

Contact details of the respondent

Name **Bo Lindörn ***

Organisation/Company **Independent Electricity retailers in Sweden ***

Country **Sweden ***

Phone number **00460733666394 ***

Email address **bo.lindorn@oberoendeelhandlare.se ***

Confidential: No

(A) Do the CEER 2012 recommendations need to be updated and if so, how?

1. CTs reliability and customer confidence

Do you think that different or further recommendations are needed in order to promote overall CTs reliability and customers' confidence in those tools?
What should those recommendations focus on?
What elements are considered by commercial CTs as obstacles to their participation in a regulated verification scheme?
How could these obstacles be removed while preserving customers' interests?
In which terms do you think CTs should manage the information submitted by customers?

We don't think that there are any needs for more recommendations in order to promote overall CTs reliability and customers' confidence in those tools, but the different contracts can be very different with respect

Confidential: No

2. Scope and usability of the tool

Do the GGP recommendations related to the scope and structure of the information provided by CTs need to be enhanced, or cover additional issues?
Should the stance in recommendation 4 that CTs should ideally show an exhaustive picture be reconsidered?
Does this stance remain relevant to both commercial and non-commercial CTs?
Should additional recommendations specifically address the comparison of customers' current contract with available offers, and in what terms?
How could this be done without a much bigger data management load on customers, energy suppliers and CT operators?

No, we think that the existing recommendation nr 4 will be sufficient.

Confidential: No

3. Clarity and comprehensibility of price and non-price information

Do the recommendations need to be modified in order to ensure that CTs offer clear, comprehensible and verifiable information to customers?
What aspects of information should they address?
How should information about elements other than price be presented in CTs in order to allow customers a valuable comparison based on their preferences, and to avoid that information overload results in less trust?
Do you think that the GGP should address how users' reviews or other subjective ratings should be reported in CTs (which offer this information) and, in that case, what principles should be considered?

We don't think that the price comparison should include to many non-price elements, just information of the general main-conditions of the contract e.g. variable or fixed prices and for how long period the contract

Confidential: No

4. Customer involvement and activation

Should the GGP include additional recommendations aimed at removing obstacles in the use of CTs by particular groups of customers, or at improving inactive customers' involvement?
Do you have any specific recommendations on consumer data disclosure related to CTs that should be implemented?
What actions could be taken by different stakeholders (including NRAs) in order to encourage a wider number of customers to use CTs?

We think that it is important to point out the average price-level for inactive customers and compare it with corresponding price-level for active customers.

Confidential: No

(B) What developments in different fields (technology, retail markets...) may make further updating of the GGP necessary in the future?

5. Smart meters and innovative tariffs

Due to the expected development of more complex indexed or dynamic electricity tariffs, do you think that there is a need for CTs to compare the final costs resulting from different price structures and indexes?
In your opinion, what is the best way for a CT to compare different tariff structures and provide customers with the most accurate comparison?

Different contracts can differ with respect to fix and variable components so the advantage of a specific contract will differ depending of the actual consumed volume of energy. Therefore it is necessary to carry out

Confidential: No

6. Data management

What is the best way to provide customers with all relevant information in CTs?
Do you think an initiative that pursues the standardisation and easy access of the customer's information (like QR codes, Green Button or similar) will be helpful in order to empower and activate energy customers?
In that case, should this standardisation be done at national or at European level?

We doubt that it could be useful to use QR codes or Green Button in this field. The contracts are too complex to compare with such measures. If it will be possible with some standardization it should in the first place

Confidential: No

7. Demand side response

Do you think that future developments could raise the need to include demand side response in CTs?
If so, what is the best way to include demand side response offers on existing CTs? (If possible, please provide examples.)

No, we don't think so and we also mean that demand side response also is depending on the network tariffs as well so it is difficult to isolate the demand side response to electricity prices.

Confidential: No

8. Prosumers

Do you think that there is a need to include the market of self-generated electricity and offers for prosumers in the CT? (If possible, please provide examples of current offers in your market.)
How should offers addressed to potential prosumers (e.g. offers including products or services related to the installation of a generation equipment) be managed by CTs, and help customers to valuably assess the

We think that the importance of prosumers will increase and that it therefore will be relevant to develop CTs for comparison between prosumers,

Confidential: No

9. Services added to energy contracts

Do you think that future services added to energy contracts would change the way CTs work and should this be addressed in the GGP?
In this regard, which services will be most relevant, and what will not be suitable for presentation in CTs?
How should CTs present multiple services bundled with energy supply in a way that consumers can make informed decisions?
How do you think that CTs could help customers in assessing the price elements of services that are bundled into an offer?

No, we think that it is important to avoid that. One main reason to this is that there are several service providers independent from the energy suppliers who supply different kind services as a complement to the energy supply.

Confidential: No

10. Access at the CT by mobile devices / apps

Do you think CTs have to be compatible with mobile devices in order to foster their use?
Do you think that the different level of information and functionalities that apps or mobile versions of CTs can offer with respect to web-based CTs will have to be specifically addressed by the GGP?
What aspects and principles should be considered?

If there are any CTs e.g. connected to the NRA it should of course be possible to get access to them by mobile devices / apps.

Confidential: No

11. Collective switching

Are collective switching initiatives and CTs compatible?
Or do you think they are competitors?
Can we envisage a possible role of CTs in promoting consumers awareness of collective switching opportunities?
Should a future GGP review include collective switching issues?

No, we don't think that there is a special need for such a comparison. If a group of consumers get offers from suppliers then they rely on the existing CTs in order to evaluate the actual offer.

Confidential: No

12. CTs providing overview of different CTs (meta-CTs)

Do you think web services comparing the results of different CTs will be developed in the energy sector?
What specific recommendations will they require from a customer perspective?

Yes, it is difficult to understand why this not should be developed in the energy sector. We think that the existing legislation for consumer protection will be enough.

Confidential: No

13. Other topics

Do you have any other ideas or suggestion that could be interesting to analyse about the topics that CTs will face in the future?

There is an urgent need to introduce hourly metering and billing for all customers. Price differences between the hours will be bigger with more wind and solar power in the system and then do these price signals

Confidential: No

Thank you for participating in the public consultation!