and billing of online services

LOV-2009-01-09-2, "Lov om kontroll med markedsføring og avtalevilkår mv. (markedsføringsloven)"

Law on marketing control and contractual terms, etc. (Marketing Act)

FOR-2004-06-01-931, "Forskrift om begrensning av forurensning (forurensningsforskriften)"

Regulations on pollution control (Pollution Control)

ALTERNATIVE DISPUTE RESOLUTION

LOV-2016-06-17-29, "Lov om godkjenning av klageorganer for forbrukersaker"

Law on the approval of complaints agencies for consumer matters. Concerning alternative dispute resolution for consumer dispute

EUROPEAN DIRECTIVES

Directive 2013/11/EU

Concerning alternative dispute resolution for consumer disputes and amending Regulation (EC) No 2006/2004 and Directive 2009/22/EC



Directive 2012/27/EU

Concerning energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC, OJ L 315, 14.11.2012



Directive 2011/83/EU

Concerning consumer rights, amending Directive 93/13/EEC, Directive 1999/44/EC and repealing Council Directive 85/577/EEC and Directive



Directive 2009/73/EC

Concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, OJ L 211, 14.8.2009, p. 94–136



Directive 2009/72/EC

Concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC



Directive 2009/28/EC

Concerning the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC



Directive 2005/29/EC

Concerning unfair business-to-consumer commercial practices in the internal market, amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC and Regulation (EC) No 2006/2004



Directive 2005/89/CE

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Concerning unfair terms in consumer contracts, OJ L 095, 21/04/1993



EU Directive transposed into national law



EU Directive not transposed into national law



NOTES | NORWAY

Main bodies and contact details

Energy Regulator	Norges vassdrags – og energidirektorat / The Norwegian Water Resources and Energy Directorate (NVE) Middelthunsgate 29, N-0301 Oslo Website: http://nve.no	
Single Point of Contact	Not found at the time of the study	
Price Comparison Tools	Forbrukernet Website: http://forbrukernet.com/	Strømpris Website: https://strompris.no/en/home/
	Elskling Website: https://elskling.no/	
National authorities responsible for enforcement of consumer protection legislation (horizontal and sectoral specific – energy)	Ministry of Petroleum and Energy (MPE) Akersgata 59, 0033 Oslo, Postboks 8148 Dep, 0033 Oslo Website: https://www.regjeringen.no/	Norwegian Petroleum Directorate (NPD) Professor Olav Hanssens vei 10 4021 Stavanger, 4003 Stavanger Website: https://npd.no/
Body with responsibilities relating to competition	Konkurransetilsynet (Competition Authority) P.O. Box 439 Sentrum NO-5805 Bergen Website: http://konkurransetilsynet.no/en/	
Alternative Dispute Resolution Entity	NVE	
Other relevant bodies and consumer organisations	Consumer Council Forbrukerradet Skippergata 8-10, Oslo NW – 0105 Website: https://forbrukerradet.no	



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