



Energy Community Regulatory Board

Survey on the status quo of electricity billing practices in the Energy Community

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1 INTRODUCTION

1.1 The Energy Community

On 25 October 2005 the Treaty Establishing the Energy Community (hereinafter: “the Treaty”) has been signed by the European Community and the authorities of Albania, Bulgaria, Bosnia and Herzegovina, Croatia, the Former Yugoslav Republic of Macedonia, Romania, Serbia, Montenegro and the United Nations Interim Mission in Kosovo (UNMIK¹)². Following signature and ratification of the Treaty Moldova joined the Energy Community as of 1 May 2010.

By signing the Treaty the signatory parties agreed to implement the *acquis communautaire* on electricity, gas, environment, competition and renewables³ with a view to realizing the objectives of the Treaty and to create a regional gas and electricity market within South East Europe (SEE⁴).

The Energy Community Regulatory Board (ECRB)⁵ operates based on Article 58 of the Energy Community Treaty. As an institution of the Energy Community the ECRB advises the Energy Community Ministerial Council and Permanent High Level Group on details of statutory, technical and regulatory rules and should make recommendations in the case of cross-border disputes between regulators.

1.2 Scope

Transparent and customer friendly billing methodologies are one of the key requirements for raising customers’ awareness for switching options and making use of their right to choose their energy supplier. Only where bills are understandable and clearly separate between energy prices, tariffs and other costs (e.g. taxes, green energy et al), customers are able to compare offers. The need for transparent billing has been underlined by 3rd EU energy legislative package⁶. European Commission (DG SANCO) has already adopted a best practice recommendation for standard bills⁷.

¹ Pursuant to United Nations Security Council Resolution 1244.

² Following ratification, the Treaty entered into force on 1 July 2006. For details on the Treaty and the Energy Community see www.energy-community.org.

³ For details of the relevant *acquis* see: http://www.energy-community.org/portal/page/portal/ENC_HOME/ENERGY_COMMUNITY/Legal/Treaty

⁴ Title III of the Treaty. Covering territories of Contracting Parties and neighboring EU countries.

⁴ Title III of the Treaty.

⁴ Title IV of the Treaty.

⁵ For details see www.ecrb.eu.

⁶ Article 3 and Annex I of the 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://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0055:0093:EN:PDF>

⁷ European Commission (DG SANCO) Working Group on Billing: Good Practice Guidance for Billing, 2009, http://ec.europa.eu/gas_electricity/doc/forum_citizen_energy/2009_09_29_citizens_energy_forum_reports_and_materials.zip

Having in mind the relevance of the topic, a survey on the status quo of electricity billing methodologies in the Energy Community and recommendations for a best practice approach have been made part of the Energy Community Regulatory Board (ECRB) Work Programme 2010⁸.

1.3 Methodology

The present paper is based on data collected via questionnaire completed by the regulatory authorities of Energy Community Contracting Parties (Albania, Bosnia and Herzegovina - represented by entity regulators, Croatia, former Yugoslav Republic of Macedonia, Moldova, Montenegro, Serbia and UNMIK), one Observer (Ukraine) and four neighboring EU Member States (Austria, Greece, Italy and Slovenia). The survey and recommendations are **related to electricity bills**. Where results for Bosnia and Herzegovina differ for its entities (the Federation of Bosnia and Herzegovina and Republika Srpska), they are displayed separately in this survey.

⁸ ECRB Work Programme 2010, available at http://www.ecrb.eu/portal/page/portal/ECRB_HOME/ECRB_ADMIN/DOCUMENTS/ECRB%20WP%202010_public%20version%20excl%20detailed%20timing.pdf

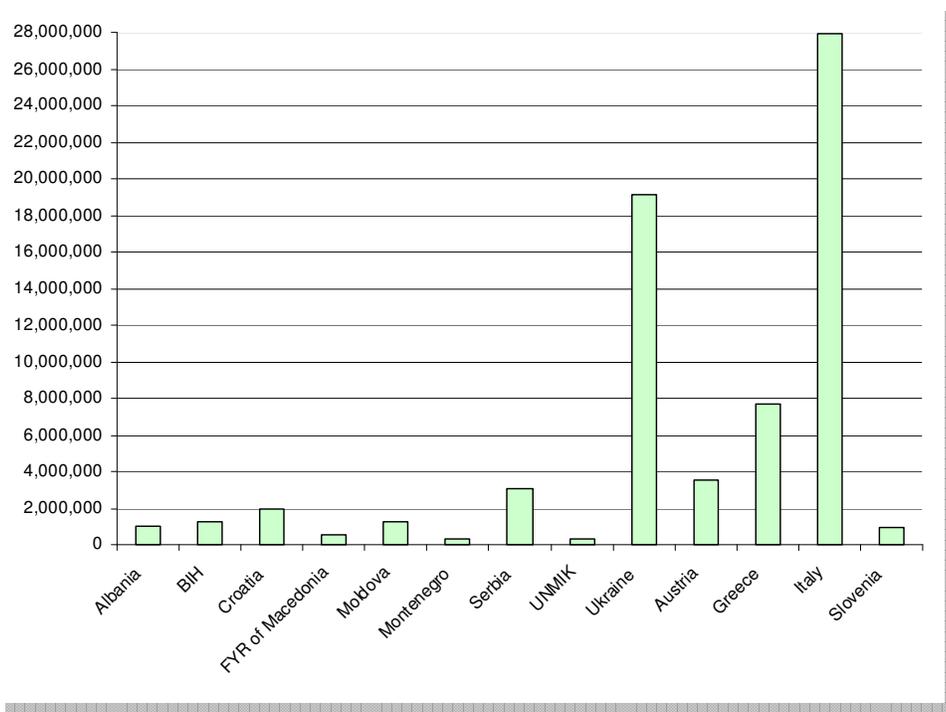
2 FINDINGS

The analysis follows the structure of the questionnaire and summarizes the answers received for each question.

2.1 Number of household customers supplied with electricity

The number of household customers strongly varies among investigated electricity markets: from 351 719 customers in Montenegro to more than 27 million in Italy. Among Contracting Parties the greatest number of residential customers has Serbia- around 3 million, followed by Croatia with 2 million and Bosnia and Herzegovina with 1.3 million. Other electricity markets are rather small, with less than 1 million households supplied with electricity. In EU neighbouring countries the size of households electricity markets also vary: from around 1 million in Slovenia, 3.5 million in Austria and close to 8 million in Greece to abovementioned great Italian market. Ukraine has close to 20 million household customers. The differences in the number of household customers in analyzed markets are shown in the graph below.

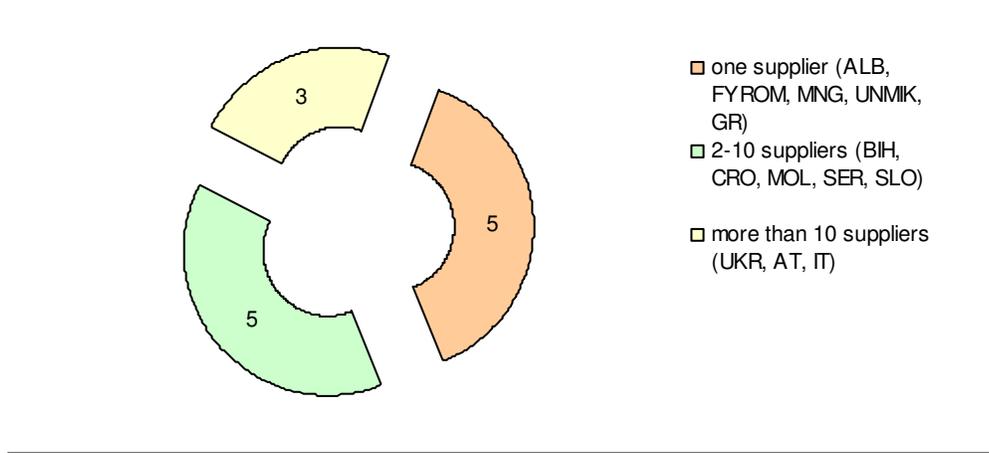
Figure 1: Number of household customers supplied with electricity



2.2 Number of electricity suppliers

For having a better picture of the markets investigated it is relevant to know how many electricity suppliers for both household and non-household customers are active on the markets. The results presented in the figure below exclude those suppliers that solely supply non-household customers.

Figure 2 Number of electricity suppliers



In four Contracting Parties and in one EU Member State only one (incumbent) supplier of electricity exists. In Bosnia and Herzegovina, Croatia, Moldova, Serbia and Slovenia there are more than one electricity supplier; in Austria, Italy and Ukraine more than ten.

2.3 Who develops the rules for electricity bills? Who monitors compliance with these rules?

Developing of rules related to electricity bills is the sole responsibility of regulatory authorities in six cases (Federation of Bosnia and Herzegovina, Moldova, Montenegro, UNMIK, Greece and Italy). In Slovenia, the regulator gives consent to the general conditions for supply issued by supplier. In Albania, Bosnia and Herzegovina- Republika Srpska, Former Yugoslav Republic of Macedonia and UNMIK the regulator is involved in setting the rules. The ministry is solely engaged in developing of billing rules in Austria and the similar situation is in Ukraine, where the Government sets the framework supply contract. In Croatia, the ministry is involved in setting the rules, while in Serbia the rules are defined in the law on customer protection and in the decree on electricity delivery.

The role of the national and entity regulators in **monitoring** of the rules on billing is dominant among both Contracting Parties and EU neighbouring countries:

- in 8 out of 9 Contracting Parties or entities the regulators are involved or responsible for monitoring the rules. In one Contracting Party (Serbia) the rules are monitored by the inspectors within a ministry;
- in 3 out of 4 analyzed EU Member States the responsibility lies with the regulator (in Slovenia with an inspectorate within a ministry);
- In Ukraine the monitoring is performed by the regulatory authority to some extent (i.e. in the process of complaints handling).

2.4 Is the electricity bill for household customers issued separately from other services?

The electricity bill for household customers is issued separately from other services **in almost all** the CPs and Ms with the following exceptions:

- In the former Yugoslav Republic of Macedonia the bill contains also communal tax for public lighting.
- In Austria and Italy it is possible that electricity bill contains also different services, like water and district heating. If this is the case, in Italy, the electricity part of the bill has to comply with the regulations set up by the regulator.
- in Ukraine in some cases the electricity bill may be issued together with other communal services.

Overall, in only three out of 14 cases the bill may – with some exceptions – include also other services. In the majority of cases – 12 out of 14 cases – however, the bill contains only the electricity costs.

2.5 Do customers receive one bill for both electricity supplied and for the network use or two separate bills?

In all analyzed electricity markets the customers receive one bill for both electricity supplied and for the network use. The exception is Austria, where in some cases the customers receive two bills: one from DSO for network use and the other from the supplier for energy (for some alternative suppliers that do not issue combined bill).

2.6 Does the electricity bill for household customers include all information of the “recommended bill”?

The term “recommended bill” in this case refers to bills developed in line with Annex 1 (and Annex 2, if applicable) of the best practices guidelines for billing⁹. The results are summarized in the table below.

Table 1 Does the electricity bill for household customers comprise all information of the “recommended bill”?

Market	Answers
ALB	<p>NO - It does not contain following information:</p> <ol style="list-style-type: none"> 1. point of delivery box with technical information plus suppliers billing address, EAN code, 2. duration of contract, including deadline to switch 3. price €cent (other currencies)/kWh (with base price & variable elements and min/max price variations, if appropriate), other discounts 4. Customer Switching Code 5. Duration of contract 6. Information on regulator’s telephone number 7. Network charge 8. Additional billing info and calculation based on consumption, if applicable: fuel mix, efficiency green tips, regulator’s number <p>Annex 2 reconciliation bill is not applicable</p>
BIH	<p>NO - It does not contain following information:</p> <ol style="list-style-type: none"> 1. point of delivery box with technical information plus suppliers billing address, EAN code, 2. duration of contract, including deadline to switch 3. price €cent (other currencies)/kWh (with base price & variable elements and min/max price variations, if appropriate), other discounts 4. Customer Switching Code 5. Duration of contract 6. Information on regulator’s telephone number 7. Network charge 8. Additional billing info and calculation based on consumption, if applicable: fuel mix, efficiency green tips, regulator’s number <p>Annex 2 reconciliation bill is not applicable</p>
CRO	<p>NO - It does not contain EAN code and duration of contract including deadline to switch</p>
FYR of Macedonia	<p>NO - the bill does not include following information:</p> <ol style="list-style-type: none"> 1. Duration of contract, including deadline to switch 2. Customer Switching Code 3. Duration of contract 4. Fuel mix, efficiency and green tips.

⁹ Available at http://ec.europa.eu/energy/gas_electricity/forum_citizen_energy_en.htm and Annex 1 of the present survey.

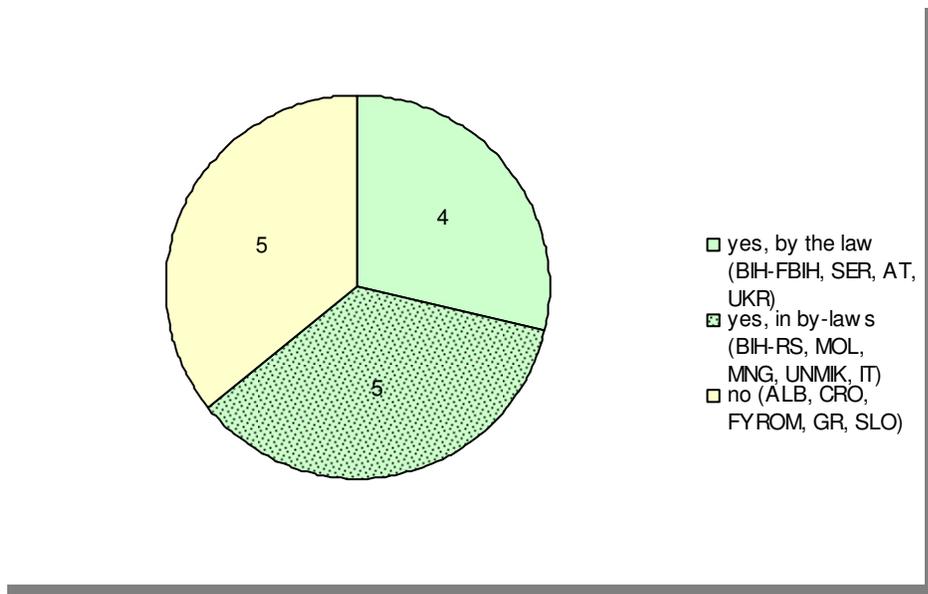
Market	Answers
MNG	Not available
MOL	Not available
SER	NO - issues such as customer switching and fuel mix in the electricity bill is not applicable for the time being
UNMIK	NO - The electricity bill for household customers comprises most of the information from the "recommended bill", such as: point of delivery, monthly sum bill, total debt, meter readings, billing period, tariff information, energy consumption price breakdown, additional information such as telephone number, contact address, emergency numbers etc. But the missing information is: duration of contract including deadline to switch, customer switching code etc.
AT	NO - It does not contain following information: <ol style="list-style-type: none"> 1. point of delivery box with technical information 2. duration of contract, since this is not applicable for unlimited contracts 3. Customer Switching Code 4. Information on regulator's telephone number 5. deadline to switch (not applicable)
GR	NO (Missing information on duration of contract, deadline to switch and customer switching code. The new electricity bill which is in line with Annex 1 will come into force, under the new Supply Code- estimated within 2010)
IT	NO (It does not contain price €/cent (other currencies)/kWh)
SLO	YES
UKR	NO (Monthly bills consist of only one page, which contains most of the information from the recommendations (page 1), but none of those from page 2 or other subsequent pages)

The table above clearly shows that **in the majority of investigated electricity markets** the electricity bill for household customers does not comprise all information from the "recommended bill". Only in Slovenia electricity bills includes all data as recommended by the guidelines for good practice. The information that is typically missing relates to the contract duration and switching data.

2.7 Is the content of electricity bills defined?

In most of the investigated electricity markets the electricity bill is defined **either by law or by secondary legislation** (general supply conditions in Bosnia and Herzegovina-Republika Srpska, Moldova and UNMIK, tariff rules in Montenegro and regulation in Italy). Among the markets where the electricity bill is not prescribed by law, the **regulator** has related responsibilities in Greece and Slovenia. More in detail, in Greece the regulator gives informal consent to the bill structure developed by the supplier; in Slovenia the regulator defines minimum transparency requirements. The results clearly indicate that the content of bills is understood as important in most of the cases.

Figure 3 Is the content of electricity bill defined?



2.8 Which information can be found on the electricity bill?

The question which type of information can be found on electricity bills has been split into five sub-categories: identification data, price and product data, metering related data, data on past consumption and fuel mix and, finally, some additional data.

2.8.1 Identification data

As seen from the table presented below, customers' **metering or connection point is well defined**. In all cases the supplier's details, customer's name, billing and supply address, date of issue, payment due date and billing period are specified on the bill (with the exception of UNMIK, where supply address is missing). Differences exist with respect to the reference number, but also here the customer account ref. number is overall specified.

Table 2 Identification data¹⁰

Identification data	ALB	BIH		CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
		BIH-FBIH	BIH-RS											
Supplier's details														
Customer's name														
Billing address (address of the person to whom is bill addressed)														
Supply address (address of the point of delivery)														

¹⁰ Boxes marked in green indicate that the relevant information is available from the electricity bill.

Reference number ¹¹	ALB	BIH		CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
		BIH-FBIH	BIH-RS											
a. customer account ref. number														
b. number of connection point														
c. number of metering point														
d. number of point of delivery														

¹¹ The table indicates which of the four options a-d of displaying the reference number is applied in the individual markets. Boxes marked in green indicate that the relevant category is applied. In some cases more than one approach is chosen.

Other ¹²	ALB	BIH		CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
		BIH-FBIH	BIH-RS											
Date of issue														
Payment due date														
Billing period														
Other		Number of meter			number of meter					Per. of saving the bill (3 years)		Billing and tariff cat.		

¹² Boxes marked in green indicate that the relevant information is available from the electricity bill.

2.8.2 Price and product data

The price and product data specified on the bill show the **largest variety** among the analyzed bills. There is **no common content except** for the total consumption and payable amount excluding and including VAT that is available from the electricity bills in all investigated markets.

- Concerning energy product and price related data, only in Italy and Slovenia the bill contains specified data. The energy product – such as e.g. the fuel mix – is specified only in Austria, Italy and Slovenia. A specific capacity charge is displayed on the bill in only 6 out of 14 analyzed electricity markets.
- As mentioned, data on total consumption and the payable amount excluding and including VAT is specified in all cases. In addition, in 8 out of 14 markets benefits and subsidies are also specified; in Austria, more precisely, this relates to bonuses and rebates rather than benefits and subsidies.
- Network (transmission and distribution) charges are separately displayed only in 5 analyzed markets, namely Croatia, Montenegro, Austria, Greece and Italy. The same is true for the supply margin that is displayed in bills in Croatia, Montenegro, Greece and Italy. Levies and/or taxes and duties are specified in electricity bills of all analyzed markets.
- In the entities of Bosnia and Herzegovina also some other information is available from the electricity bill, such as metering point costs, an explanation of the rates etc.

Table 3 Price and product data¹³

Price and product data	ALB	BIH		CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
		BIH-FBIH	BIH-RS											
Energy product specification (special product such as usual fuel mix, green fuel mix, other)														
Capacity charge (fix charge depending on the connection capacity)														
Energy charge: variable charge depending on energy consumed in high and low tariff														

¹³ Boxes marked in green indicate that the relevant information is available from the electricity bill.



Price and product data	ALB	BIH		CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
		BIH-FBIH	BIH-RS											
Energy charge: variable charge depending on energy consumed in single tariff														
Total consumption														
Payable amount excl. and incl. VAT						VAT for non-household customers								
benefits and subsidies											Bonuses and rebates			

2.8.3 Metering related data

The investigated metering related data includes: actual meter reading and the amount billed, the estimated amount billed and meter reading date. It shows that

- Information on actual meter reading and the amount billed is available from the electricity bills of all analyzed markets.
- The estimated amount billed is specified in the bills of 9 out of 13 markets.

Table 4 Metering related data¹⁴

Metering related data	ALB	BIH	CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
Actual meter reading and amount billed													
Estimated amount billed													
Meter reading date													

¹⁴ Boxes marked in green indicate that the relevant information is available from the electricity bill.

2.8.4 Data on past consumption and fuel mix¹⁵

Table 5 shows that information on contribution of energy sources to the fuel mix is available only from electricity bills in Austria and Slovenia. Additionally, in these countries also data on related CO₂ emissions and produced nuclear waste is displayed in the electricity bills. Data on the amount of electricity consumed in the previous year or billing period is specified in the electricity bills in 5 out of 13 analyzed markets (Montenegro, Serbia, Ukraine, Italy and Slovenia).

Table 5 Data on past consumption and fuel mix¹⁶

Information on contribution of energy sources in the fuel mix	ALB	BIH	CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
a. Green line													
b. RES-E													
c. Other										CO2 emissions, produced nuclear waste			CO2 emissions, produced nuclear waste
Data on the electricity consumed in previous year/billing period										Some suppliers include but not obligatory			

¹⁵ Reconciliation bill or monthly bill.

¹⁶ Boxes marked in green indicate that the relevant information is available from the electricity bill.

2.8.5 Additional data

Only three of all investigated markets – namely Albania, Montenegro and Italy – electricity bills do not include data additional to the information discussed in the previous chapters. In Bosnia and Herzegovina, former Yugoslav Republic of Macedonia, Moldavia, UNMIK and Slovenia information on service hotlines, contact hours, emergency numbers and contact data of network operator are parts of the bill. In all other markets such information is only partly displayed in the electricity bills (for details see Table 6).

Table 6 Additional data¹⁷

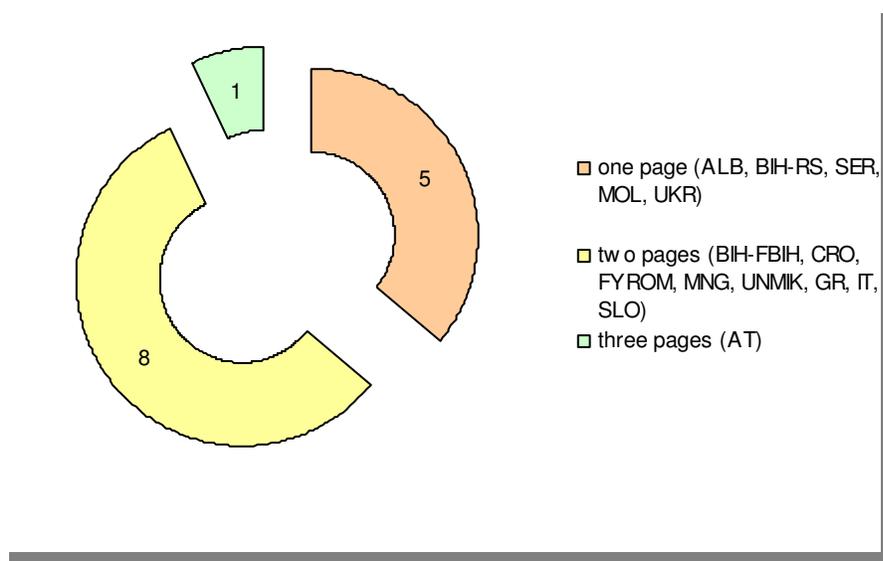
Additional data	ALB	BIH	CRO	FYROM	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
Queries hotline and contact hours													
Emergency number													
Name and contacts of network operator													
Other					Info about regulator								

¹⁷ Boxes marked in green indicate that the relevant information is available from the electricity bill.

2.9 How many pages has the electricity bill?

Aside its content, also the number of pages is an indicator for the user-friendliness and transparency of bills. In the overall majority of cases – i.e. 8 out of 14 – electricity bills have **2 pages**, in 5 cases only one page and in 1 case three pages. The yearly reconciliation bill in Slovenia has 3 pages.

Figure 4 Number of pages in the electricity bill

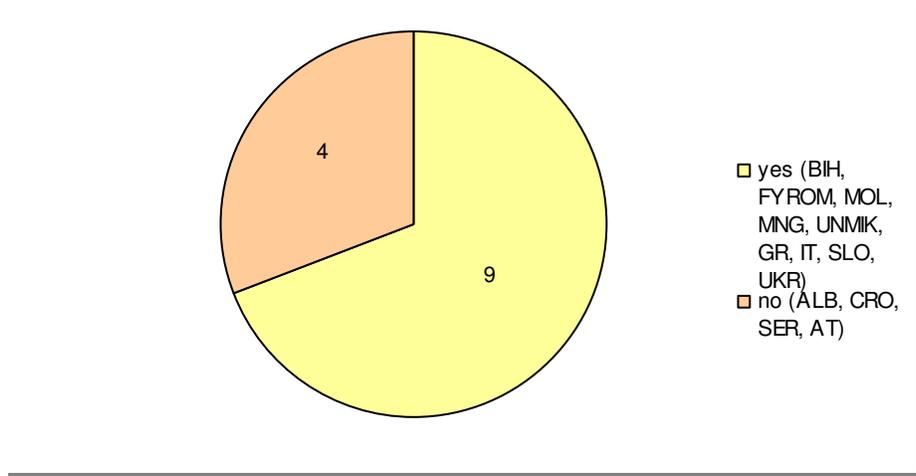


2.10 Can customers compare the actual and the billed consumption?

In general, customers can compare the billed and actual consumption by performing their own private meter reading. This possibility, of course, assumes that customers have access to meters.

In 9 out of 13 markets the customers can compare the actual and the billed consumption. Only in UNMIK data can be verified at any time. Contrary, data on consumption cannot be verified at any time in Austria and Bosnia and Herzegovina (Republika Srpska). However, the picture on this question is not complete since a number of regulators did not provide an answer.

Figure 5 Can customers compare actual and billed consumption?

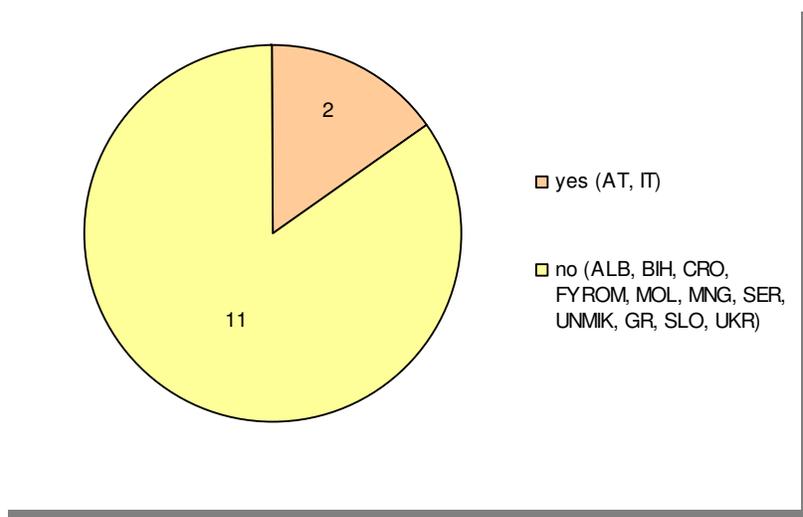


2.11 Can customers choose the form of electricity bills?

User-friendliness of billing is higher where customers can choose between the form in which bills are issued (e.g. hard copy, electronic submission et al).

With the exception of Austria and Italy, customers of the investigated markets cannot choose the format of their electricity bill. In Austria and Italy customers have the possibility to choose between electronic and paper issuing and are provided information on the costs related to both options (e.g. additional costs for issuing bills in paper form). However, in Italy the suppliers are not obliged to offer different forms of billing and the availability consequently depends on the contract.

Figure 6 Can customers choose the form of electricity bill?



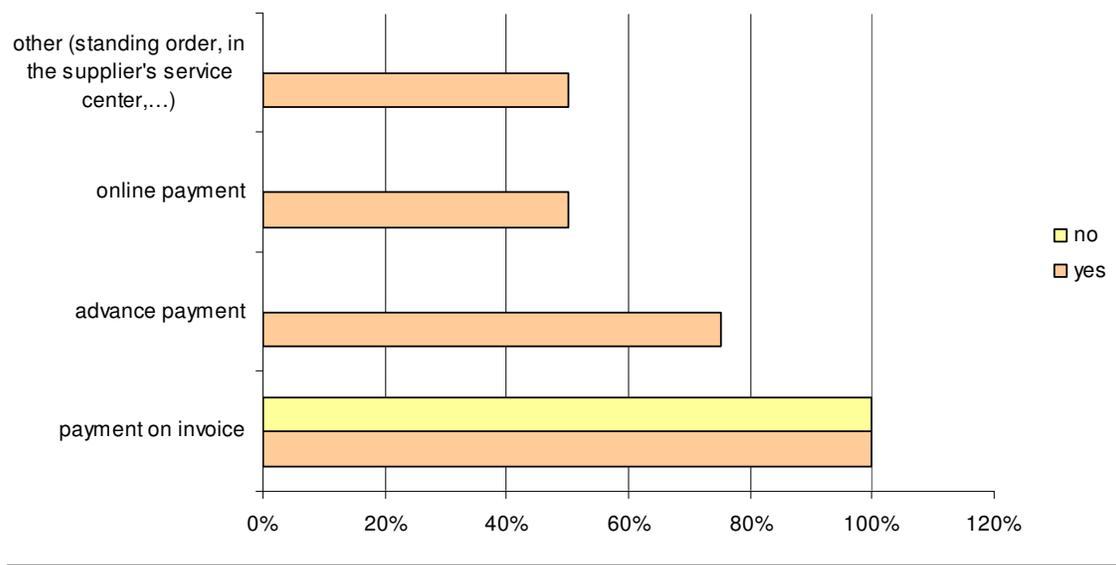
2.12 Can customers choose the payment method?

Another criterion for evaluating the user-friendliness of bills refers to the choice of customer on the payment method for their electricity bills.

The analysis shows that in most cases - 12 out of 14 - customers can choose between at least two methods - one of them being payment on invoice. Where a choice does not exist (Bosnia and Herzegovina-Republika Srpska and Croatia) it is assumed that payment on invoice is the only method.

Figure 8 shows the extent to which customers make use of different payment methods in the analyzed markets. For example, advance payment is possible in almost 80% of cases, while online payment is applicable in only 50% of the investigated markets. In the category “other payment methods” standing orders and cash payment at service centre are the most frequently applied options.

Figure 7 Can customers choose the payment method of electricity bill?



2.13 How are customers informed about the various payment options?

For being able to choose between payment methods, customers need to be informed about their right to choose. An analysis of the markets where different payment options exist (see chapter 2.13) shows that:

- In most the cases the electricity bill serves as source of information about the various payment options.
- In former Yugoslav Republic of Macedonia and Ukraine customers are informed by formal letter of the supplier; by media in Montenegro.
- Related information is normally part of the contract in Austria and Italy.
- In Serbia customers need to contact their supplier to find out about the payment options

The assessment details are presented in Table 7.

Table 7 Information on various payment options¹⁸

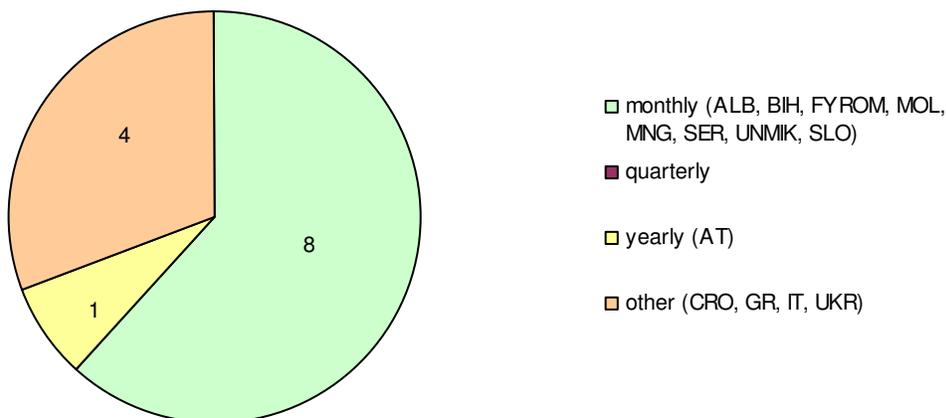
Information on various payment options	ALB	BIH		CRO	FYR of Macedonia	MOL	MNG	SER	UNMIK	UKR	AT	GR	IT	SLO
		BIH-F	BIH-RS											
Electricity bill														
Formal letter from supplier														
Other						In regulation and on customer request	media	on customer request			contract		contract	

¹⁸ Boxes marked in green indicate that the relevant information is available from the electricity bill.

2.14 How often is the bill sent to customers?

In most of the analyzed electricity markets, i.e. 8 out of 13, customers receive their bill monthly. Only in Austria the electricity bill is sent to customers once per year. Issuing of bills on a quarterly basis is not applied in the investigated markets. In Greece bills are issued bi-monthly, in Italy and the Ukraine the frequency is regulated or individually settled by contract. In Croatia balancing (reconciliation) bills are sent twice per year (every six months).

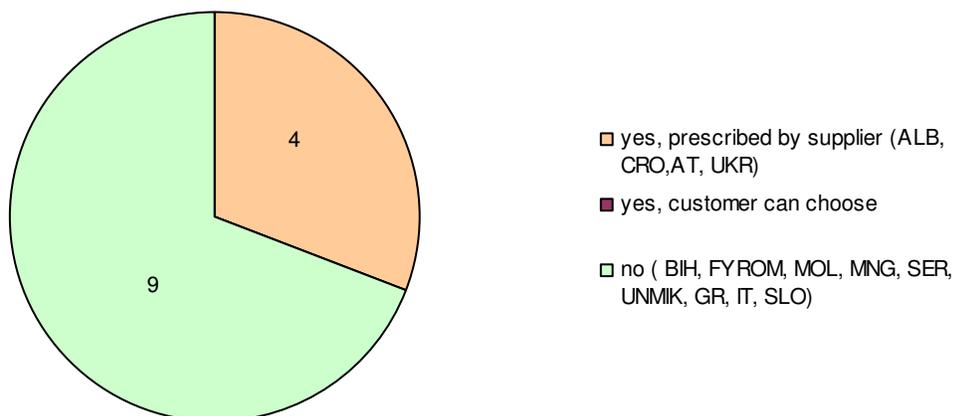
Figure 8 How often is the bill sent to customers?



2.15 Is payment based on instalments?

Overall, **in only 4 out of 13 cases** payment is based on instalments. In all of these cases customers can not decide on this option but payment based on instalments is prescribed by the supplier. In 4 additional cases the payment may in exceptional cases also be based on instalments, for example in case of high debt (Serbia and Greece), wrong bill (Moldova) or other specific cases defined by the regulator (Italy). Not including these special cases, in 9 markets the customer cannot pay his bill based on instalments.

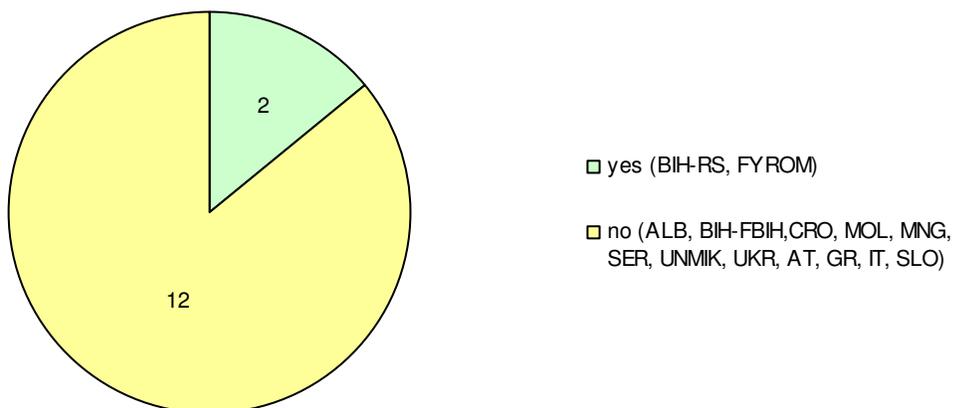
Figure 9 Is payment of the bill based on instalments?



2.16 Does the bill indicate information about potential savings or increased costs of electricity supply?

In general, the electricity bill does not indicate information about potential savings or increased costs of electricity supply, in 12 out of 14 cases. In former Yugoslav Republic of Macedonia, however, a separate information sheet including advice for electricity savings is attached to the bill from time to time. In Bosnia and Herzegovina (Republika Srpska) the supplier sends information about his request for price change to all customers, usually on the back of the bill.

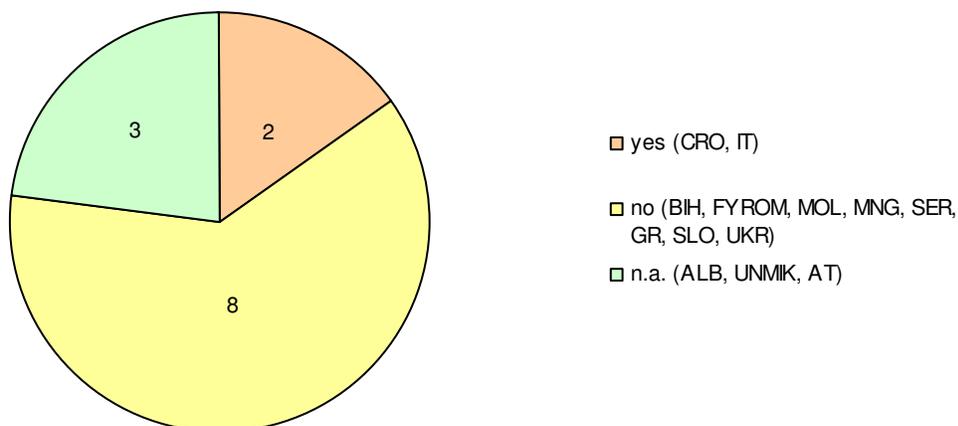
Figure 10 Does the bill indicate information about potential savings or increased costs of electricity supply?



2.17 If meter reading and billing is carried out more frequently than the reading and billing prescribed by the tariff system, are the customers charged with extra costs?

In general, customers are **not charged** extra cost if meter reading and billing is carried out more frequently than it is prescribed by the legislative act, regulating the period, e.g. tariff system. This is valid in 8 out of 13 cases. In Croatia and Italy the special service of additional meter reading is extra charged. In Albania, UNMIK and Austria the option to read and bill more frequently than prescribed does not exist.

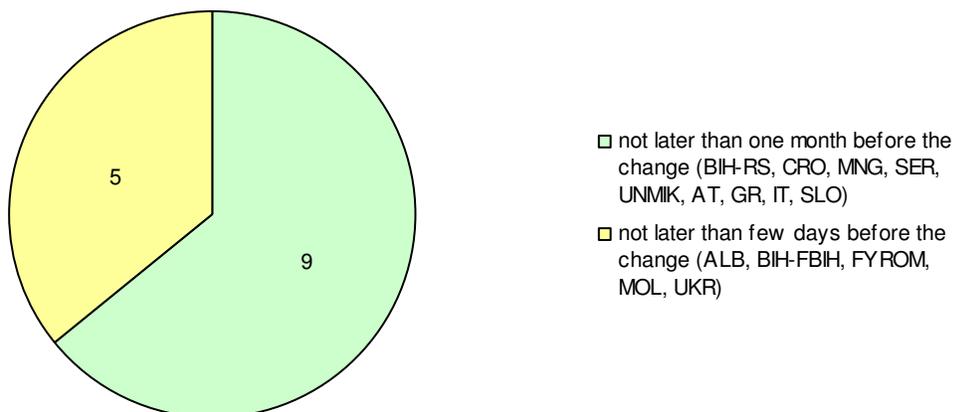
Figure 11 If meter reading and billing is carried out more frequently than the reading and billing prescribed by the tariff system, are the customers charged with extra costs?



2.18 How many days/months in advance are customers informed about the changes in electricity rates?

Generally, customers in all analyzed markets are informed on the changes in electricity rates in advance, but in 5 out of 14 cases they are only informed not later than a few days before the change takes place. The other 9 out of 14 cases show a more customer friendly announcement period- the customers are informed not later than one month before the change is enforced.

Figure 12 How many days/months in advance are customers informed about the changes in electricity rates?

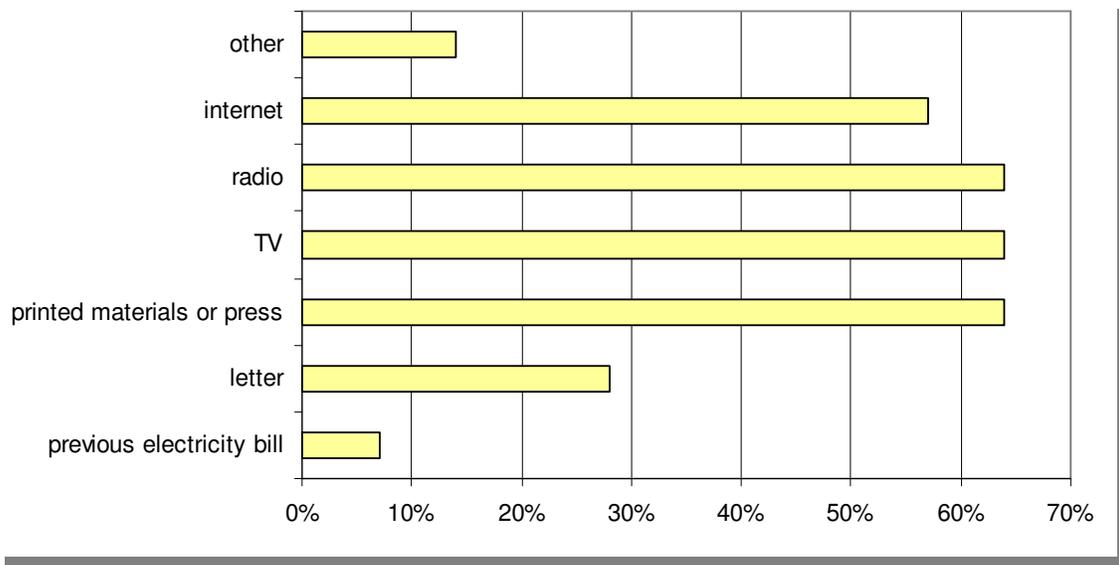


2.19 How are customers informed about the changes in electricity rates?

Regarding the means of informing the customers on the changes in electricity rates in advance, only customers in Italy are informed via the electricity bill issued before the envisaged price change. Also in Italy, if the price change is a result of an automatic indexation, customers are informed only after the relevant change.

In other electricity markets the media (press, TV and radio) are the most frequently used means of informing customers. The figure below presents the usage level of different means of informing customers in analyzed markets.

Figure 13 Means used for informing the customers about the change in electricity rates

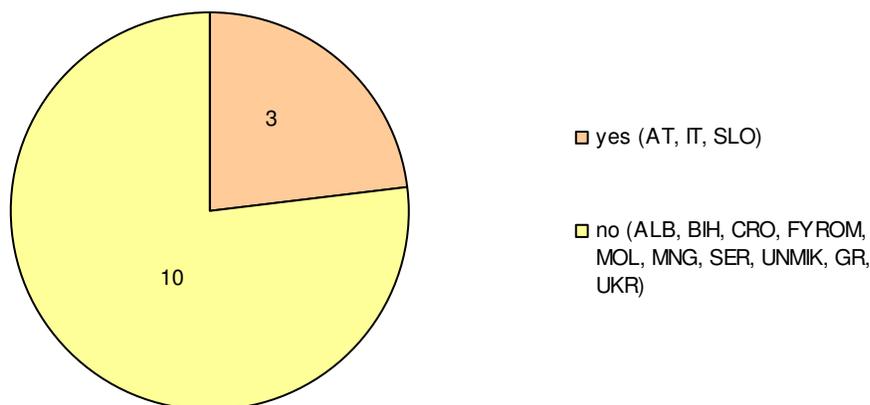


During the preparation of the present report regulators were asked to express their own view on the most appropriate means of communication with customers. The Italian regulator suggested that customers should be informed on change of electricity rates 3 months in advance except in case of automatic indexation clause in the supply contract.

2.20 Are customers informed about different products?

Customers are informed about the different products available by the suppliers in only 3 markets, all of them being EU Member States. In 3 Contracting Parties the suppliers advertise their products on their web sites but do not specifically inform their customers or send related information to customers. In this light, the regulator of Bosnia and Herzegovina-Federation BIH suggested that suppliers should inform costumers on all products and services using different tools (more than one) in order to keep customers properly informed.

Figure 14 Are customers informed about different products?



2.21 Are customers informed about the amount of money they have not paid yet?

The customers in **all** investigated markets are informed on the amount of money they have not paid yet.

2.22 Are customers informed about the procedure in case of non-payment?

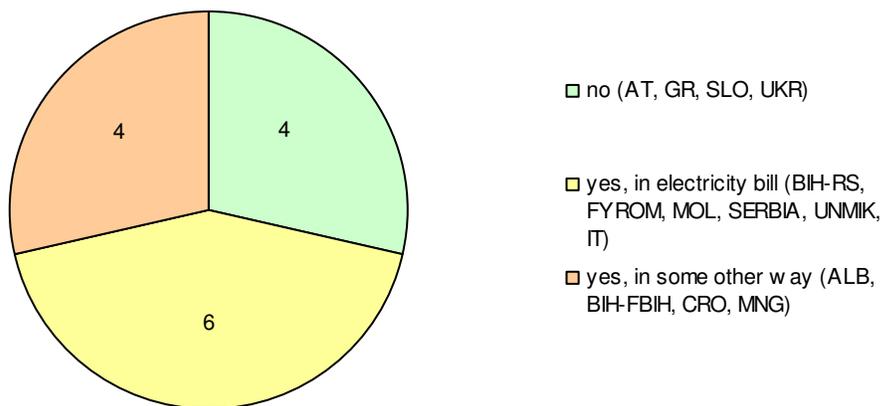
In **all** analyzed electricity markets the customers are informed on the procedure in case of non-payment.

2.23 Are customers informed about their rights to complain?

Proper protection of customer rights does not only require information on the right to choose the supplier and transparent billing but customers also need to be made aware of their right to issue complaints.

The analysis very positively shows that customers are informed about their rights to complain in **all** Contracting Parties. More specific information is provided in one EU Member State (Italy). The most common means of informing customers is the electricity bill (6 out of 14 cases). Other means involve information included in the rulebook on general conditions for supply, the supply contract, suppliers' and regulators' websites and the media.

Figure 15 Are customers informed about their rights to complain?

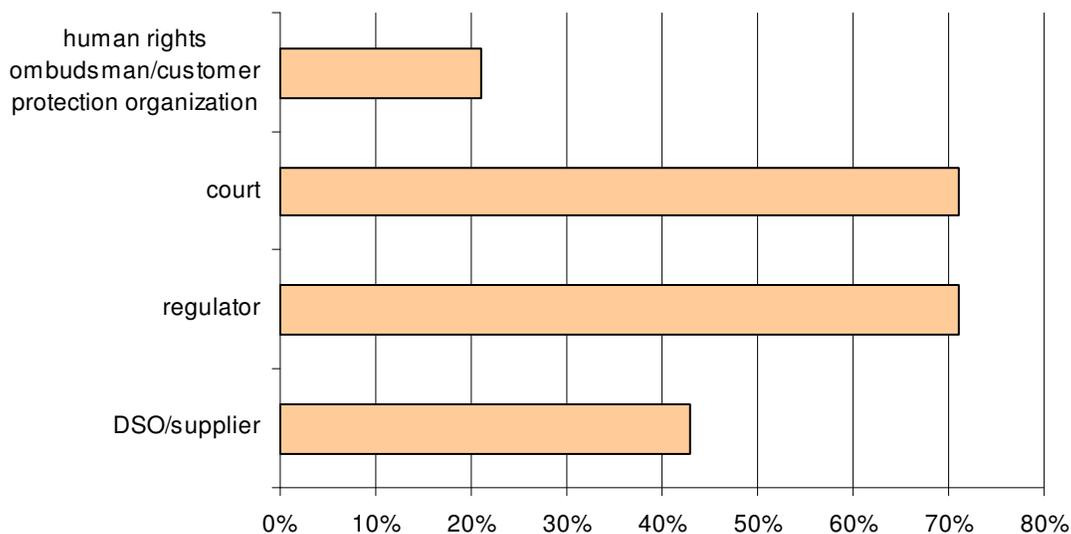


2.24 Which institution is in charge of dispute settlement?

Complaint handling can be allocated with different bodies. Aside complaint handling units with the supplier or network operator, regulators play an important role in this respect. The Energy Community acquis – namely Directive 2003/ 54/EC on electricity and Directive 2003/ 55/EC on gas foresee an obligatory dispute settlement function to be established with the regulator.

Generally, the institutions for dispute settlement **vary pretty** much among the different electricity markets and are mostly set up as a combination of several instance levels. The figure below shows the implementation level of institutions applied in case of dispute settlement.

Figure 16 Institutions in charge of dispute settlement



In most cases (10 out of 14) the institution for dispute settlement is the regulator, in 3 out of these 10 cases the regulator is the only institution responsible for dispute settlement (Montenegro, UNMIK, Austria). It is very welcome to see that the judicial procedure is in no case the only way for dispute settlement.

The regulator of Federation of Bosnia and Herzegovina suggests that the ombudsman for customer protection should be actively involved in dispute settlement.

3 SUMMARY OF RESULTS AND CONCLUSIONS

The main results and conclusions drawn from the market analysis on electricity billing practises in the investigated markets is summarized as follows:

- The **role of the regulators related to defining the rules** on billing is remarkable: in general they strongly influence the rules on billing.
- The **role of regulators on monitoring** compliance with the rules on billing is also dominant in all analyzed markets.
- The electricity bill for household customers is issued separately from other services in most of the investigated cases. This shows that the billing process is already developed to relatively mature extent. In some markets the bill may also contain other goods or services - however the electricity part has to follow the regulator's requirements. Such approach is not in contradiction to the general rules on billing as long as transparency is guaranteed.
- In all markets the customers receive one bill for both electricity supplied and the network use. Again, this shows that **in almost all the investigated markets the interest of consumers is protected** as regards not being overloaded with two bills.
- In the broad majority of analyzed markets (12 out of 13 cases) the bill does **not** contain all the information from the "recommended bill", prepared by the European Commission, DG SANCO in September 2009.
- The content of the electricity bill is prescribed in most cases (in 9 cases). This clearly indicates that the subject, i.e. content of bills, is understood as **topic of major importance** in all investigated markets.
- In general, a **broad spectrum of information** can be found in the electricity bills. The customer's metering or connection point is well identified and the customer is defined by name and billing address¹⁹. There are, however, some minor differences which do not affect the customer identification.
- The **price and product data specified on the bill show the largest variety** among the analyzed markets. The only common content in all analyzed markets is the total consumption and payable amount excluding and including VAT. Energy product specification – such as fuel mix – is not widely displayed in the electricity bills of the investigated markets, with the exception of the analyzed EU countries. The same is true for the **differentiation** between transmission and distribution charges and supply service related costs in the electricity bill. Capacity charges are recognized as part of household electricity bill in only 7 markets.
- The **metering related data shows relatively common results**: actual meter reading and the amount billed is found on the bills of almost all the markets. Also the estimated amount billed is available in majority of cases.

¹⁹ Except for one case where the address relates to the point of delivery.

- Data on **contribution of energy sources to the fuel mix** is not specified in most of the investigated markets. Only in 2 EU countries such information is available from the electricity bill.
- Data on the amount of **electricity consumed in the previous year or billing period** is displayed in only 5 cases.
- In the majority of cases (10 out of 13) at least one, in 8 out of 13 at least two useful **contact data** – be it emergency number, hotline contact and contact hours and/or the name and contact of the network operator – are available from the bill.
- The electricity bill in general consists of 2 **pages** (8 out of 14 cases). In 5 of the remaining 6 cases the bill consists of one single page and in one case of 3 pages. The regulators had the opportunity to suggest the number of pages. Only 3 out of 14 regulators used this to suggest exactly the number of pages as used in their jurisdiction.
- In general (9 out of 14 cases) customer can **compare the billed and metered consumption** if they have access to their own private meter reading. The values, however, cannot be verified at any time.
- Customers cannot choose the **form of billing**, namely electronic or paper form, except for 2 EU countries where the customers are given the choice between paper and electronic form and they also are informed on the costs related to the different options.
- Regarding the **choice of payment methods**, in most cases (12 out of 14) customers can choose between at least two methods, one of them being payment on invoice. In the 2 cases where no choice is given, it is assumed that payment on invoice is the only method. Among the markets where various payment options exist, the electricity bill in most cases serves as source of information on the payment options.
- In most investigated markets (8 out of 13) the bill is **sent monthly** to the customers. In the other markets the bill is sent either bi-monthly, every six months or the issuing frequency is determined by supply contract. In one EU country the bill is issued once per year.
- In only few cases (4 out of 13) payment is based on **installments**, prescribed by the supplier. In 4 other cases payment may in exceptional cases be based on installments.
- In general, the electricity bill does not indicate information about **potential savings or increased costs** of electricity supply (12 out of 14 cases).
- In most of the analyzed markets customers are not charged with **extra cost** if meter reading and billing is carried out more frequently than it is prescribed by the legislative act, regulating the billing period, e.g. tariff system (8 out of 13 cases). Only in 2 cases customers bear the additional costs of this specific service.
- Generally, customers in the majority of markets are informed about the **changes in electricity rates** in advance, mainly one month before the change. Certainly, this can be characterized as customer friendly approach. Only in 5 out of 14 cases the customers are informed only a few days before the change. In one EU country customers may have an automatic indexation clause in their supply contracts. Only in one EU country customers are informed on the expected change via the previous electricity bill. The most common means of

informing customers on changes are TV, radio and/or internet, followed by press or printed information.

- Overall, customers are informed about the **different products** by the suppliers only in 3 cases (EU neighboring countries). In 3 Contracting Parties the suppliers advertise their products on their web sites but they do not specifically inform their customers.
- In all analyzed markets the customers are informed on the amount of money they have not paid yet (their **debt**).
- In all analyzed markets the customers are informed on the procedure **in case of non-payment**.
- Customers are informed about their **right to complain** in all Contracting Parties but only one EU country. The most common mean to inform customers on their right to complain is the electricity bill.
- Generally, the **institutions for dispute settlement vary** pretty much among the different electricity markets and are mostly set up as combination of several instance levels. In most he cases the institution for dispute settlement is the regulatory authority, sometimes being also the only institution in charge. It is very welcome to see that the judicial procedure is in no case the only way for dispute settlement.

4 RECOMMENDATIONS

- In general, the billing process is **well ruled and regulated** in the analyzed markets.
- The main recommendation therefore is to **keep the current state of performance as regards** the role of regulators, transparency, identification data, metering data and other pieces of information.
- It is further recommended to **maintain the good practice to use maximal 2 pages** for the monthly bill and the billing period of one month which is in line with a common good practice.
- From a **transparency** point of view it is of utmost importance that the payable amount is broken down to its components with a view to clearly show customers which products and services they pay for.
- With reference to the **price and product data** it is recommended to require the suppliers to inform the customers on the product data in order to gain transparent comparability criteria.
- The data on the **past consumption and contribution of energy sources and fuel mix** is not specified in most of the Contracting Parties. Even if this is not yet legally required, it is recommended to fulfill these requirements as soon as possible.
- Information on the **previous annual consumption** of energy is useful for the customers and serves as a basis for energy savings or efficient use of energy. It is therefore recommended to require that these data are periodically, e.g. at least once a year, included as the information on the bills.
- There is also some room for improvement when **comparing the amounts billed to the actual values**. It is expected that the general future trend towards smart metering will spread also to the Contracting Parties and verification of billed amounts as well as current consumption monitoring will be enabled.
- It is further recommended to better enable the customers to **choose the form of their bill**, i.e. paper or electronic form, as soon as reasonably achievable.
- It is encouraging that in most of the analyzed markets the customers are already allowed to select the **payment method** and it is recommended that the in the rest of them the activities leading to offering customers this option are accelerated.
- Special care has to be given to **payment based on installments**. It is recommended that installments are offered in special cases only. These are cases of (i) annual reconciliation bills when the payable amount exceeds a usual monthly amount, or (ii) when an accumulated debt exists or (iii) in other cases with payable amounts substantially higher than the usual monthly bill.
- Customers are informed on possible **price increases** in almost all cases appropriately in advance. In a few cases this happens only on a very short notice, but in almost no cases the electricity bill is used for informing the customers on this issue. It is therefore recommended that at latest the last monthly bill or, if appropriate, its appendix, contains also this information.



- It is observed that in the most of the investigated markets the customers are not informed on the **different products**, although sometimes the suppliers advertise their products. It is recommended that the bill contain either short information on different products and/or a reference where this information is available.
- Customers in most of the analyzed markets are informed on the **right to complain**. It is recommended that all the customers are informed about this right and also, that the electricity bill is used as one of the means for information.



ANNEX 1 – “RECOMMENDED BILL”

Source: Good practice guidance for billing- 2009, prepared by Working Group on billing for 2nd Citizens' Energy Forum, Annex 1 and Annex 2, if applicable

Annex 1: Template for regular bills (monthly, bimonthly, quarterly)

First page

Point of delivery box with technical information plus supplier's and billing address, EAN code

Comparability box

- Supplier name and contact details
- Duration of contract, including deadline to switch
- Energy product name e.g. tariff name and reference to detailed description (to be found in subsequent pages).
- Price €cent (other currencies) /KWh (with base price & variable elements and min/max price variations, if appropriate), other discounts
- Customer Switching Code
- Duration of contract (if applicable)
- Information telephone number (helpline, regulator's number, or other, emergency tel.)

Sum to be paid,
Meter reading(s)
Billing period
By when it has to be paid and payment method(s),
Indication whether this is actual or estimated bill



Second page

Tariff information:
name,
different tariff components: base price, variable elements etc.

Price breakdown:
e.g. energy consumption + network charge + tax + other contributions

Additional billing info and calculation based on consumption, if applicable:
fuel mix,
efficiency and green tips
Information telephone number (helpline, regulator's number, or other emergency tel.)



ANNEX 2: TEMPLATE FOR ANNUAL RECONCILIATION STATEMENTS

First page

Point of delivery box with technical information plus supplier's and billing address, EAN code

Comparability box

- Supplier name and contact details
- Duration of contract, including deadline to switch
- Energy product name e.g. tariff name and reference to detailed description (to be found in subsequent pages).
- Price €cent (other currencies) /KWh (with base price & variable elements and min/max price variations, if appropriate), other discounts
- Customer Switching Code
- Duration of contract (if applicable)
- Information telephone number (helpline, regulator's number, or other, emergency tel.)

Clear indication that this is a reconciliation bill

- The total amount of regular payments (including VAT) already made by the customer
- The debit/credit balance
- Whether the regular instalment needs to be recalculated, and how consumers can change the sum they pay.



Second and subsequent pages

Explanation of tariff:
name,
different tariff components: base price, variable element etc.

Price breakdown:
e.g. energy consumption + network charge + tax + other contributions

Total sum paid so far and history of payments in reference year

Actual meter reading data – history of values in reference year

Graphs and pie charts with history of consumption (reference year and previous years)

Additional billing info (supplier's energy mix, efficiency and green tips etc.)