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**Guidelines of Good Practice on  
Comparison Tools in the New Energy  
Market Design  
Updated Recommendations**

**Ref: C17-CEM-107-04  
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## INFORMATION PAGE

### Abstract

In July 2012, the CEER Guidelines of Good Practice (GGP) on Price Comparison Tools presented 14 recommendations for energy price comparison tools which covered the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correctness and accuracy, user-friendliness, accessibility and customer empowerment.

Due to the fact that nearly five years had elapsed since the publication of the previous GGP, and considering the focus that the European Commission has put on comparison tools of late, CEER decided to check whether and how the existing recommendations can be enhanced.

This document presents the updated guidelines, along with two additional guidelines. Although the previous GGP on comparison tools of 2012 remain essentially valid, as a result of this revision some novel aspects are introduced that derive from the experience of the past five years, technological and market evolution and the stakeholders consultation.

These updated GGP should be considered as a list of best market practices, but are not intended to provide a base of minimum requirements for ensuring the reliability of energy price comparison tools.

### Target Audience

Energy suppliers, traders, prosumers, electricity and natural gas customers, electricity and natural gas industry, customer representative groups, network operators, Member States, academics and other interested parties.

### Keywords

Comparison tools, consumer rights; customer protection & empowerment; supplier switching; price, contracts, tariffs; reliability; simplicity; 3rd Package, vulnerable consumers

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## Related Documents

### CEER documents

- “Guidelines of Good Practice on Comparison Tools in the New Energy Market Design – Public Consultation Evaluation of Responses”, December 2017, Ref. C17-CEM-105-03, <https://www.ceer.eu/1256>
- “Consumer Empowerment”, CEER White Paper series (paper # III) on the European Commission’s Clean Energy Proposals, May 2017. <https://www.ceer.eu/white-papers>
- “CEER 2017 Handbook for National Energy Regulators - How to assess retail market functioning”, January 2017, Ref. C16-SC-52-03, <https://www.ceer.eu/1256>
- “Guidelines of Good Practice on Comparison Tools on the New Energy Market Design – A public consultation paper”, November 2016, Ref. C16-CEM-95-03, [https://www.ceer.eu/eeer\\_consult/closed\\_public\\_consultations/customers/cts](https://www.ceer.eu/eeer_consult/closed_public_consultations/customers/cts)
- “CEER Report on Commercial Barriers to Supplier Switching in EU Retail Energy Markets”, July 2016, Ref. C15-CEM-80-04, <https://www.ceer.eu/1257>
- “CEER Benchmarking Report on Removing Barriers to Entry for Energy Suppliers in EU Retail Energy Markets”, April 2016, Ref. C15-RMF-70-03, <https://www.ceer.eu/1257>
- “CEER Position Paper on Well-Functioning Retail Energy Markets”, October 2015, Ref. C15-SC-36-03, <https://www.ceer.eu/1258>
- “CEER Advice on Customer Data Management for Better Retail Market Functioning”, March 2015, Ref. C14-RMF-68-03, <https://www.ceer.eu/1258>
- [Energy Regulation: A Bridge to 2025. Conclusions Paper](#) – ACER-CEER, September 2014.
- “A 2020 Vision for Europe’s Energy Customers”, BEUC – CEER Joint Statement, November 2012; updated June 2014, <https://www.ceer.eu/documents/104400/-/-/d5def98b-8bcf-46c2-a72b-b92ef011cd72>
- “Guidelines of Good Practice on Price Comparison Tools”, July 2012, Ref. C12-CEM-54-03, <https://www.ceer.eu/1263>
- “Guidelines of Good Practice on Electricity and Gas Retail Market Design, with a Focus on Switching and Billing”, 24 January 2012, Ref. C11-RMF-39-03, <https://www.ceer.eu/1263>



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## EXECUTIVE SUMMARY

Easy access to neutral and objective information on available offers is one of the key elements that can empower electricity and natural gas customers to play an active role in retail markets, enabling them to take advantageous decisions about choosing their new contract, or about whether or not to switch from their current contract or provider.

Comparison tools (CTs) can offer a smart and easy access to this kind of information; it is however crucial to ensure that CTs are actually functioning well, i.e., that they are providing genuine, useful and usable information on both price and other features that are relevant for customers in order for them to be able to make prudent choices. It is equally important that customers feel that they can trust CTs, and that they will be able to take advantage of the information and services that these tools provide.

In July 2012, the [CEER Guidelines of Good Practice on Price Comparison Tools](#) document presented 14 recommendations for energy comparison tools which cover the following themes: independence, transparency, exhaustiveness, clarity and comprehensibility, correctness and accuracy, user-friendliness, accessibility and customer empowerment.

CEER is aware that retail energy markets are evolving significantly due to different factors, including new opportunities offered by the spread of advanced technologies, such as smart meters and smart grids, or by the emergence of new ways to enable consumers to play an active role, such as collective switching schemes or demand response schemes. These developments are already having an impact on how a well-functioning comparison tool should operate, and stronger impacts can be expected in the future.

In November 2016, the “Clean Energy for All Europeans Package”<sup>1</sup> was issued by the European Commission. In the proposed Electricity Directive<sup>2</sup> it is mentioned that Member States (MSs) shall ensure that customers have access, free of charge, to at least one tool comparing the offers of suppliers that meets specific requirements.

Due to the fact that nearly five years had elapsed since the publication of the previous CEER GGP on price comparison tools (GGP-2012), and taking into account the focus that the European Commission has put on comparison tools, CEER decided to investigate whether and how the existing recommendations could be enhanced in order to ensure that they still address, both at present and in the foreseeable future, the issues that energy consumers face when approaching and using CTs.

The updated guidelines are presented in this document. Although the GGP-2012 is essentially valid, as a result of this revision, some new elements are introduced that derive from the experience of the past five years, technological and market evolution and the stakeholders consultation. The updated guidelines, and, in particular, the two new guidelines under the heading of “future developments” should make this update much more future proof compared to the previous version.

These updated guidelines should be considered as a list of best market practices, but are not intended to provide a base of minimum requirements for ensuring the reliability of energy price CTs.

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<sup>1</sup> <https://ec.europa.eu/energy/en/news/commission-proposes-new-rules-consumer-centred-clean-energy-transition>

<sup>2</sup> [Proposals regarding the Directive on common rules for the internal market in electricity \(COM\(2016\) 864 final/2\) and its Annexes \(recast\).](#)



The updated guidelines of good practice

<b>Updated guidelines of good practice</b>	
<b>I</b>	<b>Independence of the tool</b>
1	A comparison tool (CT) must be independent of energy supply companies, giving the user a non-discriminatory overview of the market. The provider of a comparison tool should show all information in a consistent way.
2	Ensuring the reliability of CTs is crucial to protect and empower customers. The best way to achieve this goal can be efficiently defined at national level, taking into account the maturity and competitiveness of both the comparison market and the energy market, and could be implemented with the active role of NRAs or other public bodies. NRAs or another public body may also decide to establish their own reliable CT service where no such private service exists or to complement commercial CTs, and consider ways to promote the service to customers.
<b>II</b>	<b>Transparency</b>
3	CTs should disclose the way they operate, their funding and their owners/shareholders, in order to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers. Advertisements and/or sponsored products should be clearly identified and separated from the comparison results.
<b>III</b>	<b>Exhaustiveness</b>
4	CTs' coverage of the market should be as complete as practicable. If the presented information does not offer a complete overview of the market, the CT should clearly state this before showing the results of the comparison as well as on the comparison results screen. All prices and products covered by the CT and available to the customer on the basis of general selection criteria (e.g. the area where the supply is located, or a given customer segment) should be shown as a first step in the comparison results screen.
<b>IV</b>	<b>Clarity and comprehensibility</b>
5	Costs should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of the unit kWh-price. Any discounts should be clearly described, specifying when those discounts end; discounts which are subject to conditions or restrictions should be clearly separated from total cost estimation. CTs should clearly indicate that prices shown as a total cost are an estimate, as they are based on historic or estimated consumption and on price information available at present. The same warning should be indicated where a CT offers an estimate of potential savings that might be obtained by switching to listed offers. Access to additional information on cost details (e.g. unit prices, cost components...) and on the methodology used for total cost or potential savings estimation should also



	be made available to customers.
<b>6</b>	<p>Fundamental characteristics of all products should be presented on the first page of the results screen, adopting appropriate graphic or hypertext solutions in order to facilitate visibility and comprehension.</p> <p>This information should refer both to price (for example, fixed or floating price; time of use or flat price...) and to other fundamental features (for example, main contractual terms, bundled services or products, origin of energy production...).</p> <p>Explanations of the different characteristics should be available as second-level information to help the customer understand his/her options.</p>
<b>7</b>	<p>CTs should offer additional information on listed offers, if customers wish to use that information to help choose the best offer for themselves.</p> <p>Where additional information based on subjective parameters is offered (for example, customers' reviews, the CT's own rating or a rating adopted from a third party, a value for money assessment...), the CT should clearly disclose the nature of the information, the parameter used and the origin of the underlying data, in order to favour customer awareness.</p>
<b>V</b>	<b>Correctness and Accuracy</b>
<b>8</b>	<p>Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.</p> <p>CTs should rectify without delay any incorrect information on published offers. In order to achieve this, they should provide a quick and effective procedure allowing any interested party to report incorrect information.</p>
<b>VI</b>	<b>User-friendliness</b>
<b>9</b>	<p>Customers should be allowed to introduce their consumption data in a simple and friendly manner. In addition, CTs should offer help through default consumption patterns or, preferably, a tool that calculates the approximate consumption, based on information available to the user.</p>
<b>VII</b>	<b>Accessibility</b>
<b>10</b>	<p>To ensure an inclusive service, at least one additional communication channel (other than the internet) for accessing a comparison should be provided free of charge or at minimal cost.</p> <p>Whenever possible, CTs should adapt to the continuing development of technological devices (smart phones, tablets, new gadgets...) in order to be accessible for customers in the widest variety of forms with the same level of accuracy.</p>
<b>11</b>	<p>Online comparison tools should be implemented in line with the Web Content Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.</p>



VIII	Customer empowerment
12	<p>CTs should offer navigation tools such as filtering or alternative ranking functionalities, based on fundamental features of listed products, helping customers to select the best offers for them. The default ranking should be based on price criteria.</p> <p>CTs should be transparent about the criteria on which navigation tools are based. Where navigation tools are based on subjective parameters, including users' ratings, CTs should clearly disclose the nature of the parameter and the origin of the underlying data, in order to favour customer awareness.</p>
13	<p>CT providers should consider how best to empower customers to use their service and make appropriate choices for their needs.</p> <p>Background information on market functioning, on market issues such as price developments, and links to useful independent sources of information may be provided to help customers.</p>
14	<p>CT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across CTs can help to enhance understanding.</p>
IX	Future developments
15	<p>CTs should be open to innovation in order to adapt and reflect the evolution of the current energy market: implementation of smart metering, electric vehicles, new pricing models and new business models (demand response, prosumer, aggregators...); thereby helping consumers to become active players in the energy market.</p>
16	<p>CTs should adapt to the development and deployment of smart meters, being able to process data from them and providing customers with a more accurate comparisons and analysis depending on their consumption habits and, in general, on the circumstances that may affect the results of the comparison.</p>





## **1 Introduction**

### **1.1 Context and previous work**

At the 3<sup>rd</sup> Citizens' Energy Forum in London in 2010, the European Commission presented an energy study exploring the benefits the liberalised energy market brings to customers in all 27 MSs. One of the key findings of the study was that many customers did not have access to neutral, objective information that empowers them to take an active role in liberalised energy markets by switching contracts or suppliers to obtain a better deal. In some cases, this information was provided, but customers had trouble finding it.

In July 2012, CEER published its Guidelines of Good Practice (GGP) on Price Comparison Tools, based on a set of 14 recommendations on how these tools can function effectively to the benefit of energy customers. The GGP-2012 cover multiple themes: independence of the tool, transparency, exhaustiveness, clarity and comprehensibility, correctness and accuracy, user-friendliness, accessibility and customer empowerment.

Since 2012, the issue of ensuring transparency and reliability of comparison tools (CTs), including those covering energy retail markets, has been further addressed at the European level. Studies on CTs and analysis of their functioning reveal that the level of services they offer is not fully satisfactory, which negatively impacts on customers' attitudes and confidence in their ability to take an advantage of using those tools.

### **1.2 Objective and scope**

CEER is aware that European energy customers need more and better information, empowering them to take a more active role in the liberalised energy markets, and that CTs can offer easier access to useful, reliable and usable information on available offers.

CEER is also aware that retail energy markets are evolving significantly due to different factors, including new opportunities offered by the spread of advanced technologies, such as smart meters and smart grids, or by the emergence of new ways to enable consumers to play an active role, such as collective switching schemes or demand response schemes. CEER desired to create a new version that would take into these developments in order to future proof this 2017 version of the GGP on CTs

These developments are already having an impact on how a well-functioning comparison tool should operate, and stronger impacts can be expected in the future.

Due to the fact that almost five years have elapsed since the publication of the GGP-2012, and considering the focus that the European Commission has put on comparison tools of late, CEER decided to investigate whether and how the existing recommendations could be enhanced in order to ensure that they still address, both at present and in the foreseeable future, the issues that energy consumers face when approaching and using CTs.

#### **1.2.1 Workshop and public consultation**



In order to provide a solid basis for the section on future challenges, CEER organised a closed workshop on 21 June 2016 to discuss this topic with experts from regulators, legislators, academics, private sector companies and consumer organisations.

Also, in November 2016, CEER launched a public consultation<sup>3</sup> in order to encourage all stakeholders to submit their vision and suggestions about two different topics:

- Do the CEER 2012 recommendations need to be updated and if so, how?
- What developments in different fields (technology, retail markets, etc.) may make further updating of the GGP on CTs necessary in the future?

The call for consultation responses closed on 16 January 2017 and CEER received 16 responses. The Evaluation of Responses document<sup>4</sup> summarises the issues/positions of the respondents and addresses each of the main issues.

In general, although nearly all respondents agreed that the principles of the CEER 2012 recommendations are still valid; some adjustments would be beneficial, given the evolution of the retail sector.

- Customers trust in CTs – Certification/verification appears to be a good way to ensure the reliability of private CTs, although in practice, regulation, verification or certification process should be defined at local level, depending on the local conditions.
- Market coverage – Most respondents indicated that the CTs should ideally present an exhaustive spectrum of available offers but that this would be very hard to obtain in practice. In any case, the majority of respondents agree that the priority is transparency on market coverage rather than exhaustiveness of the scope.
- Scope of comparison – Some consumer associations said that CTs should allow customers to compare their current contracts (even if their current contract is no longer available on the market) with active products; other respondents said that different methods could be used in order to obtain an accurate estimation of potential savings. Most considered that the actual focus issue should be transparency about how comparisons with the current contract are carried out.
- Product information – Most retailers and consumer representatives remarked that the CTs should offer information on additional products, services, taxes and other relevant contractual information (not only price). Information should anyway be focused on objective and verifiable elements in order to prevent customers being misled;
- Filtering and ranking criteria – Navigation tools should allow consumers to compare products for more than just price, and their functioning should not be based on subjective parameters;
- Accuracy – Comparing offers will become progressively more difficult due to their increasing complexity (time of use or dynamic price, bundled services, etc...) and some kind of simplified comparison should coexist with advanced and complex comparisons;
- Users' reviews – Some agents pointed out that subjective ratings might be useful, but should be subject to monitoring; some other agents highlighted the risk for CTs to become consumers' forums/blogs.

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<sup>3</sup> [Guidelines of Good Practice on Comparison Tools in the new Energy Market Design](#)

[A public consultation paper](#) in the Related Documents section.

<sup>4</sup> [Guidelines of Good Practice on Comparison Tools in the new Energy Market Design – Public Consultation Evaluation of Responses](#), 19 December 2017, Ref: C17-CEM-105-03.



- Customers' data – Most respondents agreed that data management should be standardised at national level, in order to include the specificities of the national markets. It could foster the creation of new CTs, and also may help consumers to use CTs more easily and accurately.
- New models – It should be a goal for CTs to take into account offers for prosumers, demand side response, etc. even though this seems difficult at present, in order to help customers to learn about the advantages and risks of these new initiatives. New models may allow customers to compare new initiatives with traditional energy offers and products with the same level of accuracy as the comparison among traditional products.

### 1.3 Regulatory framework

Different provisions in EU legislation cover aspects that can be related to the functioning of CTs. Horizontal legislation includes the Directives on Unfair Commercial Practices<sup>5</sup>, on Consumer Rights<sup>6</sup> and on E-Commerce<sup>7</sup>. In the energy sector, the Third Energy Package<sup>8</sup> Directives (with regard to transparency, billing and price information) and the Energy Efficiency Directive<sup>9</sup> (with regard to metering and consumption data) are relevant to the issue.

Compliance with the Unfair Commercial Practices Directive is addressed in the European Commission Key Principles for Comparison tools<sup>10</sup>.

Though the CEER GGP do not refer to legislation compliance or enforcement, many of the points covered by the Key principles and the CEER recommendations address the same issues and offer similar indications.

In November 2016, the “Clean Energy for All Europeans Package”<sup>11</sup> (Clean Energy package) was issued by the European Commission. In the proposed Electricity Directive<sup>12</sup>, it is mentioned that Member States (MSs) shall ensure that customers have access, free of charge, to at least one tool comparing the offers of suppliers that meets specific requirements.

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<sup>5</sup> [DIRECTIVE 2005/29/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation \(EC\) No 2006/2004 of the European Parliament and of the Council \('Unfair Commercial Practices Directive'\)](#).

<sup>6</sup> [DIRECTIVE 2011/83/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council.](#)

<sup>7</sup> [DIRECTIVE 2000/31/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market \(Directive on electronic commerce\).](#)

<sup>8</sup> <https://ec.europa.eu/energy/en/topics/markets-and-consumers/market-legislation>

<sup>9</sup> [DIRECTIVE 2012/27/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2012 on energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC.](#)

<sup>10</sup> [The Key Principles include in their scope all digital content and applications developed to be used by consumers to compare products and services, irrespective of the device used \(laptop, mobile devices, etc.\) or the parameters on which the comparison is based \(price, quality, user reviews, etc.\).](#)

<sup>11</sup> <https://ec.europa.eu/energy/en/news/commission-proposes-new-rules-consumer-centred-clean-energy-transition>

<sup>12</sup> [Proposals regarding the Directive on common rules for the internal market in electricity \(COM\(2016\) 864 final/2\) and its Annexes \(recast\).](#)



Consumers' confidence is enhanced when CTs are perceived as reliable, and the reliability of CTs can be enforced by a range of options. Whatever the route, it is important that CTs are independent from energy supply companies, that they are accurate and that they are – and are perceived as being – reliable for customers. Customers then need clear and comprehensive information, and CTs should help them understand and use this information.

These updated GGP, by definition, provide recommendations and present a list of best practices for MSs, national regulators and market players when designing well-functioning comparison tools, but are not intended to provide a base of minimum requirements for regulation on CT reliability.

## 2 Updated guidelines of good practice with accompanying discussion

In this chapter, we set out the final GGP for comparison tools. These final guidelines take into account views received during the closed workshop in June 2016 and the public consultation launched in November 2016. Not only were the 2012 guidelines updated, but also in order to future proof our GGP, CEER has added two new recommendations GGP that take into account smart metering, electric vehicles, prosumers and other recent developments.

These recommendations are addressed to MSs, NRAs, public bodies, customer/consumer organisations, CT providers and energy suppliers. NRAs should share these GGP with CTs providers and suppliers. Energy suppliers have a responsibility to work constructively with CT providers. For example, if there are many complex offers in the market, it will be difficult for the CT to present them in a clear way.

### 2.1 Independence of the tool

Guideline 1, as defined in 2012, already includes the key principles regarding impartiality of CTs: independence of energy suppliers and non-discrimination. These recommendations were not questioned by any respondent to the 2016 consultation.

Moreover, the proposed Clean Energy package covers the same principles, stating that CT shall be operationally independent and ensure that suppliers are given equal treatment in search results. Consequently, guideline 1 is basically unmodified.

#### **Updated Guideline 1:**

**A comparison tool (CT) must be independent of energy supply companies, giving the user a non-discriminatory overview of the market.**

**The provider of a comparison tool should show all information in a consistent way.**

Guideline 2, as defined in 2012, identified different ways for an NRA to ensure that a CT works well to protect and empower customers: where self-regulation is in place, the NRA or another public body should actively monitor the standards in place; where self-regulation is not enough, a voluntary accreditation scheme or mandatory regulation should be established; a public CT may also be established where no private CT exists or to complement commercial CTs.



European customers should have access to reliable comparison tools, whether operated by private companies or public authorities/bodies. Public and private CTs can and do coexist in the same market as they offer different services to customers. Moreover, competition in the comparison services market among different *reliable* CTs could benefit customers in offering a better service, tailored to different customer needs.

The most suitable way to promote CTs' reliability and to empower energy customers would be more efficiently defined – and updated if necessary – at local level, depending on both comparison market and energy-market maturity. A range of approaches to ensure the reliability of CTs is, in fact, possible, including those mentioned in the 2012 guideline 2.

Several participants in the 2016 public consultation offered suggestions about the role of NRAs and other public bodies, which agree with CEER's position. In particular, several respondents noted that a verification process would help consumers' confidence in CTs by setting strict rules of neutrality between CT operators and suppliers; one respondent added that such a scheme should at least be completed by a monitoring process. One actor considers that a public CT could serve as a reference to verify commercial CTs' results.

Former Guideline 12 stated that an NRA or a competent public body should consider ways to promote the public CT, where it exists, or make clear to customers which private CTs meet specific standards, where in place. This recommendation is still valid, and has been merged with the [current] guideline 2.

In conclusion, Guideline 2 has been clarified to better underline, beyond reference to any specific approach, that NRAs or competent public bodies should ensure the reliability of CTs, taking into account the maturity and competitiveness of the comparison market. The best solution to ensure the reliability of CTs, including the possible establishment of a public CT, should be chosen at national level.

#### **Updated Guideline 2:**

**Ensuring the reliability of CTs is crucial to protect and empower customers. The best way to achieve this goal can be efficiently defined at national level, taking into account the maturity and competitiveness of both the comparison market and the energy market, and could be implemented with the active role of NRAs or other competent public bodies.**

**NRAs or another public body may also decide to establish their own reliable CT service where no such private service exists or to complement commercial CTs, and consider ways to promote the service to customers.**

## **2.2 Transparency**

There was strong support for Guideline 3 in 2012: that CTs should disclose the way they operate. This information can help to build customer trust in the service and should be presented in a clear, understandable way. This recommendation was not questioned by any respondent to the 2016 consultation.

Consequently, Guideline 3 is only modified to clarify the necessity for CTs to identify advertisements and sponsored products, in accordance with the first EC Key principle for Comparison tools.



### **Updated Guideline 3:**

**CTs should disclose the way they operate, their funding and their owners/shareholders, in order to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers.**

**Advertisements and/or sponsored products should be clearly identified and separated from the comparison results.**

## **2.3 Exhaustiveness**

Guideline 4 as defined in 2012 required CTs, at least as an ideal outcome, to offer at the first step of the comparison results an exhaustive picture of all available energy prices and products that are relevant to the customer, and their costs; if complete coverage of the market is not possible, CTs were required to clearly state this before showing the results screen.

Covering all existing offers is to be considered a goal for all CTs, but this could be unrealistic in some cases, e.g. for offers that cannot be correctly managed by the calculation algorithm due to their pricing structure. Thus, the revised Guideline 4 focuses on ensuring transparency through disclosure of the market coverage as a priority, confirming at the same time that CTs' coverage of the market should, in any case, be as complete as practicable.

In terms of exhaustiveness, considering the prominent impact for customers of the first result of the comparison, the revised Guideline 4 requires that all prices and products covered by the CT and relevant for the customer, are initially shown. The purpose of this requirement is to ensure that navigation is handled by customers following their preferences, with no influence by any unnecessary filter (e.g. showing as a first step only "recommended" products, or only the "best deal").

### **Updated Guideline 4:**

**CTs' coverage of the market should be as complete as practicable. If the presented information does not offer a complete overview of the market, the CT should clearly state this before showing the results of the comparison as well as on the comparison results screen.**

**All prices and products covered by the CT and available to the customer on the basis of general selection criteria (e.g. the area where the supply is located, or a given customer segment) should be shown as a first step in the comparison results screen.**

## **2.4 Clarity and comprehensibility**

The 2012 Guideline 5 stated that the total cost of listed products should be presented on the primary results screen, including discounts, in a clear and comprehensible way, clearly indicating that the total cost is an estimation based on historic or estimated consumption.

This guideline has not been changed in essence, although some enhancements have been introduced.





On the one hand, the revised text offers a more-detailed recommendation regarding discounts, in order to enable customers to have a better understanding of the different nature of possible discounts. The revised text takes into consideration that customers should be aware that the total cost estimation may be influenced not only by the estimated consumption but also by different price nature and structure (e.g. floating price vs. fixed price; flat price vs. time-of-use price).

On the other hand, a clear disclosure of the methodology used for estimations is now requested not only with regards to total cost estimation, but also to the estimation of potential savings that might be obtained by switching to listed offers, where this information is provided, in order to prevent customers from creating unjustified expectations on their future spending opportunities.

#### **Updated Guideline 5:**

**Costs should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of the unit kWh-price. Any discounts should be clearly described, specifying when those discounts end; discounts which are subject to conditions or restrictions should be clearly separated from total cost estimation.**

**CTs should clearly indicate that prices shown as a total cost are an estimate, as they are based on historic or estimated consumption and on price information available at present. The same warning should be indicated where a CT offers an estimate of potential savings that might be obtained by switching to listed offers.**

**Access to additional information on cost details (e.g. unit prices, cost components...) and on the methodology used for costs or potential savings estimation should also be made available to customers.**

Guideline 6, as defined in 2012, stated that the fundamental characteristics of all products (e.g. fixed/floating price, regulated end-user price) should be presented on the results screen in a visible and comprehensible way.

Evolution in retail markets and a growing differentiation among available offers shows that not only price, but the combination among price, contractual conditions and additional products and services is essential for a consumer to assess the advantage that he/she can take from switching, and to make an informed decision whether to switch or not.

Guideline 6 has thus been revised in order to better reflect that evolution, including elements other than price among the fundamental characteristics that a CT should show in the initial results screen. In order to ensure that a customer can have a clear and comprehensible vision of multiple pieces of information, and can easily navigate the results, CTs are required to present the information through appropriate graphic solutions, and to offer access to additional explanations.

The revised Guideline does not specify which fundamental characteristics of products, other than price, should be highlighted by CTs, as a definition of such characteristics can be better defined at national level, according to the local situation and the maturity of the market.

#### **Updated Recommendation 6:**



**Fundamental characteristics of all products should be presented on the first page of the results screen, adopting appropriate graphic or hypertext solutions in order to facilitate visibility and comprehension.**

**This information should refer both to price (for example, fixed or floating price; time of use or flat price...) and to other fundamental features (for example, main contractual terms, bundled services or products, origin of energy production...).**

**Explanations of the different characteristics should be available as second-level information to help the customer understand his/her options.**

The 2012 Guideline 7 required CTs to provide additional second-level information on products and services in order to enable customers to choose the offers that best match their preferences.

The revised version of the guideline makes a distinction between information that is based on objective and verifiable data and subjective information, and includes a more-challenging transparency requirement for the latter, as that kind of information may lead to customers misunderstanding, or artificially influence their opinion and choice.

Subjective information could be of interest for customers, and is widely offered by CTs in other sectors; a clear distinction between facts and opinions should, in any case, be offered to customers in order to prevent misleading information or misinterpretation.

#### **Updated Guideline 7:**

**CTs should offer additional information on listed offers, if the customer wishes to use that information to help choose the best offer for themselves.**

**Where additional information based on subjective parameters is offered (for example, customers' reviews, the CT own rating or a rating adopted from a third party, a value for money assessment...), the CT should clearly disclose the nature of the information, the parameter used and the origin of the underlying data, in order to favour customer awareness.**

## **2.5 Correctness and Accuracy**

The 2012 Guideline 8 stated that price information used in the comparison should be updated as often as necessary in order to correctly reflect prices available on the market.

In addition to this, considering that quickly removing incorrect information that might be published in error, despite all necessary precautions, is essential in order to ensure CTs' reliability and customer confidence, the revised guideline includes a new requirement: It requests that incorrect information is rectified without delay, and that to this aim CTs should provide a procedure allowing third parties to effectively report incorrect information.

#### **Updated Guideline 8:**

**Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.**

**CTs should rectify without delay any incorrect information on published offers. In order to achieve this, they should provide a quick and effective procedure allowing any interested party to report incorrect information.**





## 2.6 User-friendliness

Ideally, customers should input their actual consumption to receive the best results for their needs. It can be helpful to provide customers with a choice of what information to load into a CT.

This recommendation recognises that knowing one's energy consumption is important in selecting the right offer; however, customers may not know what their energy consumption currently is or where to find that information.

In addition, some new energy products, such as 'Time of Use Tariffs', may require detailed information on consumption profiles to provide a better comparison. In order to not discourage customers from using CTs, they should be allowed to introduce their sets of data to obtain a comparison on a simple and friendly manner.

The energy bill is the most general source of information available to use in CTs, but technology can also offer the customers standard and easy ways to access their consumption profile and to upload it to the CT. The public consultation paper<sup>13</sup> describes two interesting initiatives: the use of QR codes in UK, and the use of the Green Button in USA. Those effective solutions, or any other way of standard access to smart meters data could foster the use of CTs and help customers to provide more accurate comparisons.

Having that in mind, the same principle reflected in GGP-2012 is still valid: if customers do not have access to information on consumption, or do not understand it, standardised consumption profiles can be helpful. Suppliers also have a role in making sure consumption information is clear on a customer's bill.

### **Updated Recommendation 9:**

**Customers should be allowed to introduce their consumption data in a simple and friendly manner. In addition, CTs should offer help through default consumption patterns or, preferably, a tool that calculates the approximate consumption, based on information available to the user.**

## 2.7 Accessibility

There are customers who do not have access to the internet or are not confident using the internet for price comparisons. CTs that do not provide information through additional channels exclude such customers. Thus, the principle of the 2012 guideline regarding additional communication channels (other than internet), free of charge or at minimal cost, is still valid.

The progress of the internet since the last GGP were published in 2012 has been huge, resulting in a whole new range of tools (e.g. apps) and gadgets that have changed the way people interact with the internet. As a result, internet is more and more present in our daily lives through an increasing variety of forms, and not only via a computer.

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<sup>13</sup> Please see point 4 of Public Consultation Paper <https://www.ceer.eu/documents/104400/-/-/b5f82a8a-c10d-0315-6e89-1d92543fcde1>



This is why in the revision of the guidelines CT are encouraged also to provide their service on all new forms of internet access through different devices whenever possible. This way, the accessibility for customers will increase while maintaining the same level of accuracy.

**Updated Guideline 10:**

**To ensure an inclusive service at least one additional communication channel (other than the internet) for accessing a comparison should be provided free of charge or at minimal cost.**

**Whenever possible, CT should adapt to the continuing development of technological devices (smart phones, tablets, new gadgets...) in order to be accessible for customers in the widest variety of forms with the same level of accuracy.**

Web Content Accessibility Guidelines covers a wide range of recommendations for making web content more accessible to a wider range of people with disabilities, including blindness, low vision, deafness or hearing loss.

The guideline on avoiding barriers based on Web Content Accessibility Guidelines (WCAG)<sup>14</sup> is still valid without changes.

**Updated Recommendation 11:**

**Online comparison tools should be implemented in line with the Web Content Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison.**

## **2.8 Customer Empowerment**

Guideline 12, as defined in 2012, has been merged into the scope of the revised Guideline 2.

Considering that easy-to-use and non-discriminatory navigation tools, such as filtering or alternative ranking functionalities, play a key role in helping customers to understand and select the best offers in the face of an increasing variety of different products, the new text of Guideline 12 deals specifically with navigation functionality issues.

Navigation tools should be objective and consider fundamental features of listed products; where alternative ranking of the result list is offered, the default ranking should be based on price criteria because this is what customers tend to expect from a comparison tool.

As the use of navigation tools that include subjective parameters may lead to customer misunderstandings, or artificially influence their opinion, specific information is requested in order to promote customer awareness in the use of such tools.

**Updated Guideline 12:**

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<sup>14</sup> <https://www.w3.org/WAI/intro/wcag>



**CTs should offer navigation tools such as filtering or alternative ranking functionalities, based on fundamental features of listed products, helping customers to select the best offers for them. The default ranking should be based on price criteria.**

**CTs should be transparent about the criteria on which navigation tools are based. Where navigation tools are based on subjective parameters, including users' ratings, CTs should clearly disclose the nature of the parameter and the origin of the underlying data, in order to favour customer awareness.**

Most responses to the 2016 consultation reflect the opinion that no additional recommendations are needed in order to improve customer involvement, activation and trust. Guideline 13 as defined in 2012 remains valid but, even so, it has been added to in order to take into account a suggestion about the addition of links to sources of information regarding offers. This would facilitate, if relevant, the verification process, and could reinforce customers' trust in CTs by providing a verification regarding the source of the information presented.

**Updated Guideline 13:**

**CT providers should consider how best to empower customers to use their service and make appropriate choices for their needs.**

**Background information on market functioning, on market issues such as price developments and links to useful independent sources of information may be provided to help customers.**

Across the CTs, all information should be written and presented in a clear way to aid understanding. Using consistent or standardised terms and language within and across CTs can help to avoid customer confusion.

**Updated Guideline 14:**

**CT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across CTs can help to enhance understanding.**

## **2.9 Future developments**

The changes in energy markets, especially in retail energy markets, since GGP were published in 2012 have been intense, and the evolution in the next few years is expected to be even more challenging. Therefore, CTs will need a continuous development and evolution as new technologies such as smart metering and time-of-use tariffs are increasingly being offered to customers.

**Guideline 15 (new):**

**CTs should be open to innovation in order to adapt and reflect the evolution of the current energy market: implementation of smart metering, electricity vehicles, new pricing models and new business models (demand response, prosumer, aggregators...); thereby helping consumers to become active players in the energy market.**



Going further, new developments in the electricity sector are expected to change the way customers engage with the energy sector. For example, smart meters and smart grids could provide a wide variety of possibilities and tools, both for the customer and for the network.

Customers with fully-functional smart meters installed may be able to interact with the electricity network, for example, receiving price information on their actual consumption, or information about the load requirements of the grid. This information could be used to adapt their consumption patterns to the state of the grid by taking advantage of the opportunities that may arise, such as participation on Demand Side Response through an aggregator.

That is why CTs should be designed with smart meters in mind, being able to receive and process data from them and providing customers with more-accurate comparisons and analyses depending on their consumption habits and, of course, the general circumstances that may affect the results of the comparison.

**Guideline 16 (new):**

**CTs should adapt to the development and deployment of smart meters, being able to process data from them and providing customers with more-accurate comparisons and analyses, depending on their consumption habits and on the general circumstances that may affect the results of the comparison.**

In any case, and as is reflected on Guideline 15, CTs need to be able to evolve as the energy sector does, by adapting and offering new options to customers<sup>15</sup>, helping them to discover those changes and, in the end, ensuring that they operate to empower customer choice by being a useful tool for them.

It is also a CEER objective to maintain a role in promoting empowerment and ensuring sufficient protection for customers.

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<sup>15</sup> To see some examples of new customers options, please see point 4.4 of Public Consultation Paper <https://www.ceer.eu/documents/104400/-/-/b5f82a8a-c10d-0315-6e89-1d92543fcd1>



## Annex 1 – List of abbreviations

Term	Definition
CEER	Council of European Energy Regulators
CEM TF	Customer Empowerment Task Force
EC	European Commission
EU	European Union
GGP	Guidelines of Good Practice
NRA	National Regulatory Authority
CT	Comparison tool
CRM WG	Customer and Retail Market Working Group
RMF TF	Retail Market Functioning Task Force
WCAG	Web Content Accessibility Guidelines
MS	Member State

## Annex 2 – CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. CEER's members and observers (from 36 European countries) are the statutory bodies responsible for energy regulation at national level.

One of CEER's key objectives is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest. CEER actively promotes an investment-friendly and harmonised regulatory environment, and consistent application of existing EU legislation. Moreover, CEER champions consumer issues in our belief that a competitive and secure EU single energy market is not a goal in itself, but should deliver benefits for energy consumers.

CEER, based in Brussels, deals with a broad range of energy issues including retail markets and consumers; distribution networks; smart grids; flexibility; sustainability; and international cooperation. European energy regulators are committed to a holistic approach to energy regulation in Europe. Through CEER, NRAs cooperate and develop common position papers, advice and forward-thinking recommendations to improve the electricity and gas markets for the benefit of consumers and businesses.



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More information at [www.ceer.eu](http://www.ceer.eu).