

Examples of Instruments and Practices

Examples of instruments and practices in place in various Member States are set out below. This is not intended to be a comprehensive overview of all Member State instruments and practices. Policy measures are presented in Member State alphabetical order and do not represent a hierarchy in terms of preferred practices. The explanatory text for each heading is based on the scope of the examples that have been received. This document forms a package with Annexes 3 and 4 of the Vulnerable Consumer Working Group report; please refer to Annex 3 for an explanation of how the document may be used for policy development.

i) **Household Energy Efficiency**

Improving Housing Stock, Heating Systems and Household Appliances

The type of heating system used, the quality of the housing stock, and the (in)efficiency of household appliances can all impact household energy use. Enforcement of housing standards and building regulations are key to improving the quality of housing stock, especially in the private rental sector. Instruments to encourage investment in energy efficiency include subsidies for energy efficiency improvements and energy-efficient equipment (with the subsidies possibly rising for those on lower incomes). Existing schemes include energy supplier and DSO targets for installing energy efficiency measures, whereby customers repay the costs through their energy bills.

- Austria: energy efficiency subsidies: <http://www.umweltfoerderung.at/kpc/de/home/allefoerderungen/#energiesparen>
- France: subsidies for low-income home owners: <http://www.anah.fr/habitermieux.html>
- France: tax reduction for investments in energy saving: <http://www.economie.gouv.fr/cedef/economie-energie-credit-dimpot>
- GB: Energy Company Obligation - supplier obligation to deliver energy efficiency improvements to domestic consumers: <https://www.gov.uk/energy-company-obligation>
- Greece: energy efficiency subsidies: <http://exoikonomisi.ypeka.gr/>
- Italy: tax reduction for investments in energy saving: <http://www.ufficienzaenergetica.enea.it/edilizia/incentivi/>
- Italy: White Certificates: <http://www.gse.it/it/CertificatiBianchi/Pages/default.aspx>
- Portugal: energy efficiency measures for vulnerable consumers and social support NGOs: <http://www.edp.pt/pt/media/noticias/2013/Pages/EDPvaioferecertressistemasdemicrogeracaoalPSSs.aspx>

Home Visits

Free energy audits are sometimes available, as are energy "tutors" who help consumers to implement simple energy efficiency measures.

- Belgium/Flanders: DSO free energy audits: <http://www.vlaanderen.be/nl/bouwen-wonen-energie/energie/energiefactuur/energiescan>

- Belgium/Wallonia: energy tutors: <http://gouvernement.wallonie.be/les-tuteurs-nergie>

Social Housing and Incentives for Tenants and Landlords

Household energy efficiency can be impacted by factors such as the landlord-tenant dilemma (the "split" incentive). Policies thus focus on requiring property owners and public agencies to take responsibility for improving homes and installing more efficient heating systems. Actions for landlords include reduced tax rates for those that do invest, and providing an energy performance certificate to new tenants of rental property.

- Austria: mandatory energy performance certificate for each building: <https://www.help.gv.at/Portal.Node/hlpd/public/content/21/Seite.210400.html>
- France: landlords invest in energy efficiency measures: http://www.legifrance.gouv.fr/affichTexte.do;jsessionid=0A586CCEA18474FBCAC71A910767A1AE.tpdjo12v_3?cidTexte=JORFTEXT000021327445&dateTexte=20110920
- GB: Landlord's Energy Saving Allowance: <https://www.gov.uk/landlords-energy-saving-allowance>
- GB: Energy Act 2011 making it illegal from 2018 to rent a property below EPC rating E: <http://www.legislation.gov.uk/ukpga/2011/16/contents/enacted>
- GB: Energy Efficiency Standards for Social Housing in Scotland (incoming minimum of SAP 65 or 69 (depending on fuel source and housing type): <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/sustainable/standard>
- The Netherlands: Covenant on Energy Saving in the Rental Housing Sector: http://www.iut.nu/members/Europe/West/2012/WoonbondEnergyConvenant28_juni_2012.pdf

ii) Financial Support

Financial support - addressed through social policy - may be necessary where a high percentage of disposable income is needed to cover energy costs, where household incomes are low, or the household consists of a single parent, many children or a (full-time) carer. Those who are retired or unemployed may also require financial support. The state of the economy, especially at present with the ongoing financial and economic crisis, may also impact consumers' ability to pay, thereby also necessitating support. Financial support to vulnerable consumers should take into account all heating methods, not just electricity and gas.

- Austria: Electricity Assistance Fund: <http://www.verbund.com/cc/en/responsibility/corporate-citizenship/electricity-assistance-fund>
- Belgium: "dare to compare" campaign to stimulate consumers to compare energy providers' contracts: http://economie.fgov.be/nl/consument/Energie/Facture_energie/durf_vergelijken/#.UkmK1eSyHTo
- Hungary: home maintenance support for families in need, ensured by local municipalities: <http://csaladitudozo.kormany.hu/download/7/5c/60000/lakásfenntartási%20ámogatás%202013.doc>
- The Netherlands: social support: http://wetten.overheid.nl/BWBR0020031/geldigheidsdatum_11-10-2013

Winter and Cold Weather Payments

Practices and instruments in place include winter and cold weather payments for various consumer groups such as the elderly and disabled. However, these should ideally only be targeted at those who truly need financial support.

- Austria: Wiener Energieunterstützung (Viennese Energy Support) for energy advice, replacement of old appliances and financial aid; the latest comprehensive policy instrument to cover energy needs and costs of low-income households and other eligible households: <http://www.wien.gv.at/gesundheit/sozialabteilung/energieunterstuetzung.html>
- GB: Warm Home Discount scheme: <https://www.gov.uk/the-warm-home-discount-scheme>

Tariffs

Some Member States offer social tariffs to vulnerable consumers. One option is to offer progressive tariffs whereby the more energy a consumer uses, the higher the tariff s/he pays. Alternatively some Member States offer lower tariffs for consumers who have a high energy requirement, for example, 24/7 electrical equipment functioning. Time-of-use electricity tariffs are already available in some Member States to help consumers manage their consumption and bills; these will become more widely available as smart meters are rolled out.

- Belgium/Flanders (under development in Wallonia): a limited amount of free electricity for each household: <http://www.vreg.be/gratis-elektriciteit>
- Greece: social household tariff: <http://www.deddie.gr/default.aspx?id=31170&nt=19&lang=1>
- Hungary: discount for large families (3 or more children) on gas prices: <http://www.kormany.hu/hu/nemzeti-fejlesztési-miniszterium/hirek/egyszerubben-juthatnak-gazartamogatashoz-a-nagycsaladosok>
- Italy: social tariff for low-income families: http://www.autorita.energia.it/it/bonus_sociale.htm
- Portugal: social tariff: <http://www.edpsu.pt/pt/destaques/Pages/TarifaSocialAsece.aspx>
- Spain: social tariff on electricity: <http://www.minetur.gob.es/energia/tur/bonosocial/paginas/bonosocial.aspx>

Payment Planning

Not charging interest on late bill payments and no charges for payment issues may also assist consumers in vulnerable situations, as can assessing whether a consumer's bills are actually affordable for that household. People who do not meet the criteria for specific aid should not automatically be considered as bad debtors if they face difficulty in paying their energy bills. Other alternatives for supporting vulnerable consumers include social welfare centres negotiating better payment plans for consumers, and retailers taking the customer's ability to pay into account when setting debt repayment levels. Social benefit payments can be directed straight to the supplier (i.e. they do not actually reach the customer) where the customer is facing difficulty in paying the bills. Consumers in vulnerable situations should have a choice of tariffs available to them, regardless of limitations they may face in terms of payment methods etc.

- GB: suppliers have to offer a range of payment methods to consumers in debt. A licence requirement ensures that repayment plans reflect individual's ability to pay:
<https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/supplier-performance-social-obligations>
- Greece: beneficial arrangements for paying electricity bills for vulnerable customers:
<http://www.deddie.gr/Default.aspx?id=61056&nt=19&lang=1>
- Hungary: deferred payment or payment in instalment for indigent consumers
http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949
- The Netherlands: law on debt management schemes by municipalities:
http://wetten.overheid.nl/BWBR0031331/geldigheidsdatum_16-10-2013

iii) **Protection**

Consumers in vulnerable situations may need protection where there are, for example, low levels of competition or poorly functioning markets, poor debt policies and selling practices and/or pre-contractual practices, and insufficient choice in payment method. Consumers with health issues, a disability, the elderly or the very young may require additional support. Governance plays a large part in ensuring that the appropriate policy is in place to protect such consumers.

- Austria: Electricity Assistance Fund: <http://www.verbund.com/cc/en/responsibility/corporate-citizenship/electricity-assistance-fund>
- Belgium, France, GB: independent energy ombudsman
BE: <http://www.ombudsmanenergie.be/index.php?lang=fr>; FR: <http://www.energie-mediateur.fr/>;
GB: <http://www.ombudsman-services.org/energy.html>
- GB: Priority Services Register offers free services e.g. safety check of gas appliances:
http://www.adviceguide.org.uk/wales/consumer_w/consumer_energy_and_water_supply_e/consumer_energy_supply_e/consumer_help_if_youre_older_disabled_or_on_a_low_income_e/priority_services_register_for_older_and_disabled_people.htm
- Greece: procedures for resolving disputes between clients and suppliers through Hellenic Consumers' Ombudsman: <http://www.synigoroskatanaloti.gr/>
- Hungary: additional services for disabled people for metering, reading and billing procedures or payment terms. Non-interruptible supply for disabled consumers whose life is endangered by disconnection from electricity supply (vital electric equipment)
http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949
- Portugal: independent client ombudsman: <https://provedordocliente.edp.pt/>

Competition

Practices and instruments that may help vulnerable consumers include improving market functioning and increasing competition through liberalisation, the introduction of interconnectors between Member States etc. A level playing field is necessary in energy markets to avoid incumbents having an (unfair) advantage. NRAs should monitor competition and the position of incumbents.

Selling Methods

Selling methods (telephone and doorstep sales, for example) are sometimes tightly regulated. In some Member States, suppliers have signed up to voluntary codes of good conduct; indeed industry self-regulation can result in positive practices vis-à-vis vulnerable consumers.

- Belgium: code of good conduct: http://economie.fgov.be/fr/consommateurs/Energie/Facture_energie/Accord_protegeant_le_consommateur/#.UkmMEOSyHTo
- GB: voluntary code of practice and sales agent register: <http://www.energy-uk.org.uk/customers/energy-industry-codes/energysure-code.html>
- Italy: voluntary code of good conduct against unfair practices: <http://www.autorita.energia.it/it/schede/C/faq-contrattinr.htm>
- The Netherlands: voluntary code of conduct on providing information and fair selling: <http://www.energie-nederland.nl/gedragscode-consument-en-energieleverancier/>
- The Netherlands: energy supplier voluntary agreement with debt service organisations: <http://www.nvvk.eu/schuldhelpverlening/Convenanten>

Consumer Awareness

In some Member States, the onus is on consumers to ensure the relevant authorities know about their vulnerable status, but consumers are not always aware of their entitlements or that they qualify to receive benefits. Equally, energy suppliers are not able to assist vulnerable consumers if they are not aware of their individual circumstances. Different forms of advice, provided by different bodies, to raise consumer awareness could be one approach to this issue.

- UK Energy Best Deal Campaign provides advice to vulnerable consumers <https://www.ofgem.gov.uk/ofgem-publications/38138/energybestdealbookleteng2012.pdf>

iv) Information and Engagement

This is partially the responsibility of the energy retailers as they tend to be the main point of contact for the consumer, and partially that of Government and other bodies. In addition to the communication work undertaken by the energy companies, NRAs and consumer associations can provide free advice etc. However, lack of access to appropriate media such as the internet may still mean that vulnerable consumers lose out. In addition, lack of education may impact an individual's ability to follow developments and/or make appropriate choices in the energy sector, requiring additional support. Immigrants and ethnic minority citizens may face language barriers, necessitating translation of information into the relevant language(s).

- GB: Citizens Advice Consumer Service (Government-funded helpline for energy consumers): http://www.adviceguide.org.uk/england/consumer_e/consumer_energy_and_water_supply_e/consomer_energy_supply_e/consumer_choosing_and_switching_supplier_e.htm

- GB: helpline for energy savings advice: <http://www.energysavingtrust.org.uk/Organisations/Government-and-local-programmes/Programmes-we-deliver/Energy-Saving-Advice-Service>
- GB: suppliers have set up a Home Heat Helpline: <http://www.homeheathelpline.org.uk/>
- The Netherlands: consumer information and practical help on energy topics: <http://www.consuwijzer.nl/energie>

Transparency and Billing

Improved transparency on the composition of consumers' bills raises the level of customer awareness. It helps if consumers are aware of how much of the final bill relates to the cost of energy supplied, for example, to assess whether switching is worthwhile. Good practices and instruments in place include the transparent provision of clear and simple bills via different media.

- Austria: specimen bill and compulsory billing information: <http://www.e-control.at/de/konsumenten/strom/stromrechnung>
- France: compulsory billing information (details for complaints, disputes, ombudsman etc.): http://www.legifrance.gouv.fr/jopdf/common/jo_pdf.jsp?numJO=0&dateJO=20120426&numTexte=31&pageDebut=07448&pageFin=07450
- GB: voluntary code of practice to ensure accurate billing: <http://www.energy-uk.org.uk/customers/energy-industry-codes/code-of-practice-for-accurate-bills.html>
- GB: Priority Services Register offers free services e.g. large print and Braille bills, or bills sent to friend/relative: http://www.adviceguide.org.uk/wales/consumer_w/consumer_energy_and_water_supply_e/consumer_energy_supply_e/consumer_help_if_youre_older_disabled_or_on_a_low_income_e/priority_services_register_for_older_and_disabled_people.htm
- Hungary: compulsory billing information; bills include supplier/distributor contact details; assistance with meter readings and understanding bills for disabled people: http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949;
- The Netherlands: voluntary agreement with regulator to make energy bills understandable: <https://www.acm.nl/nl/publicaties/publicatie/5446/NMa-presenteert-richtlijn-voor-betere-energienotas/>

Price Comparison Tools and Switching

Price comparison tools are increasing in popularity as a means for all consumers to find and switch to the best, most appropriate tariff. This should also benefit vulnerable consumers (even if they do not switch) as it encourages competition.

- Austria: NRA Tarifikalkulator: http://www.e-control.at/de/konsumenten/service-und-beratung/toolbox/tarifkalkulator/tarifkalkulator-application?sav_ref=http://www.e-control.at/en/consumers&js=1&sw=1600
- Belgium: price comparison tools:
 - Brussels: <http://www.brusim.be/>
 - Flanders: <http://www.vreg.be/vergelijk-doe-de-v-test-en-vind-uw-ideale-leverancier>

- Wallonia: <http://www.cwape.be/?dir=2.1.02>
- Finland: NRA price comparison tool: www.sahkonhinta.fi
- France: free telephone information service; website including price comparison tool: <http://www.energie-info.fr/>
- GB: NRA Confidence Code for online price comparison sites: <https://www.ofgem.gov.uk/information-consumers/domestic-consumers/switching-your-energy-supplier/confidence-code>
- Greece: price comparison and information related to electricity bills: http://www.rae.gr/site/categories_new/electricity/market/supply/invoice/info.csp?viewMode=normal
- The Netherlands: examples of privately-owned price comparison websites: <http://www.DeEnergiegids.nl> ; <http://www.Easyswitch.nl> ; <http://www.Energieleveranciers.nl> ; <http://www.Energieplaza.nl> ; <http://www.Energieprijzen.nl> ; <http://www.Energierekeningen.nl> ; <http://www.Energieverbruiker.nl> ; <http://www.Energievergelijker.nl> ; <http://www.Energiewereld.nl> ; <http://www.Gaslicht.com> ; <http://www.Prizewize.nl> ; <http://www.Totaalwijzer.nl>
- The Netherlands: price comparison tools provided by consumer organisations: <https://www.consumentenbond.nl/test/woning-huishouden/woning/energieleveranciers/overstapservice-energie/> and <http://www.eigenhuis.nl/tools/Energie/energieprijzenvergelijker/>
- Sweden: NRA price comparison tool: <http://www.ei.se/elpriskollen/>

Collective Switching

In addition to individual consumers switching supplier, collective switching schemes are being used to reduce the energy bill for groups of consumers; ideally vulnerable consumers will benefit from such schemes. Such schemes must comply with relevant regulations, and be transparent and correctly operated.

- Austria: 2013 collective switching by Verein für Konsumentenschutzinformation (VKI), the main consumer organisation in Austria: <https://www.energiekosten-stop.at/>
- The Netherlands: https://www.consumentenbond.nl/test/woning-huishouden/woning/energieleveranciers/energiecollectief-aanmelden/?actioncode=adwords&cid=sea_google_energie or <http://www.eigenhuis.nl/webwinkel/energie/collectieve-inkoop-energie/>

Single Point of Contact

Member States are introducing a single point of contact as required by EU legislation. This should assist vulnerable consumers if they need support, for example, the contact details can be provided in the energy bill.

- Italy: NRA is single point of contact: <http://www.autorita.energia.it/it/consumatori/reclami.htm>
- The Netherlands: www.consuwijzer.nl/energie
- Portugal: free telephone information service; website including price comparison tool: www.erse.pt

v) **Transparency and Information Sharing Between Stakeholders**

This could include, for example, data sharing between NRAs and the energy companies in the supply chain to ensure energy prices and bill components are monitored. The sharing of customer information (taking into account legislation on data protection) between energy retailers and other parties (DSO etc.) can be useful in maintaining up-to-date data on vulnerable consumers. The use of such data to create blacklists must be avoided.

- France: Fuel Poverty Observatory: <http://www2.ademe.fr/servlet/KBaseShow?sort=-1&cid=96&m=3&catid=25227>
- GB: Government's Fuel Poverty Advisory Group: <https://www.gov.uk/government/organisations/the-fuel-poverty-advisory-group>
- The Netherlands: energy supplier voluntary agreement with debt service organisations: <http://www.nvvk.eu/schuldhulpverlening/Convenanten>

Role of National Regulatory Authorities

The NRAs can monitor supplier practices, and undertake debt and disconnection reviews etc.

- GB: NRA's Consumer Vulnerability Strategy and social obligation reporting: <https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/protecting-vulnerable-consumers>
- GB: NRA monitors suppliers' performance against social obligations: <https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/supplier-performance-social-obligations>
- GB: gas and electricity supply market indicators: <https://www.ofgem.gov.uk/gas/retail-market/monitoring-data-and-statistics/electricity-and-gas-supply-market-indicators>
- Portugal: information is shared with the NRA: www.erse.pt

vi) **Physical Measures (Industry)**

Such measures can be used to ensure vulnerable consumers are not disconnected at critical times, such as in the winter or the summer depending on the climate. Some consumers need 24/7 energy provision for health reasons and thus need assurance that they will not be disconnected. Physical measures (such as prepayment meters if the tariffs are fair) can also be used to help consumers manage their bills in a transparent manner. Depending on their location, consumers may not have access to the gas grid and, in a few cases, to the electricity grid.

Disconnection

- France: minimum notice period before disconnection if bills are unpaid: <http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000019325694&fastPos=1&fastReqId=1811459339&categorieLien=cid&oldAction=rechTexte>

- GB: vulnerable consumers are protected from disconnection in winter months: <https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/supplier-performance-social-obligations>
- GB: voluntary agreement to never knowingly disconnect vulnerable customers: <http://www.energy-uk.org.uk/publication/finish/30-disconnection/308-era-safety-net.html>
- Hungary: minimum notice period before disconnection if bills are unpaid. Non-interruptible supply for those disabled consumers whose life is directly endangered by disconnection from electricity supply (vital electric equipment): http://njt.hu/cgi_bin/njt_doc.cgi?docid=110829.245949
- Italy: prevention of unexpected disconnections if bills are unpaid: http://www.autorita.energia.it/it/com_stampa/13/130222.htm
- The Netherlands: regulation of disconnection during winter months: http://wetten.overheid.nl/BWBR0030164/geldigheidsdatum_11-10-2013

Prepayment Meters

Practices and instruments used in the EU to support vulnerable consumers include the provision of prepayment meters.

Suppliers of Last Resort

Suppliers of last resort are also available in some Member States to ensure that consumers can always find a company to provide them with energy.

- Portugal: supplier of last resort: www.edpsu.pt

Grid Access

Work is being undertaken in some Member States to improve access to the grid for consumers living in remote locations.