Electricity and Gas Retail market design, with a focus on supplier switching and billing

Guidelines of Good Practice

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INFORMATION PAGE

Abstract

This document (C11-RMF-39-03) is a CEER document on Retail market design, with a focus on supplier switching, moving and billing.

Building on regulators' work to date, these guidelines address the roles and responsibilities of market actors in the European electricity and gas markets, including the DSOs' role as neutral market facilitators. The work will also be used to further develop regulators' collective thinking on Europe's retail market design.

Target Audience

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

Related Documents

CEER/ERGEG documents

- GGP on Regulatory Aspects of Smart Metering for Electricity and Gas, ERGEG, February 2011, Ref. E10-RMF-29-05, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab2/E10-RMF-29-05_GGP_SM_8-Feb-2011.pdf
- GGP on Indicators for Retail Market Monitoring for Electricity and Gas, ERGEG, October 2010, Ref. E10-RMF-27-03, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab1/E10-RMF-27-03_final%20GGP%20IRMM_12-Oct-2010.pdf
- Status Review of the Implementation of EC Good Practice Guidance for Billing, ERGEG, September 2010, Ref. E10-CEM-36-03, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab1/E10-CEM-36-03_EC%20billing%20guidance_8-Sept-2010.pdf
- GGP on Customer Complaint Handling, Reporting and Classification, ERGEG, June 2010, Ref. E10-CEM-33-05, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Guidelines%20of%20Good%20Practice/Other/E10-CEM-33-05_GGP-ComplaintHandling_10-Jun-2010.pdf
- Status Review of DSO Unbundling with Reference to GGP on Functional and Informational Unbundling for DSOs, ERGEG, September 2009, Ref. E09-URB-20-05, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Cross-Sectoral/2009/C09-URB-20-05_DSO-Unbunling_09-Sep-09.pdf
- GGP and Status Review - Obstacles to Supplier Switching in the Electricity Retail Market, ERGEG, April 2008, Ref. E07-RMF-06-03, http://www.energy-

regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/2008/E07-RMF-06-03_switching%20electricity%20GGP%20status%20review_10.pdf

- GGP and Status Review - Obstacles to switching in the gas retail market, ERGEG, April 2007, Ref. E06-CSW-05-03, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/2007/E06-CSW-05-03_SwitchingToGRM_final.pdf
- Supplier Switching Process – Best Practice Proposition, ERGEG, July 2006, Ref. E05-CFG-03-05, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/2006/E05-CFG-03-05.pdf

External documents

- Directive 2009/72/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC, http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0055:0093:EN:PDF
- Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in gas and repealing Directive 2003/54/EC, http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0094:0136:EN:PDF
- EURELECTRIC Reference 'Retail Market Model': Bringing the Benefits of Competitive Electricity Markets to the Customer, 2007, http://www.eurelectric.org/Download/Download.aspx?DocumentID=22565
- EURELECTRIC Customer-centric retail markets: A future-proof market design,. 2011: http://www2.eurelectric.org/content/default.asp?PageID=1082

Table of Contents

EXECUTIVE SUMMARY 5

TABLE 1 –RECOMMENDATIONS 7

1 INTRODUCTION 8

1.1 Scope 9

1.2 Methodology 10

2 RECOMMENDATIONS 11

2.1 Retail market design 11

2.1.1 Recommendations on the retail market model 12

2.1.2 Recommendation on meter value management 14

2.2 Information 15

2.2.1 Recommendation on information on offers 15

2.2.2 Recommendation on the contract 15

2.2.3 Recommendation on information about calculating the costs of energy consumption 15

2.3 Supplier switching 17

2.3.1 Recommendations on the timing of a supplier switch 17

2.3.2 Recommendation on stopping a switch 19

2.4 Billing Process Model 21

2.4.1 Recommendation on billing regime 21

2.4.2 Recommendation on final bill 22

2.4.3 Recommendation on payment methods 22

2.4.4 Recommendation on regulated billing frequency 23

3 CONCLUSIONS 25

ANNEX 1 – CEER 27

ANNEX 2 – LIST OF ABBREVIATIONS 28

ANNEX 3 – GLOSSARY OF TERMS 29

ANNEX 4– TEN POINTS OF GOOD PRACTICE GUIDANCE FOR BILLING PUBLISHED BY THE EUROPEAN COMMISSION IN 2009 30

Table 1 – Recommendations 7

Figure 1 - Key components when designing a retail market model 11

EXECUTIVE SUMMARY

These Guidelines of Good Practice (GGP) address the roles and responsibilities of market actors in the European electricity and gas retail markets. While competition and consumer protection issues are central, the GGP also gives guidance on the DSOs' role as neutral market facilitator. The work is intended to complement the handbook on market design developed by the EC's working group as presented on the 3rd Citizens' Energy Forum in 2010. These Guidelines of Good Practice of retail market design were the subject of a public consultation and the input of 57 stakeholders was incorporated.[1]

The GGP will feed into CEER's further work and analysis of retail market design, which best meets customer[2] needs.

CEER believes that, in order to reach a harmonised European energy market, there needs to be a step by step approach to putting into practice the necessary policies.

This document is written with a customer and forward-looking perspective. In order for customers to become active in the energy market, basic information of the markets' functionality and customers' rights must be available and easy to understand. The interface to the customer should be easy and intuitive for customers; a customer needs to be enabled to contact the relevant market actor depending on his/her request. Especially suppliers[3] need to provide transparent, comprehensive and easy to understand information to customers and deal with enquiries and complaints promptly and efficiently. This document proposes that comparable price information is best achieved by communicating all tariffs as a unit price.

CEER recommends that the general market model should be supplier-centric, with the supplier being the main - but not only - contact to the customer. This initial choice then guides the design of the processes that enable market actors to act on the energy markets. CEER recognises that demand response and smart grid[4] developments may lead to a different, more sophisticated approach for those customers that are active in for example micro generation. However, there is no reason for the processes surrounding smart grids and demand response not to be supplier-centric.

CEER recognises that a retail market model consists of a number of different processes. Here, CEER has chosen to focus on two of them: supplier switching and billing. These are the most relevant processes, as they imply the most frequent customer interaction with the energy market. If these processes are well-designed and functioning well, the customer can engage in the energy market in a positive way, with the result to build customer trust and greater customer engagement. There are also huge benefits for the suppliers, DSOs and metering operators in having processes that enable efficient and reliable day to day business activities.

[1] See accompanying Evaluation of Responses document (C11-RMF-39-03a)
[2] For the definition of customer, please see Annex 3 – Glossary of Terms
[3] For the definition of supplier, please see Annex 3 – Glossary of Terms
[4] For the definition of smart grid, please see Annex 3 – Glossary of Terms

CEER finds that a mandatory combined billing regime performed by the supplier is the most appropriate approach for the billing process, since the supplier is the market actor acting in the competitive layer of the retail market.

CEER highlights, as in previous documents, that competition in retail markets will evolve with the existence of a fair and non-discriminating framework. This includes a regulated and binding framework for electronic data exchange with a minimum set of information, including data formats, processes and timeframes, as well as the abolition of regulated end-user-prices.

CEER recognises that these recommendations might lead to changes in national setups. When updating IT systems and if smart meters are introduced, CEER finds that it is important to keep the customer perspective in mind with respect to designing these changes. CEER underlines, as also repeatedly expressed by stakeholders in the public consultation, that costs and benefits of redesigning retail markets, whether by implementing new processes, empowering customers or the installation of new hard- and software, should be assessed thoroughly.

These GGP contain thirteen recommendations: three recommendations on retail market design; three recommendations on information; three recommendations on switching; and four recommendations on billing.

All thirteen recommendations are presented in the table below:

Reference	Number	Recommendation
Retail market design	1	As an overall principle, the supplier should be the main point of contact for the customer.
	2	The supplier should always be the first point of contact for questions regarding switching, billing and moving in or moving out.
	3	There should be a regulated framework for meter value management; this means a standardised data format, timetables for data exchange and a minimum set of information.
Information	4	The supplier should give complete information on the offers in a clear and concise manner. Comparability should be ensured, by presenting all costs as a projected unit price[5].
	5	The customer should always receive a contract in a durable medium.

[5] For the definition of projected unit price, please see Annex 3 – Glossary of Terms

	6	The customer should be clearly informed in the offer, the contract and on the bill about the methodology used to calculate the costs of energy consumption.
Switching	7	A switch should be executed as quickly as possible. This could be as quickly as within 24 hours and in any case within three weeks.
	8	A supplier switch should be possible any day of the week
	9	No market actor should be able to stop an initiated switch except for limited cases foreseen in the regulatory framework.
Billing	10	Combined billing, to be provided by the supplier, should be mandatory.
	11	The final bill should be received by the customer as soon as possible. This could be as quickly as within two weeks and in any case within six weeks.
	12	The customer should be offered at least two different payment methods, which are easily accessible and at least one of them should be free of charge.
	13	The customer should have a choice of a minimum set of different billing and payment frequencies, including the possibility of a monthly frequency.

Table 1 –Recommendations

1 Introduction

A well-functioning retail market is an essential element in liberalised energy markets. It links wholesale markets to customers and should provide a choice of commercial offers at fair and transparent prices, a satisfactory quality of service and should also enable innovative services.

A well-functioning retail market requires low barriers for new entrants and a free choice of a sufficient number of suppliers for customers across all Member States. The existence of artificially low regulated end-user-prices will hinder the development of competition.

The active participation of customers requires customer confidence and trust. This can be achieved if there are clear and reliable rules in place and access to information is easy to obtain for the customer. Moreover, it is important to ensure the privacy and security of customer data when market actors carry out processes and meter value management in the energy market. Empowered customers are as essential as competitive suppliers for the development of competition in energy retail markets. Having efficient retail markets in place will foster the energy efficiency and the use of renewable sources.

Energy retail markets encompass a set of collaborative processes. The definition of "market design" in this report is the following:

> *"Clearly defined roles and responsibilities of different market actors, the processes between them and the framework for empowering customers"*

Efficient market design, including a level playing field and a customer-friendly approach, is an important contributor for bringing the benefits of competition to the customer. The existing European legislation is not extensive with regard to retail market design and necessary elements of retail markets. However, one single internal energy market is impossible to attain without a common understanding of well-functioning retail markets.

The 3rd Citizens' Energy Forum in 2010 examined results of the DG Energy Retail Market Design Working Group which was set up by the European Commission. The Working Group report[6] identified key elements of retail markets that should serve as a guide for further work. The Forum invited CEER to work on additional recommendations and guidance to complete this handbook. CEER therefore developed a draft GGP on Retail market design with a focus on supplier switching and billing. CEER presented preliminary results of the public consultation at the 4th Citizens' Energy Forum 2011. The Forum then invited CEER to continue its work and to present the final GGP at the 5th Citizens' Energy Forum.

[6] Retail Market Design, report from the EC Working Group for the 3rd Citizens Energy Forum, http://ec.europa.eu/energy/gas_electricity/forum_citizen_energy_en.htm

The social importance of energy as an essential or critical service for households places particular responsibilities on suppliers and DSOs, especially with regard to the supply of vulnerable customers and also related to energy savings and sustainable energy use. In general terms, vulnerable customer groups should primarily be addressed through national social policy frameworks but in some respects can also be supported by energy policy, for example, by facilitating their access to and understanding of energy services and ensuring that they are not adversely affected by market practices.

Retail market design defines the common rules and procedures that all market actors have to follow in order to operate in the market. Roles and responsibilities of the different market actors, business processes between them and corresponding data exchange should provide a level playing field, be binding in nature and streamlined to efficiency. Furthermore, customer empowerment and well-functioning retail markets require that adequate market regulation is also in place. It is important to ensure that the regulation empowers and protects the customer without creating unjustified barriers for market entry. Legal barriers for market entry and engagement, e.g. conditions of possible supplier licences, should be analysed carefully and with respect to the unhindered development of competition. That being said, the question of supplier licences is not within the scope of this report.

From a wide range of necessary processes in retail markets, there are two particular processes where the customer has frequent and direct contact with the market actors of the energy markets: billing and supplier switching. Therefore, the focus of the recommendations in this report is on these processes.

CEER and ERGEG have previously worked on retail market design, in particular principles concerning supplier switching and billing. This report is a continuation and further development of this work, taking into account previously agreed upon principles.[7] This GGP will also feed into CEER's future work and analysis of retail market design.

1.1 Scope

The purpose of these Guidelines of Good Practice on retail market design, with a focus on supplier switching and billing for both electricity and gas is to illustrate a market model including important interfaces among the market actors. In addition to the detailed guidelines on supplier switching and billing processes, this report also provides guidance on aspects related to providing information to the customer.

[7] In its previous work, ERGEG listed a number of general principles for electricity and gas that should be taken into account when considering supplier switching and billing.
- "GGP and Status Review – Obstacles to Switching in the Gas Retail Market";
- "Obstacles to Supplier Switching in the Electricity Retail Market – Guidelines of Good Practice and Status Review";
- "Final GGP on Indicators for Retail Market Monitoring";
- "GGP on Regulatory Aspects of Smart Metering for Electricity and Gas";
- "Supplier Switching Process – Best Practice Proposition"; and
- "Status Review Supplier Switching Process Electricity and Gas markets - Five case studies".

This document is directed towards Member States, national regulators and market actors when designing and acting in national electricity and gas retail markets.

Where this report refers to 'customers' they are to be understood as 'household customers' and those customers that are deemed to be protected by Annex 1 (and Article 3) of the 2009 Electricity and Gas Directives[8], when implementing the 3rd Package. Each individual Member State may in addition choose to enlarge the scope from only household customers to also include small and medium-sized businesses. The national definition should be used when applying the recommendations.

In addition to the recommendations, this GGP also includes key results of a CEER internal questionnaire to the national regulatory authorities[9] (NRAs) on the models of their national retail markets. The complete results can be found in the document C11-RMF-39-03a.

CEER would like to underline that the recommendations in this GGP are in some cases an outlook towards the future of energy retail markets and beyond the obligations imposed by the present European legislation and the framework suggested by the European Commission's DG Energy Retail Market Design Working Group. CEER is aware that the implementation of these recommendations requires efforts to enhance communication among market actors.

CEER will continue to work on optimising the design of retail markets to the benefit of customers.

1.2 Methodology

CEER held an open workshop with stakeholders to receive input for the draft GGP in February 2011. The draft GGP was open to public consultation from July to September 2011 and the outcome of the consultation has been processed according to CEER public consultation procedures including a hearing with respondents. This document presents CEER's final GGP. CEER presented preliminary outcomes of the public consultation and the draft recommendations at the 4th Citizens' Energy Forum in 2011. CEER intends to present the final GGP at the 5th Citizens' Energy Forum in 2012. CEER intends to continue working on retail market design in 2012, including work on meter value management in a smart metering environment.

[8] Directive 2009/72/EC and Directive 2009/73/EC
[9] For the definition of national regulatory authority, please see Annex 3 – Glossary of Terms

2 Recommendations

2.1 Retail market design

The main characteristic describing the structure of the retail market is the retail market model: the focus should be on how the customer engages with the different market actors in each process. The interaction between the market actors is also of key importance.

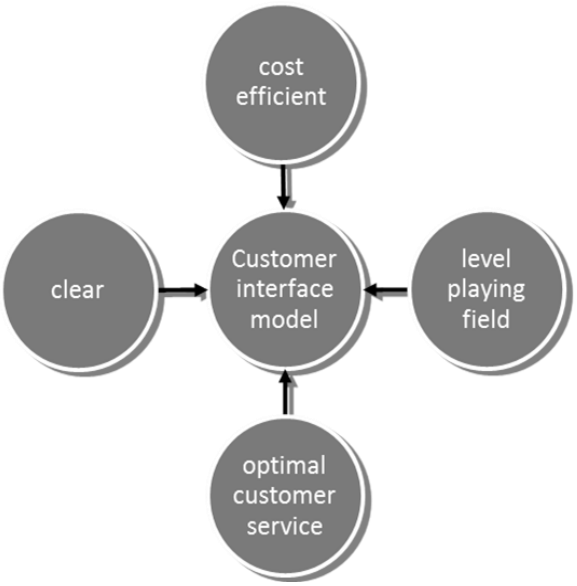

Figure 1 - Key components when designing a retail market model

CEER recommends that the four objectives listed below should be considered when designing the customer interface and processes in energy markets. These objectives should be taken into account in the chosen retail market model in a balanced way, as shown in figure 1. The objectives are therefore not mentioned in a prioritised order.

(a) **The retail market model should be intuitively comprehensible for the customer.** The customer should understand without great effort which market actor he/she should be in contact with whenever he/she has questions related to electricity or gas. This requires that the roles and responsibilities of each market actor towards customers are well-defined and customers are properly informed about them.

(b) **The retail market model should enable optimal customer service.** This means that there should be several easy ways/channels to reach the relevant market actor and the request/question should be dealt with without delay. The customer should have easy access to customer service and get answers correctly and as quickly as possible.[10]

[10] This recommendation is also mentioned in the ERGEG GGP on customer complaint handling, reporting and classification, June 2010, Ref. E10-CEM-33-05

(c) **The retail market model should provide a level playing field to ensure competitive retail energy markets.** It is important to ensure that the chosen interface model does not give any structural advantages to any market actor and thus hinders competition.

(d) **The retail market model should ensure cost efficiency.** When designing a retail market model, the costs of each process within this model should be considered.

2.1.1 Recommendations on the retail market model

11 out of 22 respondent countries to an internal survey by CEER have indicated that their current market model is a model with the supplier as the main point of contact. 9 countries have a dual point-of-contact model and 2 countries have a one point-of-contact model when a customer has a contract with an incumbent supplier and a dual point-of-contact model for customers who have switched supplier.

When developing retail market models, it should be remembered that the basic structure of open electricity and gas markets is that suppliers, independent metering operators and ESCOs are acting under competitive circumstances, whereas the DSO is operating as a monopoly. Thus, the market actors and the DSO have different kinds of roles and responsibilities. Unbundling rules[11] foster this separation by requiring vertically-integrated DSOs to develop their own communication and branding which differs from the communication and branding of the supply branch of the vertically-integrated undertaking. These measures are to be respected in order to create a level playing field among energy suppliers and to ensure sound development of the retail market.

CEER finds that a supplier-centric model is preferable, since it is crucial that participating in the energy market is as easy as possible for customers. Since the supplier acts on the competitive part of the retail market, the supplier would be the relevant actor at this level. Suppliers will need to find ways to keep their existing customers and to gain new customers. There are a wide range of opportunities for the supplier to do so, for example through developing products and defining competitive contracts which are appealing to the customer. Moreover, given the expected developments with respect to smart metering and automated processes, it is important to ensure that processes are intuitively comprehensible to customers. Since the supplier is the market actor with whom customers usually have the most contact, the supplier would be the most intuitive market actor to contact for a customer.

Nonetheless, the roles and responsibilities of other market actors should be clear to customers, since, in the absence of a strict one point-of-contact model, it is important for the customer to know which market actor to contact in what situation. Also, it is crucial for the customer to be able to contact other relevant market actors directly.

CEER finds that in order to have a successful supplier centric model, it is important that the information exchange among market actors is appropriate and well-functioning.

[11] Article 26(3) in Directive 2009/72/EC and Article 26(3) in Directive 2009/73/EC

CEER believes that the customer interface must be defined at each process, in order to exercise the flexibility offered by the supplier centric model. In the supplier centric model, the supplier is the standard interface. However, in the following processes another market actor could be the customer interface: when the customer needs a new connection, has interruption problems, and for questions with respect to the network connection or about the grid. Then, the DSO and/or the metering operator would be the relevant market actor for a customer to contact.

Nevertheless, it is expected that with the increased interaction of customers and grids as anticipated in the smart grids concept a review of the existing contact models in Europe, in particular with regard to the role of the DSO, might be necessary. Demand response and smart grid developments may lead to a different, more sophisticated approach for those customers that are active in for example micro generation. However, there is no reason for the processes surrounding smart grids and demand response not to be supplier-centric. Also, new developments with respect to smart metering may mean that new market actors such as metering operators or ESCOs emerge. CEER finds that these developments are not hindered by the supplier-centric model since these processes are outside of the regulated framework.

CEER considers that the customer should be clearly informed about which market actor must be contacted for solving specific issues. The appointed single point of contact[12] should provide information on and the contact details of the relevant market actor responsible for those issues. Also, the supplier should be well-informed about which market actor is responsible for specific issues for each customer.

Recommendation 1: As an overall principle, the supplier should be the main point of contact for the customer.

In the supplier centric model, the supplier should be the main point of contact for the customer regarding the majority of the processes in the energy market, including the switching process, the process of moving in or moving out, and for questions about billing. CEER believes that providing the customer with one main point of contact is convenient and service-oriented to the customer, especially as the energy market gets more complex and the customer has multiple parties to deal with.

In addition to the supplier generally being the main point of contact for the customer, CEER finds that in the processes that require the most interaction between the customer and the energy retail market, the supplier should be the first point of contact for the customer. CEER finds that it is most intuitive for the customer to contact the supplier when there are questions about billing, moving or switching supplier. The supplier as first point of contact is then responsible for redirecting the customer to the relevant market actor if the supplier cannot deal with the question.

Recommendation 2: The supplier[13] should always be the first point of contact for questions regarding switching, billing and moving in or moving out.

[12] Article 3(12) in Directive 2009/72/EC and Article 3 (9) in Directive 2009/73/EC
[13] This could be the old, new or current supplier, depending on the process.

2.1.2 Recommendation on meter value management[14]

14 respondent countries that answered the internal survey currently have a regulated framework for meter value management in place. 2 countries do not currently have a regulated framework for meter value management.

Well-defined processes for meter value management within the binding regulatory framework are of essential importance to obtain well-functioning processes. These processes include switching, billing, moving, etc[15]. The data exchange should be in a standardised electronic format between market actors, in order to obtain automatic, cost-efficient, timely and reliable data exchange. The regulation of the data exchange should therefore cover at least data formats, timetables and the minimum set of information. CEER encourages the use of European standards[16] when applicable to enable interoperability. It should be guaranteed that an incumbent market actor does not have any advantage compared to other market actors.

Regardless of the meter value management process, full transparency of metering data is the principle. It is always the customer that chooses in which way metering data shall be used and by whom, with the exception of metering data required to fulfil regulated duties and within the national market model. The principle should be that the party requesting information shall state what information is needed, with what frequency and will then obtain the customer's approval for this.[17]

Recommendation 3: There should be a regulated framework for meter value management; this means a standardised data format, timetables for data exchange and a minimum set of information.

[14] For the definition of meter value management, please see Annex 3 – Glossary of Terms
[15] Such as for instance connection and disconnection.
[16] For the definition of standards, please see Annex 3 – Glossary of Terms
[17] E10-RMF-29-05 Recommendation 1.

2.2 Information

2.2.1 Recommendation on information on offers

Offering transparent and comparable price and product information, which enables the customer to compare offers, lies in the hands of the suppliers. Notwithstanding suppliers' possibilities to differentiate themselves by being innovative and competitive in their offers, customers need to receive clear, concise and comparable information on offers to be able to easily determine which offer is most appropriate. To make the information comparable for the customer, the supplier should calculate a unit price based on projected or standard consumption. This means that all costs with regard to the offer, including fixed costs and taxes, are translated into a unit price.[18] For instance, for a three-year fixed contract with a one-time rebate of 200 Euros, the costs and deductions over the three-year period would be divided equally per year. This goes for all types of offers, whether through the internet, telephone or on paper. In addition, the information on the offer should be complete.

Recommendation 4: The supplier should give complete information on the offers in a clear and concise manner. Comparability should be ensured, by presenting all costs as a projected unit price.

2.2.2 Recommendation on the contract

According to the 3rd Package[19], the customer should have the right to a contract that specifies the key elements in the contract. Also, according to article 5 of the Directive on distance contracts[20] the customer is always entitled to a written confirmation of information on a contract concluded at a distance, including a regret period. However, CEER believes that the customer would benefit from receiving the actual contract with its terms and conditions including clear and concise information on the switching date and the prices applying. The contract can be sent in paper form, but also in an electronic format that is a durable medium; e.g. a pdf-file. CEER finds that this does not hinder contracting being done electronically, e.g. through the internet, or orally, e.g. through the telephone or in person.

Recommendation 5: The customer should always receive a contract in a durable medium.

2.2.3 Recommendation on information about calculating the costs of energy consumption

Costs of energy consumption are calculated by energy suppliers according to a certain methodology. In many cases, the customer lacks information on this methodology and

[18] In Sweden for example, all stakeholders that market products to household-customers must present the costs of the product as a unit price. This is also true for suppliers so that all costs related to the product/offer must be transparent. So the supplier will present the unit price per kWh for the offer with the following components: energy price, any fixed yearly costs (excluding network tariffs) and the most expensive billing payment option. This makes it easy for the customers to choose and compare offers from different suppliers.
[19] See Annex I, article 1(a).
[20] Directive 97/7/EC on The protection of consumers in respect of distance contracts.

therefore does not understand how costs relate to their consumption. Furthermore, some customers opt for non-standard products, where there is a special need for further explanation in order to enhance customers' trust. CEER finds that the customer should be made fully aware of the method used by the supplier to calculate the cost of energy consumption as well as the methodology for non-standard product designs.

CEER recognises that the information must be easy to understand and easy to access. There needs to be a balance between the display of necessary information on methodology and complexity. CEER considers it reasonable for this information to be given with the offer, the contract and on the bill although recognising that each channel allows for different degrees of detail. It is feasible to provide additional information e.g. through websites, although the needs of vulnerable customers need to be met.

Components for information on the methodology of calculating energy costs could be e.g. historical consumption, standard consumption, price indexation, current unit price, any service package discount and current account balance.

Recommendation 6: The customer should be clearly informed in the offer, the contract and on the bill about the methodology used to calculate the costs of energy consumption.

2.3 Supplier switching

By 2007 at the latest, the electricity and gas markets in all EU Member States had to be opened up to competition and all customers have had the possibility to switch supplier in both electricity and gas markets. A well-functioning market needs well-informed, active and empowered customers who are in a position to switch supplier in an uncomplicated, protected and risk-free way. It is important that the markets are organised in such a way that customers have easily accessible information about suppliers and their offers. It is also important that the actual switch is simple to carry out for both for customers and all market actors involved.

CEER defines a switch as the action through which the customer acts and changes his/her supplier. The meter point associated with a household must be re-registered with a new supplier. A customer moving residence should only be recorded as a switch if the customer switches supplier.[21]

Below, CEER presents three recommendations on supplier switching.

2.3.1 Recommendations on the timing of a supplier switch

Looking at the current situation, CEER notes that two countries[22] have a switching period of around one week and five countries[23] have a switching period of around two weeks. Out of these countries, only one[24] has smart metering in place. Seven countries have a switching period of around one month; in 6 countries, a switch takes place in one to two months.

The 3rd Package states that a switch should take place within three weeks for both electricity and gas customers. [25] In recommendation 3, CEER underlines the importance of a regulated framework for meter value management. With faster, easier and cheaper communication between the relevant market actors and appropriate settlement rules, CEER is of the opinion that a supplier switch should be possible within less than three weeks. This timeframe starts when the new supplier sends the correct data of the switch to the DSO. CEER refers to this as an “initiated switch”. CEER believes that it is important that timeframes for a switch do not differ between electricity and gas, in order not to complicate dual fuel switches.

[21] E10-RMF-27-03
[22] Ireland and Norway
[23] Finland, France, Portugal, Spain and Sweden
[24] Sweden
[25] See chapter II Article 3(5) a) of Directive 2009/72/EC and chapter II Article 3 (6) a) of Directive 2009/73/EC

From a customer perspective, there are numerous benefits to a shorter switching period. Firstly, a short switching period facilitates the customer's ability to switch quickly and take advantage of a good temporary offer with for instance a low price. A shorter switching period also decreases the barriers for switching, thereby increasing customer participation. Processes which enable increased customer mobility will lead to suppliers becoming more competitive, for instance by competing on good customer service. Good customer service leads to positive customer experiences of activity in the energy market and therefore increases customers' trust.

CEER finds that with the aforementioned prerequisites in place, it should be possible to switch on the same day once the supplier has sent the correct data to the DSO, as some stakeholders have also put forward in the public consultation. CEER therefore recommends that if rolling out smart meters, a forward-looking approach would strive toward a same-day switch in the long run. Bearing this in mind, regulators should keep the timeframe under review.

Concerning the timeframe between the customer signing a contract and the new supplier sending the correct data of the switch to the DSO, it is important that the new supplier sends the switching request to the DSO as soon as possible respecting the customer´s wishes. If the distance selling law is applicable and the customer has a regret period, it might be feasible for the new supplier to respect the regret period before initiating the switch, if the balancing system does not offer other alternatives.

Recommendation 7: A switch should be executed as quickly as possible. This could be as quickly as within 24 hours and in any case within three weeks.

In some European countries[26], it is possible to switch supplier any day of the week. CEER is of the opinion that a switch can take place any day of the week in all Member States. While CEER recognises that smart metering by itself is not the solution for having well-functioning switching processes, it can be seen as a step in further facilitating and speeding up the data transfer between all relevant market actors, therefore making the date of the switch more flexible. Market actors will review their communication systems if smart meters are in place.

From the customer's point of view, the possibility to execute a switch any day of the week shortens the time necessary to switch suppliers, therefore facilitating switching as described before. Moreover, market competitiveness and efficiency is enhanced when the number of occasions when a switch can take place is not restricted to certain days of the month. Therefore, the switching process should not be delayed due to the fact that the switch can only take place on a specific day of the week or month. CEER emphasises that for a customer to take advantage of temporary offers, it is important that not only the switching period be as short as possible, but that it should also be possible to switch any day of the week. Therefore, the switching date should be as flexible as possible, adapting to the customer's wish on when the switch should take place. It is important to keep in mind that ultimately it should be up to the customer to choose the date of the switch e.g. when the old contract expires.

[26] For instance, in Norway it is possible to switch any day of the week.

While sustaining this general principle, CEER recognises that if a technical intervention is needed at the customer's home, this switch may in practice not be possible any day of the week. Even without the necessity of technical interventions restrictions from labour law or other requirements might be in place and lead to the fact that switching is not possible to execute any day of the week.

Recommendation 8: A switch should be possible any day of the week.

2.3.2 Recommendation on stopping a switch

Currently, in 9 of the respondent countries to CEER's internal survey it is not possible for any market actor to stop a switch. In 8 countries, it is possible for the DSO or the old supplier to stop a switch.

The DSO as a neutral market facilitator should carry out the switch without delay or discrimination. If the DSO is not able to carry out the switch because of lacking/wrong data, the DSO could technically reject the message, and thus prevent the switch process from being initiated, depending on the legal framework, However, CEER believes that the DSO should, as a neutral market facilitator, speed up the process of achieving or correcting data and thus assist the wishes of the customer.

There should be clearly defined rules on the information needed to be able to switch; see recommendation 3. This would mean that if the new supplier sends incomplete or incorrect data to the DSO, the DSO can reject the request. In such a case, a switch is not initiated. When setting up rules on minimum information requirements, two aspects need to be taken into account. On the one hand, it is important that it is as convenient and easy as possible for a customer to switch; hence, the information requirements should not pose too heavy a burden for the customer to comply with. On the other hand, in order to prevent unwanted switches, certain information needs to be required. CEER considers that this could for instance name, address, organisation (VAT) number, meter value and metering point identification number. In order to raise customers' awareness about their contractual commitments, CEER is of the opinion that the customer should be informed about possible consequences if a switch is initiated while there is e.g. still a valid contract with the old supplier which could be done in the offer. To avoid any case of abuse or that customers are switched by mistake, the supplier should confirm that the switch is going to take place and a new contract exists.

Switching is the most powerful tool a customer has to exert his/her influence in the energy market. Therefore, CEER finds that the customer's will to switch should be respected by all market actors. When this possibility is hampered, customer trust in the energy market is undermined. This also undermines customers' willingness to engage in the energy market again. This means that the number of reasons for limiting this possibility for the customer to act on their own behalf should be very limited.

As an overall principle, CEER is of the opinion that there should be no/minimal possibilities to stop an initiated switch. Regarding the case of violation of contract terms or debts, CEER's opinion is that any dispute between customer and supplier should be processed within the legal framework of contractual law, and therefore should not constitute a valid reason to stop an initiated switch.

However, CEER recognises that differences in legislation among Member States may result in different practices regarding the possibilities to stop an initiated switch. In such cases, CEER thinks that Member States should define with care the exemptions for when and by which market actor(s) it should be possible to stop an initiated switch. These very limited cases must be within the regulatory framework.

Recommendation 9: No market actor should be able to stop an initiated switch except for limited cases foreseen in the regulatory framework.

2.4 Billing Process Model

The bill is one of the main tools to inform consumers about their energy usage and cost.

In 2009, the European Commission together with stakeholders worked on Good Practice Guidance for Billing. This Guidance[27] sets out recommendations for customer-friendly energy bills, both in terms of the information provided and the form of communication and design/layout of the bills themselves. In 2010, ERGEG published a Status Review on the implementation of the EC Good Practice Guidance for Billing[28] to depict the situation within ERGEG member and observer countries. The Status Review did not constitute ERGEG's opinion of the EC Good Practice Guidance for Billing, neither an assessment of this Guidance. It exclusively dealt with a description of the present situation in the ERGEG member and observer countries regarding billing requirements and voluntary measures and the changes that were already in progress or decided.

CEER believes that the DSO, as a neutral market facilitator, should give all suppliers access to the same information on their customers' data with regard to billing. It should be guaranteed that the incumbent supplier does not have any advantage due to for example combined computer systems.

In the following section, CEER presents four recommendations on how billing should be performed.

2.4.1 Recommendation on billing regime

Looking at the current situation, a majority of the countries surveyed have a mandatory combined billing regime.

As stated in recommendations 1 and 2, CEER believes that processes in the retail market should be supplier-centric. This approach would facilitate customer activity in the retail market. Since the supplier acts on the competitive market and thus has incentives to be proactive in customer relations, the natural point of contact should be the supplier.

CEER believes that customers would benefit from receiving a single combined bill from one market actor, the supplier, containing both supply and network charges.

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[27] Representatives from two NRAs participated, together with other stakeholders, in the working group set up by the European Commission's Directorate General for Health and Customers (DG SANCO) to draft the EC Guidance. However, the EC Guidance for Good Practice on Billing, which was notapproved by ERGEG, cannot be considered as an ERGEG position. The paper can be found at the following link: http://ec.europa.eu/energy/gas_electricity/doc/forum_citizen_energy/2009_09_29_citizens_energy_forum_reports_and_materials.zip

[28] September 2010, Ref. E10-CEM-36-03, http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Customers/Tab1/E10-CEM-36-03_EC%20billing%20guidance_8-Sept-2010.pdf

It is important that the regulatory framework provides clear provisions on how the costs for DSO services billed by the supplier are dealt with. This is especially the case for the spread of financial risk between DSOs and suppliers when facing a non-paying customer.

Recommendation 10: Combined billing, to be provided by the supplier, should be mandatory.

2.4.2 Recommendation on final bill

Currently, 3 countries[29] already have a regulation on giving the customer a final bill within around one month. Another 5 countries[30] have a timeframe of six weeks.

By final bill, CEER means the last bill the customer receives from the supplier after making a switch or moving. According to the 3rd Package, the customer should have received a final closure account no later than six weeks after the change of supplier has taken place.[31]

CEER finds that with smart metering and appropriate IT systems facilitating data transfer together with a regulated meter value management framework, the billing process will become easier for the supplier. CEER therefore believes that it should be possible to send the final bill within two weeks, as was also indicated by stakeholders in the public consultation.

Furthermore, CEER believes that it should be in the interest of all market actors to have the shortest possible time period for the termination of the relationship between the customer and the previous supplier concerning the final bill. CEER acknowledges that smart metering systems are likely to speed up the communication between the relevant market actors, and thus contribute to achieve a shorter time period for this process. While CEER recognises this fact, CEER wants to emphasise that smart metering systems are not a prerequisite to obtain a shorter period than six weeks for issuing of the final bill.

Recommendation 11: The final bill should be received by the customer as soon as possible. This could be as quickly as within two weeks and in any case within six weeks.

2.4.3 Recommendation on payment methods

By payment method, CEER means the medium through which a payment is carried out, i.e. electronic payment, direct debit, etc.

[29] Czech Republic, France, Hungary
[30] Austria, Belgium, Denmark, Germany and Sweden
[31] Paragraph 1 (j) in Annex I of Directive 2009/72/EC and Directive 2009/73/EC

CEER recognises that payment methods are a way for suppliers to differentiate their products. Nevertheless, CEER considers it important that customers have a choice among payment methods. According to the 3rd Package, customers should be offered a wide choice of payment methods which do not unduly discriminate among customers.[32]

For CEER, a wide choice of payment methods means two at a minimum. In order to avoid unduly discriminating among customers, the payment methods should be easily accessible. Highly automated payment methods such as direct debit or electronic bills imply little or no cost. CEER therefore finds that at least one of the payment methods should be free of charge. Any additional payment methods could be cost reflective but feasible for the customer at a low charge.

The supplier should provide flexibility in payment methods to meet the needs of vulnerable customers, which can differ from those of others. It is important that suppliers offer individual support to these customers to make the payment methods easily accessible.

Recommendation 12: The customer should be offered at least two different payment methods, which are easily accessible and at least one of them should be free of charge.

2.4.4 Recommendation on regulated billing frequency

It should be possible for the customer to choose among a minimum set of different billing and payment frequencies as part of their contract or product. As already stated in previous reports, CEER underlines that when talking about "bills", they should be based on actual consumption.

On the one hand, the billing frequency is an important means for suppliers to differentiate their commercial offers and there is a need for freedom for suppliers to innovate.

On the other hand, the customer should be able to rely on a minimum standard of choice concerning billing and payment frequencies.

Nevertheless, CEER believes that the number of billing frequencies could be limited to a reasonable number and that there could be a cost-reflective surcharge for non-default billing frequencies.

CEER underlines that it is important that customers are properly informed about the possible fluctuation in costs depending on which billing and paying frequency is chosen.

Although it is important that the customer has a choice in the frequency for billing and payment in order to boost awareness of energy consumption and costs, with the introduction of smart metering, CEER believes that it should be possible for the supplier to offer a more flexible billing and payment frequency and thus give the customer many options. The

[32] 1(d) Annex I

shortest reasonable period for billing and payment frequency seems to be one month even with the deployment of smart meters. CEER recognises that with the deployment of smart meters the information on actual consumption and costs could be provided on a frequent basis through other means than the bill.

Recommendation 13: The customer should have a choice of a minimum set of different billing and payment frequencies, including the possibility of a monthly frequency.

3 Conclusions

This document lists thirteen recommendations as Guidelines of Good Practice on Retail Market Design. There are two particular processes where the customer has frequent and direct contact with the market actors of the energy markets. Therefore, the recommendations developed in this report focus on supplier switching and billing. It is of the utmost importance to develop a retail market design that helps customers to engage actively in the market by making both the switching process and the billing regime as easy and transparent as possible.

All processes and roles in the market have to be clearly defined in advance to ensure that processes run smoothly and simply from the customer's perspective. The preferred market model is a supplier-centric model meaning that the supplier should be the first point of contact. Only high level technical questions and specific network problems should be dealt with in contacts between the customer and the DSO. Roles and responsibilities of the different market actors, business processes between them and the corresponding data exchange should provide a level-playing-field, be binding in nature and streamlined to efficiency.

For the customer, it is easier if there is only one initial point of contact to turn to when there is any issue or question. Therefore the market model should be supplier centric with the supplier being the main - but not only - point of contact. At the same time the roles and responsibilities of other market actors should be clear to customers and it should be possible for the customer to contact them directly.

The customer should be well informed. This concerns how and when a switch is carried out but also information on the bill. The supplier should be the first point of contact in case of questions or problems concerning supplier switching, moving or billing.

The switch itself should work as quickly and smoothly as possible. While the customers' wish for a fast and non-complicated switch to a new supplier has to be taken into account, there need to be adequate safeguards, for example respecting the regret period and informing the customer about possible contract breaches with the old supplier.

CEER finds that a mandatory combined billing regime performed by the supplier is the most appropriate approach for the billing process, since the supplier is the market actor acting in the competitive layer of the retail market. The mandatory combined billing model is also in line with the supplier centric model recommended by CEER.

The thirteen recommendations can be summarised as follows:

Reference	Number	Recommendation
Retail market design	1	As an overall principle, the supplier should be the main point of contact for the customer.
	2	The supplier should always be the first point of contact for questions regarding switching, billing and moving in or moving out.

	3	There should be a regulated framework for meter value management; this means a standardised data format, timetables for data exchange and a minimum set of information.
Information	4	The supplier should give complete information on the offers in a clear and concise manner. Comparability should be ensured, by presenting all costs as a projected unit price.
	5	The customer should always receive a contract in a durable medium.
	6	The customer should be clearly informed in the offer, the contract and on the bill about the methodology used to calculate the costs of energy consumption.
Switching	7	A switch should be executed as quickly as possible. This could be as quickly as within 24 hours and in any case within three weeks.
	8	A supplier switch should be possible any day of the week
	9	No market actor should be able to stop an initiated switch except for limited cases foreseen in the regulatory framework.
Billing	10	Combined billing, to be provided by the supplier, should be mandatory.
	11	The final bill should be received by the customer as soon as possible. This could be as quickly as within two weeks and in any case within six weeks.
	12	The customer should be offered at least two different payment methods, which are easily accessible and at least one of them should be free of charge.
	13	The customer should have a choice of a minimum set of different billing and payment frequencies, including the possibility of a monthly frequency.

Annex 1 – 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. Through CEER, a not-for-profit association, the national regulators cooperate and exchange best practice. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest.

CEER works closely with (and supports) the Agency for the Cooperation of Energy Regulators (ACER). ACER, which has its seat in Ljubljana, is an EU Agency with its own staff and resources. CEER, based in Brussels, deals with many complementary (and not overlapping) issues to ACER's work such as international issues, smart grids, sustainability and customer issues.

The work of CEER is structured according to a number of working groups and task forces, composed of staff members of the national energy regulatory authorities, and supported by the CEER Secretariat.

This report was prepared by the Retail Market Functioning Task Force of the Retail Market and Customers Working Group.

Annex 2 – List of abbreviations

Term	Definition
ACER	Agency for the Co-operation of Energy Regulators
CEER	Council of European Energy Regulators
DG ENER	Directorate-General for Energy (European Commission)
DG SANCO	Directorate-General for Health and Consumers (European Commission)
DSO	Distribution System Operator
EC	European Commission
ERGEG	European Regulators Group for Electricity and Gas
ESCO	Energy Service Company
EU	European Union
GGP	Guidelines of Good Practice
MVM	Meter Value Management
NRA	National Regulatory Authority
RMC WG	Retail Market and Customer Working Group
RMF TF	Retail Market Functioning Task Force
WG	Working Group

Annex 3 – Glossary of Terms

The descriptions of terms listed here serve to provide a common understanding of the different subjects and apply in the first instance to the issues addressed in this document. Beyond that, for any other issue of general importance or of common understanding, the definitions in the existing legal framework, including the 3rd Package and Regulation (EC) 1228/2003, apply. Some differences with definitions already in use in other situations and/or specifications are possible.

General terms

Customer Where this report refers to customers they are to be understood as household customers and those customers that are deemed to be encompassed by Annex I of the 2009 Electricity Directive when implementing the 3rd Package.

Meter value management: Meter value management concerns the collection, treatment and use of the data provided by utility meters.[33]

National regulatory authority (NRA): Independent body responsible for the definition of framework (market rules), for setting up of system charges (tariffs), monitoring of the functioning and performance of energy markets and undertaking any necessary measures to ensure effective and efficient markets, non-discriminative treatment of all actors and transparency and involvement of all affected market actors.

Projected unit price: Costs of energy consumption translated into a price per kWh or m^3

Smart grids (electricity): Electricity network that can intelligently integrate the actions of all users connected to it – generators, customers and those that do both – in order to efficiently deliver sustainable, economic and secure electricity supplies. Smart grids employ innovative products and services together with intelligent monitoring, control, communication, and self-healing technologies.

Standards: Voluntary technical specifications and common technical rules for products or systems to be placed on the market.

Supplier: Has a contractual agreement with end customer relating to the supply of electricity**.**

[33]Status Review on Regulatory Aspects of Smart Metering (Electricity and Gas) as of May 2009 E09-RMF-17-03, 19 October 2009

Annex 4 – Ten points of Good Practice Guidance for Billing published by the European Commission in 2009

1. Bills must be accurate, transparent, readable, thus easily understandable. The bill is the primary means by which consumers obtain information on their consumption and on the price they pay. It is, indeed, an important tool which helps consumers to manage their consumption and, if possible, consumer less.

2. Bills should allow consumers to compare offers and serve as a basis for deciding to switch supplier when appropriate.

3. Consumers should be free to exercise choice in their billing and payment service (frequency, detail, method of delivery). Nevertheless, a guaranteed minimum quality of billing information is needed. In accordance with national legislation, specific provisions should be made for consumers with particular disabilities. The Working Group recognises as good practice to put in place alternative arrangements for them such as having bills available in Braille.

4. All bills should contain information about payment modalities. Where payment of a first bill is overdue, subsequent bills for the same period should contain information about procedures for dealing with payment difficulties and encouraging consumers to make contact with their supplier. Finally, providers should put in place procedures to establish the circumstances of non-payment of bills.

5. Competition and innovation could improve the design of bills. Although suppliers remain free to determine the design of bills, the WG agrees that certain good practices across Europe improve bills to the benefit of consumers. Colour and the use of boxes/frames can help consumers understand bills.

6. Primary information should be the information which is essential for consumers to understand the price they pay for the service they receive. It should be displayed prominently on the bill. Consumers will benefit from information on their electricity and gas supply which is simple, easy to read and facilitates comparison with other suppliers, other users or other consumption periods. Such data could be presented in a "Comparability Box" that should feature prominently in their bill. Secondary billing information, with details about the bill, should also be included in the bill or reach consumers in an additional document.

7. Energy stakeholders (national administrations, regulators, industry and consumer associations) are invited to put in place consumer awareness raising activities such as information campaigns and education tools and involve advice bodies, such as Consumer Ombudsmen. These campaigns should aim to improve consumer understanding of energy bills. Energy consumers could also make use of online price calculators administered by objective third parties or independently verified.

8. Diverse traditions and legal requirements, together with different levels of household energy market development in EU countries, have led the WG to propose a number of options for the implementation of the billing recommendations at the national level. These options include the signature of a Code of Conduct, the possibility of a bill validation process or enactment of new billing legislation.

9. The WG recognises that there needs to be a competent authority in the EU Member States able to lead the billing review process at the national level. The WG invites EU Member States to define the body responsible for this activity.

10. National administrations, regulators, industry, consumer associations and other specialist groups are urged to work co-operatively fostering dialogue and partnerships to ensure the full implementation of these recommendations on the ground.

Annex 5 – ERGEG GGP on Regulatory Aspects of Smart Metering for Electricity and Gas, February 2011, Ref. E-10-RMF-29-05

ELECTRICITY AND GAS	
Data security & integrity	E/G 1. Customer control of metering data
ELECTRICITY	
Customer services	E 2. Information on actual consumption and cost, on a monthly basis, free of charge
	E 3. Access to information on consumption and cost data on customer demand
	E 4. Easier to switch supplier, move or change contract
	E 5. Bills based on actual consumption
	E 6. Offers reflecting actual consumption patterns
	E 7. Remote power capacity reduction/increase
	E 8. Remote activation and de-activation of supply
	E 9. All customers should be equipped with a metering device capable of measuring consumption and injection
	E 10. Alert in case of non-notified interruption
	E 11. Alert in case of exceptional energy consumption
	E 12. Interface with the home
	E 13. Software to be upgraded remotely
Costs and benefits	E 14. When making a cost benefit analysis, an extensive value chain should be used
Roll-out	E 15. All customers should benefit from smart metering
	E 16. No discrimination when rolling out smart meters
GAS	
Customer services	G 2. Information on actual consumption and cost, on a monthly basis, free of charge
	G 3. Access to information on consumption and cost data on customer demand
	G 4. Easier to switch supplier, move or change contract
	G 5. Bills based on actual consumption
	G 6. Offers reflecting actual consumption patterns
	G 8. Remote enabling of activation and remote de-activation of supply
	G 11. Alert in case of exceptional energy consumption
	G 12. Interface with the home
	G 13. Software to be upgraded remotely
Costs and benefits	G 14. When making a cost benefit analysis, an extensive value chain should be used
Roll-out	G 15. All customers should benefit from smart metering
	G 16. No discrimination when rolling out smart meters

Table 1: ERGEG's guidelines of good practice on regulatory aspects of smart metering