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CEER Report on Billing Issues in the Clean Energy for All Europeans Package

Customer Empowerment Work Stream

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INFORMATION PAGE

Abstract

This report presents an overview of the current European legislation regarding billing and billing information. It provides a summary of the status quo and case studies by regulatory authorities and/or Member States implementing those rules. Finally, the report opens a discussion on future issues related to changing markets/technologies and new information flows.

Target Audience

NRAs, European Commission, European Parliament, Member States, gas/electricity consumers, consumer representative groups, consumer protection authorities, energy suppliers, traders, electricity customers, electricity industry, academics and other interested parties.

Keywords

Bill, Billing information, Legal requirements, clean energy package, consumer protection, B2C, business to consumer contact.

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Related Documents

CEER Documents

- [CEER BEUC 2030 Vision for Energy Consumers: LET'S ASPIRE!](#), October 2020
- [ACER-CEER Market Monitoring Report 2019 – Energy Retail and Consumer Protection Volume](#), October 2020
- [CEER Recommendations on Dynamic Price Implementation](#), March 2020
- [CEER Monitoring Report on the Performance of European Retail Markets in 2018](#), November 2019
- [Implementing Consumer Rights in the Clean Energy for All Europeans Package](#), August 2019
- [Implementing Technology that Benefits Consumers in the Clean Energy for All Europeans Package](#), July 2019
- [CEER Key Positions on the “New Deal for Consumers”, on the Proposed Directive on Better Enforcement and Modernisation of EU Consumer Protection Rules](#), October 2018
- [CEER report on Smart Technology Development](#), June 2018
- [CEER Roadmap to 2025 Well-Functioning Retail Energy Markets](#), February 2018
- [CEER Guidelines of Good Practice on Comparison Tools in the New Energy Market Design - Updated Recommendations](#), December 2017
- [CEER Guidelines of Good Practice on electricity and gas retail market design, with a focus on switching and billing](#), January 2012
- [CEER Guidance for Billing, Implementation of EC Good Practice - ERGEG Status Review](#), September 2010

External Documents

- [Directive \(EU\) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU](#)
- [Clean energy for all Europeans package](#)
- [The European Union's Third Energy Package](#)

EXECUTIVE SUMMARY

This report focuses on changes to billing and billing information for electricity customers introduced by the Clean Energy Package (CEP) and the recast Directive 2019/944 on common rules for the internal market for electricity (recast Electricity Directive). In particular, the report looks at where rules were updated to strengthen the consumer's position and participation by amending information provided by the supplier, especially as regards switching. The report provides a short overview of the changes introduced by the recast Electricity Directive in terms of billing and moves on to highlight some case studies showing practical examples related to the rules set by the EU legislation. It draws further conclusions and recommendations regarding the challenges around the increased amount of information the consumer is presented with and has to process and understand. The report highlights key points of the CEP implementation including:

- the idea of prioritisation and reduction in order to achieve a truly consumer-friendly bill;
- the new “switching package” information which may increase consumer awareness and decrease practical barriers to switching suppliers; and
- the need to develop new, innovative concepts for billing.

Finally, the report initiates a discussion focusing on upcoming issues related to new developments and the new legislation, such as readability and comprehension of bills and billing information which may lead to future challenges (e.g., e-bills, misleading practices, reducing and prioritising information). To ensure that the consumer benefits from new legislation and technological developments, it is important to ensure that the relevant billing information is accessible and available in a proper manner. Increasing complexity and amount of information should not overload the consumer. Experience from all stakeholders may help to prioritise and reduce relevant billing information in order to improve guidance to the consumer.

1 Introduction

The recast Directive 2019/944 on common rules for the internal market for electricity (recast Electricity Directive) of the Clean Energy Package (CEP) was published on 14 June 2019. One of its focuses for consumers is on billing and billing information in electricity supply contracts [Art. 18 and Annex I of the recast Directive (2019/944)]. The rules were updated to strengthen the position and participation of consumers in the energy market, by amending what information the electricity supplier provides. All Member States must adopt the legislation into national law by the end of 2020. Parallel revisions are expected for EU gas legislation in the next few years.

This paper shares some billing practices and consumer information issues in detail and builds upon existing CEER publications¹. The paper also looks forward to future possible issues and further digitalisation.

The first chapter provides a short overview of the changes the recast Electricity Directive introduces regarding billing and contractual issues. The second chapter lists the amendments of the billing rules in detail and provides some case studies showing practical examples of existing national legislation/regulation.

The report includes an outlook focusing on possible new issues related to the new EU legislation. The final section deals with the consequences of the new legislation on readability and ease of comprehension of bills and billing information by the consumer. Two considerations may be helpful to improve consumers' understanding: *Prioritisation* and *Reduction*. Nevertheless, such techniques may have challenges and – if not done correctly – may confuse the consumer; this is also briefly discussed in the last chapter. A possible way forward for reconciling the importance of providing consumers with information whilst not overwhelming them may lie in the use of electronic media (e.g., apps, web portals) to provide a more dynamic and interactive bill. Thinking outside the box may prove fruitful here, as the rules of the CEP are not restrictive when it comes to the format of the bill. However, new billing concepts must not discriminate against consumers with lower digital literacy.

¹ [CEER Guidance for Billing, Implementation of EC Good Practice - ERGEG Status Review, September 2010;](#)
[CEER Guidelines of Good Practice - Electricity and Gas Retail market design, with a focus on supplier switching and billing, January 2012](#)

2 “New” CEP legislation focusing on billing (information)

ACER and CEER publish an annual report on the results of monitoring the internal electricity and natural gas markets.² The 2019 report highlights the information made available to consumers across Europe. It found that many of the new billing and billing information requirements in the CEP have already been introduced at national level in some Member States. Therefore, in the countries where national requirements already meet the CEP requirements this new legislation should not entail major changes for consumers.

This chapter summarises the billing and contractual information requirements set by the Clean Energy Package in Art. 18 and Annex I of the recast Directive (2019/944) on common rules for the internal market of electricity.

Art. 18 of the recast Electricity Directive is divided into 4 parts (a detailed overview is available in Annex 2):

- Paragraphs 1 to 3 define the overall billing process and the principles to be implemented by EU Member States. For example, it states that Member States shall ensure that final customers receive all their bills and billing information free of charge; that final customers are offered the option of electronic bills and billing information; and are offered flexible arrangements for the actual payment of the bills.
- Paragraph 4 stipulates that if the contract provides for a future change of the product or price, or a discount, this shall be indicated on the bill together with the date on which the change takes place.
- Paragraph 5 establishes the obligation for Member States to consult consumer organisations regarding changes to the requirements for the content of bills.
- Paragraph 6 stipulates that Member States shall ensure that bills and billing information fulfil the minimum requirements set out in Annex I of the Directive.

Annex I of the recast Electricity Directive sets minimum requirements on bills and billing information. It is divided into 5 parts:

- Paragraph 1 stipulates the minimum information to be contained on the bill and in the billing information, such as the key information to be displayed distinctly from the other parts of the bill. It distinguishes the cases where bills are based on actual consumption or on remote reading by the operator and defines the information that shall be made available to final customers.
- Paragraph 2 sets the frequency of billing and the provision of billing information. It distinguishes the cases:
 - where the final customer does not have a meter that allows remote reading by the operator, or where the final customer has actively chosen to disable remote reading in accordance with national law;
 - where the final customer has a meter that allows remote reading by the operator.
- Paragraph 3 focuses on the breakdown of the final customer’s price and the three components: energy/supply, networks and taxes/levies;

² [ACER-CEER Market Monitoring Report \(MMR\) – Energy Retail and Consumer Protection Volume 2019](#), October 2020

- Paragraph 4 establishes consumers' right to access complementary information on historical consumption and access to these data;
- Paragraph 5 focuses on the obligation to disclose energy sources, in terms of the overall energy mix as well as the environmental impact, and the obligation to use guarantees of origin for electricity from renewable sources.

3 Electricity Bill – purpose

The electricity bill is an obvious means for suppliers and distribution system operators (DSOs) to engage with their customers. Recital 48 of the Electricity Directive states: “Electricity bills are an important means by which final customers are informed”. They are first and foremost a way to communicate charges and what is owed when, but they may also be a tool used to raise awareness of consumers on topics such as their climate footprint or the sources of the energy they are consuming.

The CEP acknowledges three main purposes of the electricity bill. It states that bills and billing information should prominently display a limited amount of important information that enables consumers to:

- regulate their consumption
- compare offers
- switch suppliers

Indeed, electricity bills are not merely a demand for payment, they serve many different purposes. What makes them special is the fact that some of the items on an electricity bill are mandated by the respective Member States (MS) (and respective EU Directives) and not necessarily in the direct interest of the company issuing the bill. Electricity suppliers for instance now have to provide information on the benefits of switching and a link or reference to where price comparison tools (PCTs) can be found. This can be done in different ways; however, its purpose is to promote competition to the benefit of consumers.

The implementation of the CEP and its provisions for future electricity bills come at a time of transition to a more digitalised world. Bundled products, dynamic contracts and other new services will likely change the way consumers consider energy products and challenge the way electricity bills are designed and delivered in the future. Bills also offer a potential way for suppliers to distinguish themselves from other suppliers, for instance by providing a user-friendly bill.

The recast Electricity Directive sets requirements for electricity bills, attempting to cover different market specifics, such as different billing systems (annual bills with periodic instalments, or monthly billing according to actual consumption) or the status of the smart meter roll-out and its use. It does not specifically touch upon the topic of combined or separate billing, deeming the provisions to be applicable for supplier and DSO bills.

Table 1 below shows an overview of the CEP rules on billing (Annex I, recast Electricity Directive).

	Billing	Billing information	Consumption data
Basic required content	<ul style="list-style-type: none"> • The price to pay • A breakdown of price • When the payment is due • Consumption data of billing period • Contact details of supplier • Tariff name • Unique identification code for supply point • Availability and benefits of switching • Link to PCT • Contact details of alternative dispute resolution (ADR) body • Contact details of single point of contact • Contribution of each energy source to the electricity purchased (product level disclosure) • Contribution of each energy source to the supplier's overall energy mix for the previous year • Information on the environmental impact, in at least terms of CO2 emissions and radioactive waste, resulting from electricity produced by the supplier's overall energy mix for the previous year 	<ul style="list-style-type: none"> • Almost same information as on the bill • Other frequency 	<ul style="list-style-type: none"> • Available historical consumption is made available, at the customer's request, to a supplier or service provider they indicate • Covers data for the 3 previous years as a minimum or since the start of the supply contract • Detailed data according to time of use for any day, week, month and year, which is made available to the final customer without undue delay via internet or the meter interface, covering the period of at least the previous 24 months or the period since the start of supply contract
Specific requirements for bills based on actual consumption or remote reading	<ul style="list-style-type: none"> • Comparison of current and past year's consumption in graphic form • Contact information for consumer organisations, energy agencies, etc. for info on energy efficiency improvements • comparisons with final customer in the same user category 	---	<ul style="list-style-type: none"> • Easy access to complementary information on historical consumption allowing detailed self-checks
Frequency	At least once a year	<p>If no remote reading, accurate billing info 2 x/year or 4x/year if electronic billing or requested</p> <p>If remote reading, minimum of monthly billing info, can be done via internet</p>	Monthly/online if meter allows remote reading

Table 1: Billing and billing information requirements in recast Electricity Directive 2019/944

3.1 Structure and content of electricity bills

The electricity bill is packed with information, some of it in great detail, which in some cases may make it harder to comprehend and to separate what is absolutely necessary to know (e.g. costs and consumption data, when payment is due, payment modalities), from what may be important or merely interesting to know (which of course may vary from person to person).

The 2009 3rd Energy Package³ already prescribed a set of items that should be communicated on the electricity bill. The 2019 Clean Energy Package adds to these requirements. The more-recent legislation also states that the information should be accurate, easy to understand, clear, concise and user-friendly. However, while at first glance this could be seen as a contradiction, because displaying too many items may decrease transparency, the recast Electricity Directive also indicates that not everything has to be printed on the bill itself but could be delivered via other channels, which may facilitate new and innovative formats of consumer-friendly billing. With various pieces of information this is important, as it is hard to fit them on a few pages. Depicting them in an interactive way may have great benefits. Dynamic price models or historic consumption data could all be displayed on a personalised website or via an app, becoming even more relevant if they can provide simulation tools to improve customers' understanding of their tariff and consumption.

CEER strongly stresses that for consumers who are not able to access this information online, their supplier must provide them with their bill and billing information in a manageable and accessible way. However, it also welcomes the possibilities that the recast Electricity Directive offers in terms of digital communication options, such as via e-mail, apps or web-based platforms.

CEER takeaway: The focus should be on the most important information items while keeping bills clear, concise and transparent for all customers. More detailed billing information should be offered on easily accessible digital platforms. However, the right for customers to demand offline access should be retained. The bill should clearly indicate that further information is available, where to find it and how to access it.

Case Study: A tool to help consumers understand their energy bills

In 2018, the Portuguese consumers' association DECO (Associação Portuguesa para a Defesa do Consumidor), with the support of the Portuguese energy regulator ERSE (Entidade Reguladora dos Serviços Energéticos) launched a website to help consumers to read and analyse their electricity bills and the billing information provided by electricity suppliers. The website is called "Fatura Amiga" (Friendly Bill): www.fatura-amiga.pt.

The aim of this website is to improve consumers' experience when reading the information contained in bills and to make that information easy to read and useful.

³ https://ec.europa.eu/energy/topics/markets-and-consumers/market-legislation/third-energy-package_en

This case study presents how the website works, as an example of a tool that can be created to guide consumers and to help them navigate the wide range of information that is made available in order to allow them to gain a complete awareness of billing information. More specifically, tools such as the Fatura Amiga website seek to make consumers more aware and mindful about billing information through user-friendly, accessible and visual explanations. Such tools can be useful for energy National Regulatory Authorities (NRAs) and/or consumer associations to support consumers in understanding their bills and therefore being in a position to choose the best offer on the market for their individual consumption profiles.

The Fatura Amiga website allows consumers to consult a variety of explanations, examples and advice with dedicated sections on:

- understanding bills;
- managing consumption;
- using comparison tools; and
- saving energy.

It also includes a dedicated area with training and capacity-building activities, which are organised by DECO for local public authorities, consumer information bureaus, social solidarity organisations and other institutions. The courses have been held across the country, in an effort to reach as many regions as possible.

Understanding bills

The website provides visual and interactive samples of energy bills from 10 electricity suppliers, explaining the various sections and information in each bill. Consumers can click on individually marked fields of the bill, for which an explanation box appears explaining that item (details in Annex 3). The sample bills (and accompanying explanation notes) can be downloaded for later reference.

In addition, Fatura Amiga dedicates a page to explaining key concepts about the energy system, such as an overview of the full energy supply chain (production, transmission, distribution, supply), liberalised electricity markets, meter readings, bundled products, social tariffs, contracted capacity, time of use schedules, etc.

Managing consumption

By registering one's real energy bill on this platform, a consumer can create a personal profile to manage consumption data, plan future electricity savings and compare the price paid with other tariffs.

Using comparison tools

The site offers consumers direct links to DECO and ERSE online comparison tools for electricity offers, for comparison and also for understanding the environmental impact and origin of one's electricity consumption.

Saving energy

This section of the website provides tips and advice on how consumers can save energy, from household appliances to lighting options to electronic devices.



Figure 1 A screenshot from Fatura Amiga

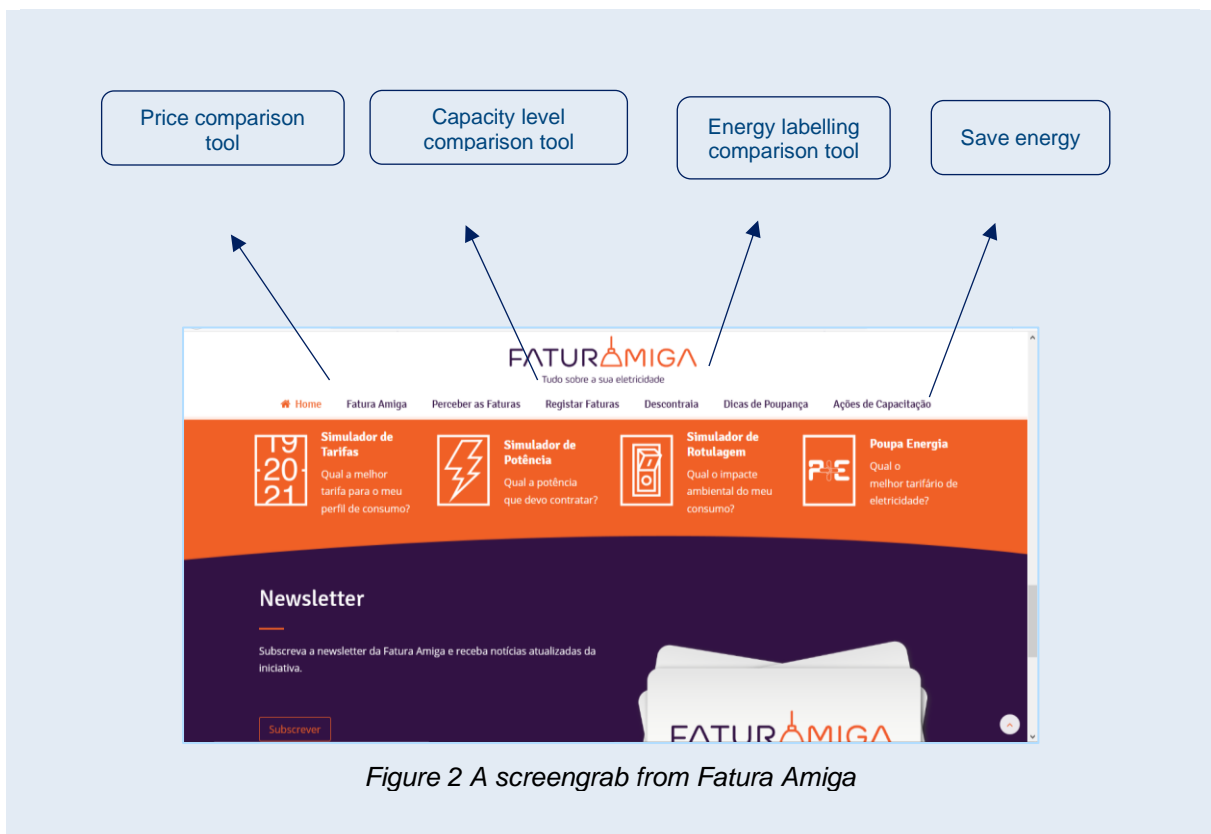


Figure 2 A screengrab from Fatura Amiga

3.1.1 Billing and billing information – minimum requirements

The recast Electricity Directive establishes the minimum requirements that have to be indicated on the price to be paid and the due date of payment. Member States shall ensure that final customers are offered flexible arrangements for actual payment and, where possible, a breakdown of the price should also be shown on the bill.

As shown in Table 1, the list of minimum information that must be provided to consumers also includes:

- the electricity consumption data of the billing period;
- the supplier's contact details;
- the tariff name;
- end date of the contract;
- a reference to the availability and the benefits of switching (see section 3.1.2);
- the unique identification code for the supply point;
- information on dispute settlement rights including contact details to the respective; entity responsible for dispute settlement;
- single point of contact; and
- a link to a price comparison tool.

3.1.2 Benefits of switching

The recast Electricity Directive establishes the electricity bill as an additional tool to enable consumers to manage their energy costs by switching supplier. Hence, a number of items deemed important and mandatory in this respect must be included in the bill and billing information. While not all of them are new requirements, together they now form a “switching package” of information. Consumers must be:

- informed about the availability and the benefits of switching;
- provided with the link to a comparison tool that is in line with Article 14 of Directive (EU) 2019/944;
- provided with their tariff name; and
- provided with their unique identification code.

This information not only adds awareness for supplier switching, but also supports consumers by providing them with all the necessary information in one place. Together with consumption data and electricity costs, consumers can make an informed choice and act on it. In order to reach an aim of the recast Electricity Directive, to facilitate supplier switching, MS and suppliers (or stakeholders responsible) should ensure that the format and display of this additional switching information reduces the risk of information overload on the bill and also provides real informative value for the consumer. It may be useful in that respect to compile the information related to supplier switching at one single point on the bill instead of scattering the information over several pages. As this may not be in the business interest of suppliers, MS and NRAs might want to intervene and set up rules on the layout of the “switching package” information.

The recast Electricity Directive also establishes the new requirement that all MS must have at least one comparison tool (CT) for consumers, and microenterprises with an expected yearly consumption of below 100,000 kWh (Article 14, Electricity Directive). The new legislation also sets minimum requirements for these CTs. Of particular relevance is the requirement that electricity bills must include a link or reference to where these CTs can be found.

National regulatory authorities (NRAs) may provide a CT, but it is also possible that another authority or private companies provide CTs, and that these operate in parallel⁴. If companies offer one or several CTs, then the NRA or another competent authority must issue trust marks for these CTs (e.g. if no public authority CT is available). The decision of who provides the CT and how many are provided with trust marks will in turn influence what is communicated on the bill and the billing information. The CT information will in most likelihood be different in individual Member States, including whether the link or reference which is included in the bill refers to one or several CTs that might be operated by different entities.

The inclusion of references to CTs with trust marks on the bill and billing information improves the final customers’ awareness of where to compare contracts which in turn can increase their engagement and switching activity in electricity markets.

⁴ “CTs for electricity exist in 20 MSs and in 15 MSs for gas. Some MSs have more than 10 CTs, while other MSs have only one”. [ACER Market Monitoring Report 2019 – Energy Retail and Consumer Protection Volume](#), 26 October 2020

CEER takeaway: The new “switching package” information increases awareness and possibilities of switching. Member States should reflect on the intent and purpose of the recast Electricity Directive. If there is other information that is necessary to switch supplier (e.g. contract end-date), they could adapt their national billing rules accordingly.

3.1.3 Consumption data

Where smart meters are installed, the recast Electricity Directive ensures that customers not only have access to their basic consumption data, at no additional cost, but also that they have the means to manage their energy consumption by requiring companies to offer comparisons to previous billing periods or to the usage of a similar-sized household. This information can be included directly in, or be offered alongside, the bill or in periodic settlement instalments. Another option is for the bill to refer customers to another platform such as website or app where they can access their data. Furthermore, historic consumption data will be provided to the customer. The customer can in turn share this data with other parties such as suppliers or other service providers.

All consumers will be provided with the following consumption data:

- electricity consumption data for the billing period

Recalling the summary provided above in Table 1, the following items will also be provided where smart meters are being used and remote reading is enabled:

- a comparison of the current consumption data with the same period in the previous year in graphic form;
- contact information for consumer organisations, energy agencies or similar bodies, including website addresses, from which information may be obtained on available energy efficiency improvement measures for energy-using appliances;
- comparisons with similar final customers in the same user category;
- cumulative data for at least the three previous years at intervals of frequent billing information; and
- detailed historical consumption data made available via internet or the meter interface covering at least the previous 24 months.

CEER takeaway: In order for consumption data to be perceived as relevant and thus make an impact, it has to be displayed in a consumer-friendly, easily understandable way.

Case Study: Providing a data-hub for consumers

Introduction

In accordance with the Electricity Directive (CEP) and national law, the Italian Regulatory Authority for Energy, Networks and Environment (ARERA) has set out the possibility for consumers to access their historical consumption data, as well as a set of contractual information for all contracts in their name, both electricity and natural gas, through the institutional web portal (“**Portale Consumi**”). Indeed, thanks to the Portale Consumi, consumers can now use real consumption data to learn about and identify their energy footprint and also interactively visualise information that is usually reported in multiple billing documents.

Background and scope

In Italy, DSOs (both in the electricity and gas sectors) are responsible for collecting metering data, according to specific regulations in terms of periodicity and granularity of data (i.e. depending on the type of meter installed or otherwise defined contractual aspects).

Key challenges and achievements

The first version of the Portal went live on 1 July 2019. Since then, it has been gradually enriched with subsequent implementation phases. Each consumer can access his/her historical consumption data up to 36 months prior and download relevant information.

The architecture of “Portale Consumi” is made up of:

- a public area, available to all internet users, that provides useful information relating to the contents and functionality of the Portal itself, as well as how to access the private area, how to interpret the data available in it and the references to the relevant legislation and information on the handling and processing of personal data;
- a private area, accessible to the user only through digital authentication, that provides personal and contractual data, consumption data for electricity and gas for all contracts under the name of the authenticated or authorised user.

Both household and non-household customers, thanks to the Portal, can:

- check the personal and commercial information of the contract (for example: the name of the supplier, the start of the contract, the customer type, consumption level⁵ established by contract, the voltage, the bands, the network tariff, etc.);
- check the trend of the consumption levels (to evaluate whether to modify the power level established by contract);
- check the trend of the energy consumption (also to compare their consumption patterns throughout time annually/monthly and to better identify their habits and needs);
- verify energy footprint for RES / energy efficiency investment decisions; and
- verify consumption data in comparison to what was reported on energy bills (where applicable).

Each user can select an energy supply contract to visualise and obtain the related personal and commercial information. Once the consumer chooses the contract to visualise, he/she can obtain commercial information relating to the supply contract and a pop-up menu explains what he/she is visualising (such as differences between DSOs and suppliers or different performances of meters, etc.).

From this section, the users can then go to the section where consumption information is available. The granularity of the consumption data present in the Portal is exactly the same as what is available at the Central Data Hub and depends on the type of meter installed. For 1G smart meters in the electrical sector, consumption data is collected monthly; for 2G meters it is collected on a daily basis. Users can consult tables with a) readings, or the progressive metering data – i.e. the “raw” data or the number read directly on the meter screen – or b) energy consumption levels for each period (month, day) – i.e. the difference between two sequential meter readings. The Portal also indicates if the data is periodic or related to a specific commercial activity, such as switching.

⁵ In Italy the power level has a limit, this limit is modifiable by the end-user upon request and is a contractual parameter.

Interactive graphics and figures are available, and the customer can select or personalise reference time intervals. In the graph below, on the left is the monthly consumption levels for one year, on the right the daily consumption detail for the month selected. No estimates are given in the Portal and where data is missing it is indicated, either (in 1G 2G or for smart meters in the gas sector) because remote reading failed or (especially in the gas sector) because a lower number of meter readings was programmed (regulation has been progressively increasing the minimum number of readings required).

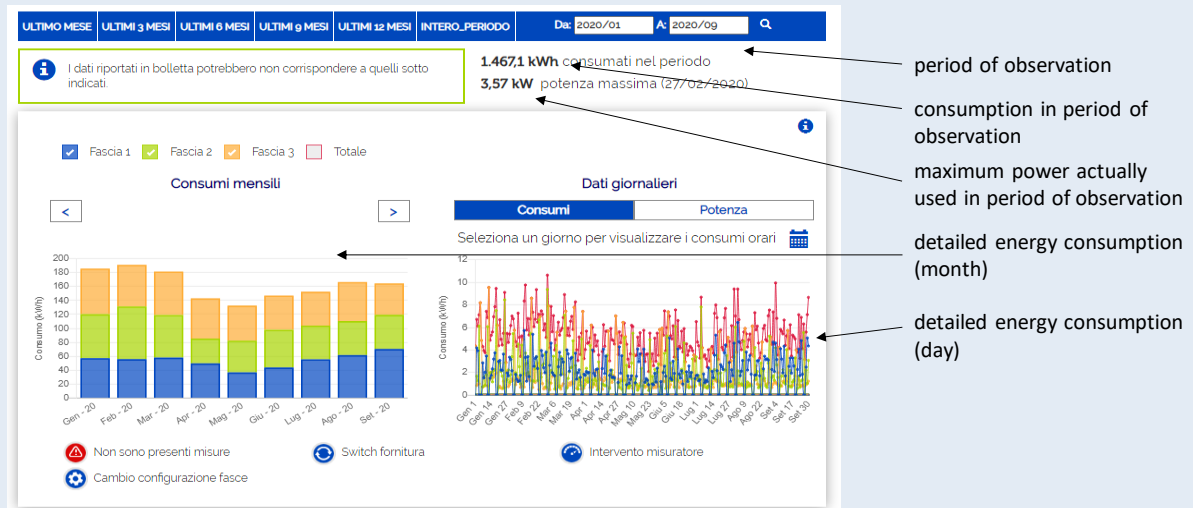


Figure 3 An example of data made available via the Portal

There are several differences between the data made available to the consumer through the “Portale Consumi” and the information given in bills:

- bills are the main way to access information on costs as well as energy consumption and other information and they represent the communication channel between the customer and his/her supplier. In “Portale Consumi”, on the other hand, no type of economic information is provided (e.g. costs) and data is only physical (e.g. readings and consumption);
- Italian regulation provides that billing is typically bimonthly, while once a year bills must report the data of the last 12 months; through the “Portale Consumi” each consumer can access his/her historical consumption data up to 36 months prior;
- the “Portale” provides consumers with effective consumption data collected by DSOs or by consumer self-readings; this type of data is real, not based on estimates⁶;
- the consumption data shown on the “Portale Consumi” is usually available earlier than the same data used by the supplier in the bill. This is due to billing frequency as well as the time it takes for suppliers to process data. In the “Portale Consumi”, data is made available to consumers in almost real time when it is available in the data hub.

⁶ Energy bills may not always be calculated upon the real data available in the “Portale Consumi” (i.e.: bills may show consumption estimates when real readings or non-validated self-readings are missing, if the contract allows that).

The user can visit the “Portale Consumi” from any device (smartphone, tablet or PC) and, for assistance, it is possible to contact by telephone ARERA's Consumer Help Desk, which offers a free customer support service. ARERA is also developing a synergy of the “Portale Consumi” with its “**Portale Offerte**” – the on-line institutional PCT that compares commercial offers available to small customers in the electricity and gas sector – so that this “Portale Offerte” can list the electricity and natural gas offers directly referring to each customer’s real consumption profile, for a better and more integrated service.

Energy consumption data is considered by authorities in Italy as being very sensitive - even if consumers perceive the sensitivity of energy consumption data lower than financial or medical data – therefore access to data stored in the data hub through the “Portale Consumi” is designed to ensure privacy and security are guaranteed in the strictest way, according to the requirements of the GDPR.

3.1.4 Disclosure of energy sources

The recast Electricity Directive reinforced the requirement to offer information regarding the product and supplier mix (and overall energy mix) within the billing information. This is in line with the European Green Deal goal of climate neutrality by 2050. Providing information on energy sources is an important issue to involve the consumers in the green transition. A proper framework also helps to avoid greenwashing. Disclosure of energy sources raises awareness of one’s own climate and environmental footprint, which may encourage consumers towards a “greener” consumption profile. Nevertheless, trust and understanding of the energy sources disclosure information are very relevant to reach this target. Easily accessible and transparent information is a core pre-requisite to achieve this.

A subject for future research could be to explore the impact the provision of this information has on consumer behaviour. Does the mere disclosure of energy sources trigger changes in the overall consumption profile? Or do a vast proportion of consumers fail to react to this information, thus rendering the attempts at nudging the consumer futile? Depending on the conclusion of such future research, legislators may wish to re-evaluate the tools to influence consumer behaviour towards sustainable energy consumption. In the future, new technologies (such as smart metering) may help to shorten the gap between the moment a disclosure is issued for the electricity generated and the time when information of that disclosure is available for consumers.

CEER takeaway: Easy access to information and consumers’ trust and confidence in the reliability of the information they are given are important factors for consumer engagement in retail markets and in the energy transition. Energy mix information must be accurate, certified and carefully monitored to avoid greenwashing.

3.2 How is the information provided?

The recast Electricity Directive specifies what has to be on an electricity bill and billing information and how often it shall be provided. It leaves a lot more room for interpretation when it comes to the question of how all this information should be made available. A printed bill might not be fit for the purpose of communicating detailed consumption data. Dynamic price products might give a push to apps or other online-based solutions, since price signals will have to be communicated faster and the amount of data involved increases. However, it is important to bridge the digital divide and not to leave digitally illiterate (or disengaged)

consumers behind, as a result of removing the option of a physical paper bill. Consumers must not be obliged to interact with digital communications and technology. They may not be able to (or choose not to) for any number of reasons.

CEER Takeaway: A distinction should be made between which information should be delivered actively (e.g. via e-mail or a letter) to consumers and that which could be offered passively via a website, an app, etc. Digitalisation offers new ways of communicating information and data. The recast Electricity Directive allows for a more diverse set of communication channels.

3.2.1 Billing and billing information frequency

The content of and frequency that consumers receive bills and billing information will depend on the predominant billing system in their respective MS, whether bills are issued digitally or not and whether smart meters are installed (and allow for remote reading).

The recast Electricity Directive foresees an annual bill with periodic instalments or a monthly bill information (see. Table 1). However, consumers who receive their electricity bill annually will also receive monthly billing information, if their meters are read remotely. As summarised in Table 1, if there is no remote reading, they will receive their billing information four times per year electronically (or on request) or twice a year by mail.

CEER takeaway: The recast Electricity Directive ensures that no matter which billing system is used, and regardless of whether or not smart meters are installed, a consumer will receive information frequently. In order not to create an information overload, it is crucial to emphasise which information is important and how a consumer can use this information to manage electricity consumption and costs.

4 Looking forward – Implications for future billing

The recast Electricity Directive advances the existing rules on billing and billing information by striving for the provision of all necessary information to the consumer. Sufficient information is relevant in the context of the increasing complexity and diversity of the energy market (e.g. some products might look alike at the first glance, but then prove different in details). In addition to contract information, bills and billing information are the main channel for a supplier (or DSO) to communicate detailed information to the customer. By checking price increases when reading the bill, the consumer may start to think of switching to another supplier. An interesting topic for future research and corresponding enhancement of regulation may be the question of the actual impact of price signals (i.e. on bills) on consumer behaviour and the question of consumer inactivity in spite of price increases.

The recast Electricity Directive also establishes options for new market models to emerge, including energy communities, peer-to-peer trading and dynamic prices. We already see additional, and often bundled, services being offered in the electricity sector (e.g. electric vehicle charging, self-consumption and demand response, energy efficiency and consumption management). The impact of these new interactions and services will also have an impact on how bills are designed, what information they contain and how they reflect multiple contractual relationships.

CEER takeaway: To support the consumer, ensuring they receive all relevant information and are able to make an appropriate choice, billing and billing information should be optimised continuously – this is a task for suppliers (or DSOs) as well as for MS and NRAs. In that process, it might be fruitful to learn from existing billing regimes in other contexts. By looking at other markets (e.g. telecommunication or insurance) some aspects of billing and billing information (provision of complex information, bundled offers/pricing) may prove relevant for the energy market in the future. Fields of interest for stakeholders (e.g. legislators, regulators, consumer (organisations) and suppliers) could be the complexity of bills and avoiding misleading practices. An exchange between stakeholders, including those issuing the bills, on best practices and innovative concepts may help in the process of achieving consumer-friendly bills. In the context of prioritising and reducing (which the following sub-chapter will explore in detail), the questions to be asked here include: How can stakeholders (such as suppliers, regulators, DSOs) ensure that the amount of information foreseen by the recast Electricity Directive does not overburden the consumer? How can Member States and NRAs resolve the risk of information overload when implementing the recast Electricity Directive rules in order to untangle the complexity of information?

4.1 Prioritising and reducing billing information

The sheer amount of information on an electricity bill has the potential to render it difficult for consumers to comprehend their bills. Techniques need to be developed to ensure consumers are not confronted with too much information, resulting in them understanding less and feeling overextended. This chapter will deal with the aforementioned concepts of Prioritisation and Reduction, through two case studies:

Case study: Simplified billing of electricity consumption and distribution

Electricity bills contain mandatory information requirements all designed to enhance transparency and to protect consumers (Directive (EU) 2019/944). A 2017 survey by the Danish Competition and Consumer Authority (DCCA) showed that few consumers find it easy to compare electricity providers on important parameters such as price and environmental impact⁷.

Behavioural insights study

In 2019, the DCCA ran a lab-based experiment with Danish consumers, testing potential improvements to the electricity bill. The objective of the study was to test the intelligibility of the bill's content and consumers' ability to compare products across providers in terms of their price and environmental impact. The DCCA developed a standardised and simplified version of the bill (see figures 7 and 8). The newly developed bill set out to convey three simple messages:

1. The price for each kWh consumed;
2. the environmental impact of energy consumed; and
3. the price to pay – and when.

Active consumers demanding renewable energy

In the experiment, 96% of the consumers with the simplified electricity bill correctly reported the share of energy from renewable sources, compared to only 29% of the consumers who had the current billing format.

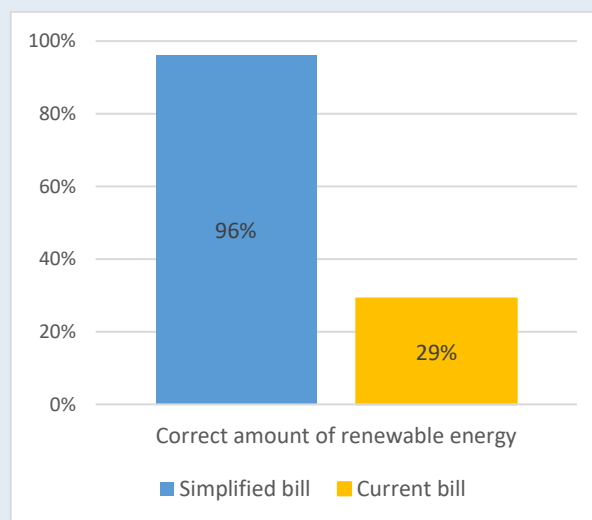


Figure 4 Share of test respondents in the two groups that correctly report the right amount of energy coming from renewable sources

Note: Test respondents (n=100) had unlimited time to find the amount of energy from renewable sources in the electricity product that they had a bill from. For each correct answer, the respondent received a token to be used in

⁷ Based on answers from 1.047 consumers evaluating their own electricity bill incl. the information requirements (Directive 2012/27/EU) in place in 2017.

lottery for winning a gift certificate for DKK 1,000. The results are statistically significant ($p < 0.001$). Source: Results are from the second block of the lab-based experiments, the DCCA 2019

Furthermore, respondents with the simplified bill experienced less frustration and found key pieces of information faster compared to respondents with the current bill (figure 5). A simplified bill makes it easier for consumers to find the necessary information to act according to their preferences for renewable energy and could thus contribute to an increase in demand for renewable energy and support the green transition.

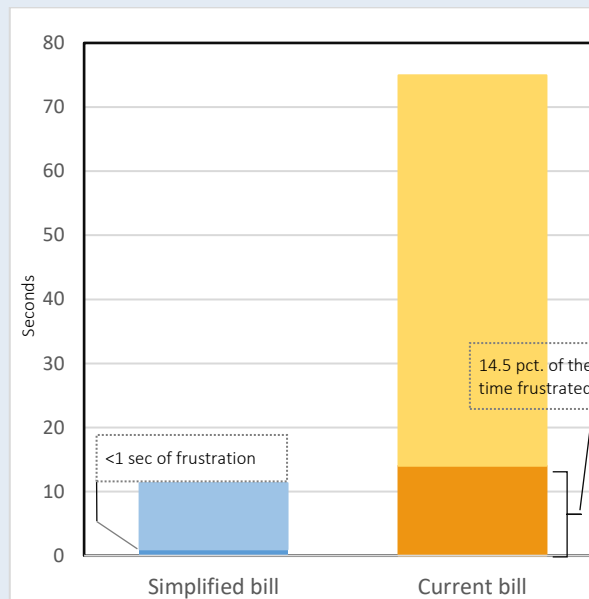


Figure 5 Average time spent on finding the share of energy coming from renewable sources, and average time spent being frustrated finding it. Comparison between group that received the simplified bill and the group that received a bill as it is today.

Note: Respondents with the current bill spent up to 7 times longer finding information on the share of renewable energy, compared to respondents with the simplified bill, yet answered wrong in 2/3 cases (as illustrated in figure 4). The respondents with the simplified bill experienced significantly less frustration during this task. The results are statistically significant ($p < 0.001$).

Source: Results are from the second block of the lab-based experiments, the DCCA 2019.

Similar results were found on tasks related to price information, such as: the unit price per kWh, the total price and the total usage in kWh. Please contact DCCA for access to the full report of findings⁸.

The importance of a comparable price per kWh

Respondents with the simplified bill found it easier to find the correct price and consumption information, and were significantly more certain of their answer, compared to respondents with the current bill (figure 6). For example, when asked how easy it was to find the total price per kWh, respondents with the simplified bill reported on average 6.6 on a scale from 1 (very hard) -7 (very easy). Respondents with the current bill reported on average 4.8, which, although significantly lower, is still above average on the Likert scale.

⁸ Email: lros@kfst.dk The full report is currently only available in Danish.

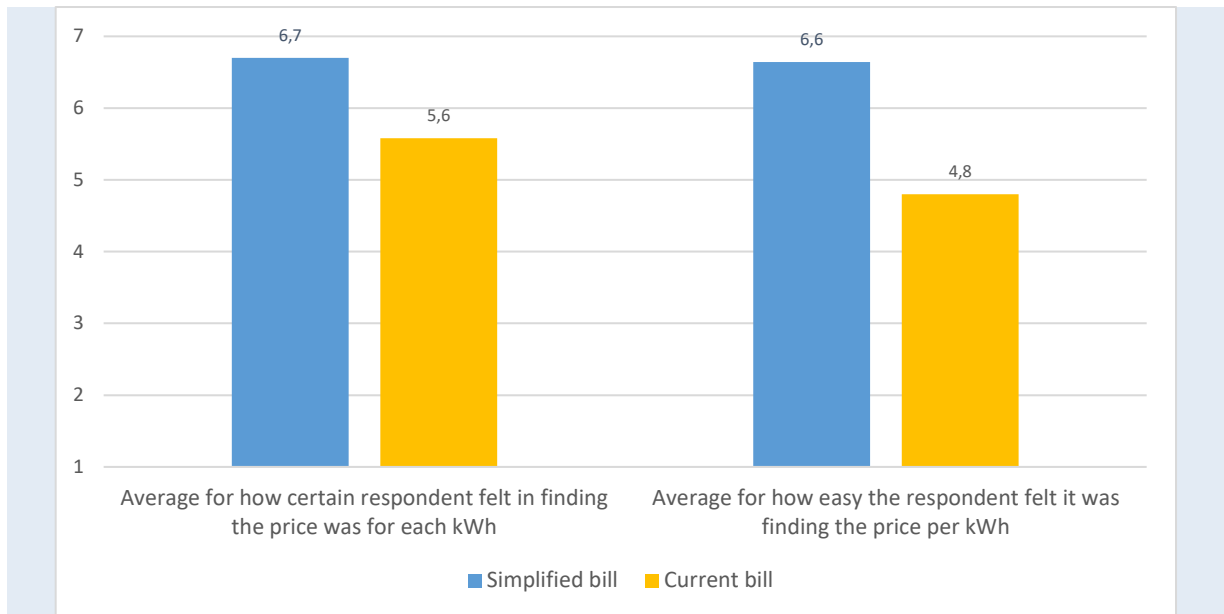


Figure 6 Self report on how easy and how certain they felt they were, in their answer of what the total price was for each kWh consumed.

Note: Likert scale from 1-7, going from very uncertain to very certain, and very difficult, to very easy. Average at group level. The results are statistically significant ($p < 0.001$).

Source: Results are from the second block of the lab-based experiments, the DCCA 2019

This result indicates a relevant issue concerning consumers' actual and perceived understanding of the current electricity bill; while only 4% of the respondents with the current bill correctly report the price per kWh, the majority still think that they had the correct answer. The EU MS are given an opportunity to introduce a standardised simplified billing of electricity provided via a durable medium, as part of the implementation of Directive (EU) 2019/944. This study shows that such an implementation strategy can contribute to an enhancement in transparency, and thus consumer welfare.

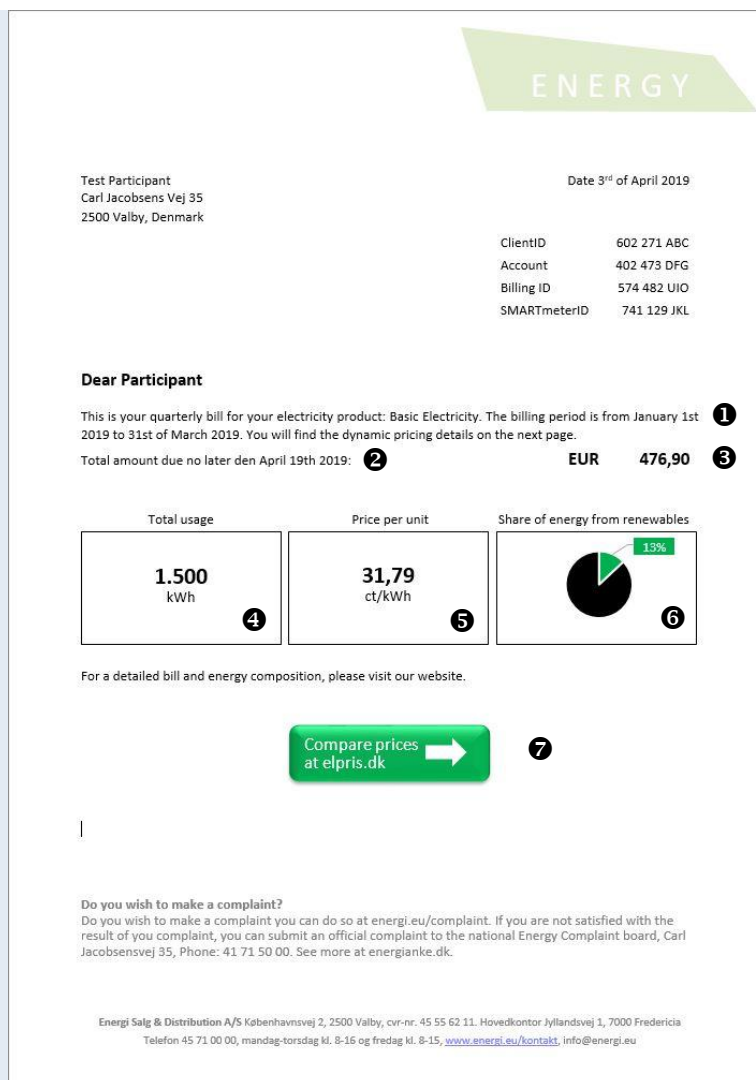


Figure 7 The front page of a simplified electricity bill that was used in DCCA's lab experiment.

The front page of the simplified bill had three behavioural conditions in focus:

- i. Payment information: Period for the usage "1", due date for payment "2", the total price to be paid "3", as well as the total usage in kWh "4".
- ii. Preference relevant information: The total price for each kWh consumed "5" and the share of energy derived from renewable energy sources "6".
- iii. Shorten the journey for the consumer that wishes to compare their product with alternatives, by linking straight to the price comparison website, allowing the information from the bill to be transferred to the site for a personalised price showing based on usage information from the consumer's smart meter "7".

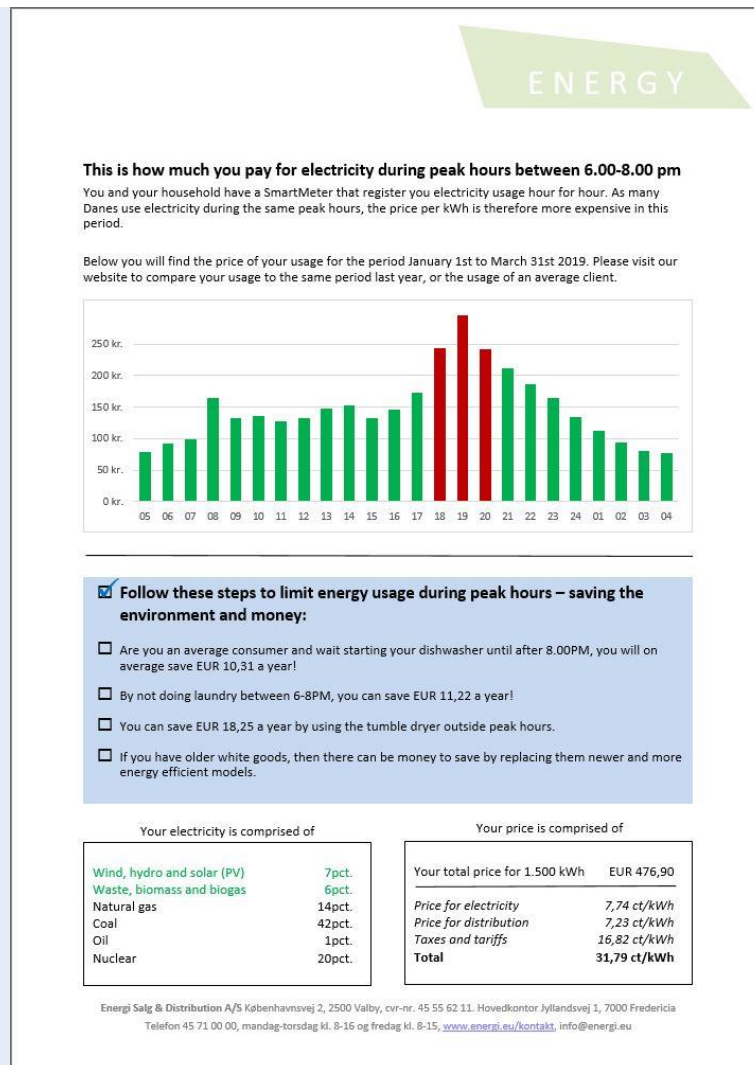


Figure 8 Second page of a simplified electricity bill that was used in DCCA's lab experiment

The second page of the simplified bill focused on dynamic pricing elements and mandatory price- and energy sources breakdowns:

- i. Graphical presentation of price divided into one-hour intervals, where the period between 6-8 pm was highlighted "8". This is a peak period in the Danish market, thus some electricity providers and/or distributors make use of differentiated tariffs to cope with the demand. This segment of the second page of the bill could also be used for a graphical illustration of the consumer's usage compared to the same period last year.
- ii. An info-box that provide specific recommendations for the individual consumer on how to save energy. For example, by postponing turning on the dishwasher until after 8 pm. "9". This segment of the second page of the bill could be used to show a comparison to the usage of an average consumer in the same customer category.
- iii. A breakdown of energy sources and the price, but still with an emphasis on renewable energy sources and the total price for each unit used "10".

The Danish Competition and Consumer Authority experiment shows the importance of providing relevant information (e.g., consumption, price and source of energy) in a practical manner to consumers in order to ensure an active participation in the market.

The need to avoid information overload and to provide user-friendly bills becomes increasingly important with the roll-out of smart meters which increases the level of data and information available to the customer. Guidance may help market stakeholders choose the most relevant information to form part of the bill and the less relevant information which can be provided on other channels.

CEER takeaway: Of course, any opportunity may also imply some challenges. If done wrong, prioritisation and reduction in billing and billing information may lead to misleading practices. Some suppliers may be more likely to highlight information about their services than information which may negatively impact them (e.g., time-fixed price increase). Keeping an eye on this issue is essential when opening the field of prioritisation and reduction by separating billing and billing information. Misleading practices in billing already exist and should not be fostered under the new billing rules introduced by the recast Electricity Directive and concepts related to those (such as the idea of prioritisation and reduction). However, different tools for fighting misleading practices and protecting consumers from such are already in place and need to be maintained in order to achieve fair and consumer-friendly billing. The following case study presents a selection of tools set up to support consumers against these practices.

Case Study: Supporting consumers against misleading practices

As in other markets, the complexity and market size of the energy market implies some issues regarding mistakes or misleading behaviour with respect to billing and billing information (e.g., observed in Germany by consumer organisations). To help consumers solve or avoid those issues, the European and National legislative framework foresee several instruments and bodies (such as ombudsmen or competent authorities). Nevertheless, there is room for additional consumer services to supplement the obligatory legislation. In Germany, there are several examples of service providers which collect and publish additional information on billing and billing information with respect to mistakes and/or misleading behaviours by suppliers. This case study will briefly introduce two of them.

Market Observer – Energy

www.Marktwaechter-energie.de (“market observer – energy”) is a website operated by “Verbraucherzentrale – Niedersachsen” (Public Consumer Service of Lower Saxony).⁹ In addition to providing different services (information) such as switching advice and guidance on how to issue a complaint against your supplier, they also provide examples of “misleading billing information”. The website is simplified so every consumer can easily understand the issues.

The website names the most common mistakes regarding the bill (address, prices and period, calculation method, metering, payments, bonus) and provides some advice. Moreover, a video supports the understanding of the bill.

⁹ Consumer Service is mainly public financed. The aim of work is to act and belong to consumers in matters of private consumption. They provide analysis and legal help regarding confusing offers and a view of public market conditions.



Figure 9 A screengrab of a video aiding understanding of the bill

Source: www.Marktwaechter-energie.de


Consumer Help – Energy Supplier

In addition to publicly-funded services, there are some private service providers, for example www.verbraucherhilfe-stromanbieter.de (Consumer Help – Energy Supplier) started by a consumer who was a victim of misleading behaviour. He started to collect and publish examples of mistakes and misleading behaviour by energy suppliers to support other consumers with their complaints or to leave their contracts. Besides alerting consumers to common mistakes and misleading behaviour (hiding significant price increases, wrong calculation) the website offers a tool to check the bill and also provides a list “naming and shaming” suppliers.

Hilfe für betroffene Verbraucher

Auf meiner Internetseite erfahren Sie:

1. Wie Sie Ihre Beschwerde gegenüber Ihrem Stromanbieter lösen,
2. über welche Stromanbieter sich Verbraucher besonders häufig beschweren,
3. wie Sie Ihrem bestehenden Stromanbieter sicher kündigen und
4. wie Sie zu einem seriösen Stromanbieter wechseln.



**Ich helfe kostenlos!
Warum?
Das erfahren Sie hier.**

Preiserhöhung: versteckt & >10%?

- Mit meinen Vorlagen fechten Verbraucher täglich Preiserhöhungen an und erhalten fast immer ihr Geld zurück.
- Insb. bei immergrün, Stromio, Regionale Energiewerke & FuxxSparenergie sollten Sie mich kontaktieren!

Abrechnung falsch?

- Kontrollieren Sie Ihre Abrechnung selber mit meinem Berechnungs-Tool.

Figure 10 A screengrab of Consumer Help - Energy Supplier

Source: www.verbraucherhilfe-stromanbieter.de

The website also publishes examples of “wrong” bills and provides a clear guideline for checking a bill. In contrast to other services, the website is not that easy to understand but offers a full set of information.

4.1 Opportunities and challenges of new information channels

There is a great opportunity to avoid information overload of consumers by providing structured and supporting billing information using information technologies such as apps or websites. On the other hand, receiving a bill via an individual account on the electricity provider’s website may create issues regarding accessibility of the bill, caused by digital illiteracy, lost passwords or other login credentials, or simply, due to consumer inactivity (opening a letter to receive a bill may seem less burdensome than having to log in online – depending on the design of the web portal). Suppliers and NRAs should be cautious that a web-based solution does not become a hindrance to accessing the bill (be it intended or not). Digital billing tools should facilitate access to the bill and to billing information and not pose an additional burden. Therefore, when it comes to digital tools, e.g., a user-friendly app might prove more easily accessible than a complicated web portal, in which the consumer has to log in through a web browser. When using a web portal, suppliers should make sure that the login credentials are easy to memorise and do not create unnecessary additional barriers (e.g., being able to log in using your name and address instead of having to type in a specified username or a contract number, that customers have to note down somewhere).

Going beyond the “old-school” format of having a bill within one self-contained document (be it physical in paper or as a pdf file) and making use of the possibilities offered by digitalisation may provide a new concept of a dynamic and user-friendly bill, e.g., with several tabs providing the necessary information while remaining well-arranged and easy to access.

CEER takeaway: An electricity bill may be more useful and easier to grasp for the consumer if it does not consist of a solid block of information, but rather offers the information in components for the consumer to individually choose, e.g., by clicking on them. This would also contribute to the aims of Prioritisation (the user is empowered to decide which elements of the bill are of priority for him) and Reduction (the consumers will only see the information that they deem relevant in the moment and do not have to deal with a poorly sorted overload of data).

5 Conclusions

The bill is typically the most frequent means of contact between a consumer and his/her supplier. Moreover, the bill also contains relevant information regarding the contractual relationship, meaning the consumer needs the bill and/or billing information to check whether or not the contractual conditions are still correct over time. In order to ensure that this information is received by the consumer, the legislators – at European level as well as in MS – have set up a framework to ensure a mandatory minimum set of relevant information to be included in the bill which should be easily available, accessible and understandable. This framework was developed over time, with the legislation of the 2009 3rd Energy Package being updated and reinforced by the 2019 Clean Energy Package, which is currently being implemented at national level. With implementation of the Clean Energy Package’s Electricity Directive, the bill must contain at least the price to pay, breakdown of price and when the payment is due. Additional billing information has to be provided by the supplier, such as consumption data of the billing period, contact details of the supplier, tariff name, contact details of ADR and more.

The present report highlighted the following points:

- The bill is one of the main means of communication between supplier and consumer, but it has become more and more complex with an increasing amount of information to provide. Too much information does not help the consumer. On the contrary, it may lead to the consumer actually picking up *less* due to feeling overwhelmed. Therefore, the ideas of Prioritisation and Reduction increasingly become necessities in order to achieve a consumer-friendly bill, where key information is not “buried” in a mass of content. Stakeholders should, however, keep in mind that the concepts of Prioritisation and Reduction should lead to picking/highlighting information which benefits the consumer, irrespective of their own business interests.
- In order to prioritise and reduce, the focus needs to be put on the most important information items to keep bills clear, concise and transparent for all customers. At the same time, one cannot omit items of information prescribed by the recast Electricity Directive. Prioritising is the key here.
- If done correctly, the new “switching package” information may increase consumer flexibility and decrease practical barriers to switching. As this information may go against the supplier’s natural business interest, stakeholders (e.g., regulators) may need to supervise the market here.
- Digitalisation offers new ways of communicating information and data. The rules of the recast Electricity Directive allow for thinking “outside the box” and developing new, innovative concepts for billing. However, it is important to choose a design that enables simplicity and accessibility. Digital tools should in fact present a real improvement for consumers compared to “classic” paper bills and not add additional barriers. At the same time, digitally illiterate (or disengaged) customers must not be left behind, so receiving a paper bill should remain a viable option.
- The new EU legislation may increase the frequency of information delivery. In order to make sure consumers benefit, they need to understand how they can make use of this information.

The report also addresses some challenges in implementing the provisions of the recast Electricity Directive. With the growing complexity of energy markets due to current developments like digitalisation (e.g., smart meter roll-out enables dynamic price contracts), self-consumption (prosumer models), energy communities, interoperability or bundled products, etc., the bill and billing information must:

- (1) become more relevant; and
- (2) contain more information than in the past.

To ensure that the consumer benefits from these developments, it is important to ensure that the relevant billing information is accessible and available in a proper manner. This means that all relevant stakeholders – including suppliers, NRAs, consumer organisations, etc. – have to ensure a fair billing practice. The increase in complexity and the amount of information should not be allowed to result in a swamp of information overloading the consumer. To contribute to this ongoing discussion, the present report included a case study of a behavioural experiment dealing with “reading a bill”. Experience from all stakeholders may help to prioritise and reduce relevant billing information in order to give more guidance to the consumer. Using new technological solutions and more complex information may also induce information overload or misleading practices. Therefore, stakeholders in general and consumer protection organisations in particular should protect consumers from economic damage and unfair practices. This may strengthen the trust of consumers and therefore their willingness and ability to participate actively in the market, which is a core driver of market development.

EU legislation sets out minimum requirements regarding bills and billing and contractual information. However, it leaves room for Member States/stakeholders to find the relevant balance of precise and clear information to provide to consumers. In 2021, CEER will follow up on this issue, by launching an open discussion regarding the way forward for a “fair and useful” billing practice. CEER will also review its guidelines of good practice on comparison tools, to ensure that they are fit-for-purpose in the context of the CEP and of emerging market models.

Annex 1 – List of abbreviations

Term	Definition
ACER	Agency for the Cooperation of Energy Regulators
ADR	Alternative dispute resolution
ARERA	Autorità di Regolazione per Energia Reti e Ambiente
CEER	Council of European Energy Regulators
CEP	Clean Energy (for all Europeans) Package
CT	Comparison Tool
DCCA	Danish Competition and Consumer Authority
DECO	Associação Portuguesa para a Defesa do Consumidor
DSO	Distribution System Operator
ERSE	Entidade Reguladora dos Serviços Energéticos
EU	European Union
GDPR	General Data protection regulation
IT	Information technology
kWh	Kilo watt hour
MS	Member State
NRA	National Regulatory Authority
PCT	Price Comparison Tool
SMC	Small and medium size companies

Annex 2 – Overview of the billing and billing information provisions in Electricity Directive 2019/944

Identification item	Theme	DIRECTIVE (EU) 2019/944 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU (recast) CHAPTER III CONSUMER EMPOWERMENT AND PROTECTION		
		Article	Content	Comment / analysis
1	Contractual changes indication on the bill and consultation of consumer organisation	Article 18 Bills and billing information	4. If the contract provides for a future change of the product or price, or a discount, this shall be indicated on the bill together with the date on which the change takes place. 5. Member States shall consult consumer organisations when they consider changes to the requirements for the content of bills.	<ul style="list-style-type: none"> Contractual changes that imply changes in the price to pay are indicated directly on the bill. The bill plays a reminder role for the future evolution of the product and price provided to the customer and allows the consumer to react to any evolution as a prosumer and not only to pay the amount stipulated on the bill Consultation of consumer organisations is required when changes to the requirements for the content of bills are considered. This should ensure consumer protection issues when changing the rules.

<p>2</p>	<p>To be displayed separately - price and date of payment</p>	<p>ANNEX I MINIMUM REQUIREMENTS FOR BILLING AND BILLING INFORMATION</p>	<p>1. Minimum information to be contained on the bill and in the billing information 1.1. The following key information shall be prominently displayed to final customers in their bills, distinctly separate from other parts of the bill: (a) the price to be paid and a breakdown of the price where possible, together with a clear statement that all energy sources may also benefit from incentives that were not financed through the levies indicated in the breakdown of the price; (b) the date on which payment is due.</p>	<p>This new article defines the information to be displayed distinctly on the bill. Therefore, information regarding the price to be paid and the date of payment, will be highlighted. This might help the consumer to identify this key information easily, whether it is a short or long document.</p>
<p>3</p>	<p>Price breakdown</p>	<p>ANNEX I MINIMUM REQUIREMENTS FOR BILLING AND BILLING INFORMATION</p>	<p>3. Breakdown of the final customer's price The customer's price is the sum of the following three components: the energy and supply component, the network component (transmission and distribution) and the component comprising taxes, levies, fees and charges. Where a breakdown of the final customer's price is presented in bills, the common definitions of the three components in that breakdown established under Regulation (EU) 2016/152 of the European Parliament and of the Council (1) shall be used throughout the Union.</p>	<p>This new article defines how the price should be broken down in the bill. This should help to understand what the consumer is paying for.</p>

We identify as major evolutions the following parts):

Identification item	Theme	CEP	3 rd Energy Package	Comment
		Article	Article	
1	Electronic billing and flexible arrangements for payment	Article 18 Bills and billing information	Directive 2012/27/EU - art 10	No major change except for the deletion of “information contained in these bills shall not be considered to constitute a request for payment”.
2	Consumption, tariff and contractual information	Annex 1	Annex 7	Contractual details such as name and contact details of the supplier, or end date of the contract if applicable, or identification code, are mentioned on the bill. Switching information is displayed on the bill and might make it easier to compare offers. The bill contains in one single document all the information necessary for the consumer to compare his contract to other existing contracts and to switch to another contract or supplier whenever he wants to.
3	Dispute information	Annex 1	Directive 2009/72/EC - art 3	The article specifies directly the contact details of the entity responsible pursuant to Art. 26 and not only the means of dispute settlement available. This should facilitate the dispute process for the consumer.
4	Actual consumption-based billing - conventional meters	Annex 1	Directive 2012/27/EU - art 10	For consumers equipped with conventional meters, the article sets the frequency of actual consumption-based billing to at least every six months or once every three months, if requested or where the final customer has opted to receive electronic billing. This should ensure the consumer receives regularly a billing based on actual consumption. Having frequent information on actual consumption

				may heighten awareness of the consumer on his consumption and energy demand.
5	Actual consumption-based billing	Annex 1	Annex 7	This article distinguishes customers with conventional meter from customers with smart meter entailing different billing frequency.
6	Actual consumption-based billing - smart meters	Annex 1	Directive 2012/27/EU - art 10	This article sets also a frequency of actual consumption-based billing for consumer equipped with smart meters to every month. It also specifies this information to be made available via the internet.
7	Information requester	Annex 1	Directive 2012/27/EU - art 10	The article distinguishes supplier and service provider to take into account the increasing role of energy service companies.
8	Energy sources contribution and CO2 emissions	Annex 1	Directive 2009/72/EC - art 3	<p>The article defines more accurately the level of information regarding the contribution of each energy source to the overall mix of the supplier. This might facilitate the consumer's understanding of the European energy market.</p> <p>This article also specifies the usage of guarantees of origin, which should increase consumer awareness and trust of the energy mix and sources.</p>



Annex 3 – Additional information on the Case Study: A tool to help consumers understand their energy bills

Additional information on understanding bills:

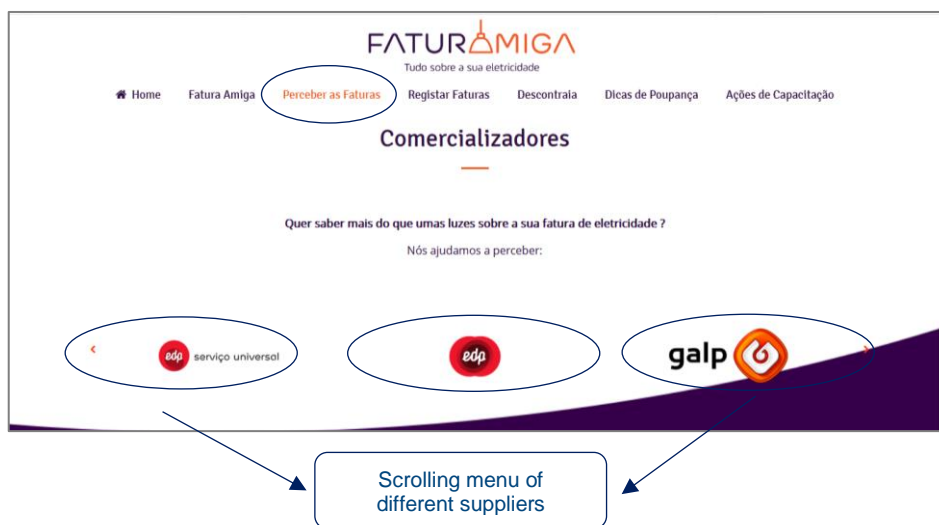
As the report emphasises the implementation of billing issues in the Clean Energy for All Europeans package, this extra section focuses on the “how to understand your bill” section of the Fatura Amiga website.

This part of the website includes examples of 10 suppliers’ billing layouts, explained in a detailed but simple way, in order to clarify the billing information included on each invoice. Each field in the bill’s corresponding page is associated to a number and when the user clicks on the number the details of that field are displayed.

The way the details in the invoices are presented by each supplier effectively explains what the important fields for consumers are and might help them to manage their consumption profiles.

How it works:

1. After clicking on the page on understanding bills, the user chooses the service provider:



2. The site presents a general image of the bill layout and the consumer can read more about each item on the bill, becoming aware of what it refers to, in a user-friendly way: simple, concise and complete, by clicking on the number regarded to the part of the bill he/she wants to know more about:



FATURAMIGA
Tudo sobre a sua eletricidade

Home Fatura Amiga Perceber as Faturas **Registar Faturas** Descontraia Dicas de Poupança Ações de Capacitação

Página 1 | Página 2

EDP SERVIÇO UNIVERSAL

Para explorar a sua fatura, clique sobre os diferentes números, e fique a perceber melhor as informações que são apresentadas.

Download

Chosen supplier

Total number of pages of the invoice

Clickable details explaining items on the bill

3. The user can click on the numbers to know more about each item:

FATURAMIGA
Tudo sobre a sua eletricidade

Home Fatura Amiga Perceber as Faturas Registar Faturas Descontraia Dicas de Poupança Ações de Capacitação

Página 1 | Página 2

EDP SERVIÇO UNIVERSAL

Para explorar a sua fatura, clique sobre os diferentes números, e fique a perceber melhor as informações que são apresentadas.

Download

Supplier's contact data

Dados de contacto

Saiba os contactos a utilizar em caso de avaria ou de necessitar de informações acerca do seu contrato e/ou serviço.



Example of another supplier:



Annex 4 – About CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national energy regulators. CEER's members and observers comprise 39 national energy regulatory authorities (NRAs) from across Europe.

CEER is legally established as a not-for-profit association under Belgian law, with a Secretariat based in Brussels to assist the organisation.

CEER supports its NRA members/observers in their responsibilities, sharing experience and developing regulatory capacity and best practices. It does so by facilitating expert working group meetings, hosting workshops and events, supporting the development and publication of regulatory papers, and through an in-house Training Academy. Through CEER, European 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.

In terms of policy, CEER actively promotes an investment friendly, harmonised regulatory environment and the consistent application of existing EU legislation. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable Internal Energy Market in Europe that works in the consumer interest.

Specifically, CEER deals with a range of energy regulatory issues including wholesale and retail markets; consumer issues; distribution networks; smart grids; flexibility; sustainability; and international cooperation.

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More information at www.ceer.eu.