



Commission for Energy Regulation

An Coimisiún um Rialáil Fuinnimh

Price Comparison Websites

Compliance Audit 2015

Information Note

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Commission for Energy Regulation

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1.0 Introduction

In [CER/11/057](#), the CER set out its decision to facilitate the development of price comparison tools and launch a framework for the accreditation of energy price comparison websites. In that paper, the CER noted that, in order to be able to identify the most competitive energy prices on the market, customers need access to accurate, reliable and transparent information, provided in an impartial manner by independent providers of price comparison services. To this end the CER in its 'Accreditation Framework for Price Comparison Websites' ([CER/11/144](#)) set out principles that price comparison websites must adhere to in order to receive and retain CER accreditation. These principles are summarised below and detailed in Annex 1:

1. Independence and Impartiality
2. Tariff and Price Comparisons
3. Calculation of Cost Comparisons
4. Accuracy and Tariff Updating
5. Website Filter Options and Results
6. Green Tariffs
7. Website Management
8. Consumer Information and Accessibility
9. Customer Service Ratings
10. Customer Care
11. Data Protection

In order to ensure continuous compliance with these principles, the accreditation framework requires price comparison websites to undergo an annual audit carried out by an independent auditor. The CER has so far accredited two price comparison websites: Bonkers.ie in March 2012 and uSwitch.ie in May 2013. Bonkers.ie underwent its first independent annual audit and the report was submitted to the CER in Q3 of 2013. The audit found that Bonkers.ie were in compliance with the CER accreditation principles and therefore were entitled to retain the CER accreditation for another 12 months. The findings of this audit were published in [CER/13/280](#).

In Q3 of this year, Bonkers.ie underwent its second independent annual audit and uSwitch.ie underwent its first annual independent audit. The purpose of this paper is to inform the public with regard to the findings of the annual compliance audit of www.bonkers.ie (Bonkers.ie) and www.uswitch.ie (uSwitch.ie).

For the purpose of this year's audit, the CER has approved Strata3 Ltd as the independent auditor for Bonkers.ie and Lightbox Digital Ltd for uSwitch.ie. The methodology used for the audit is detailed in Section 2.1 and the key findings are represented in Section 2.2. Section 3.0 sets out CER requirements and recommendations.

1.1 Relevant Documents

CER/11/057	Customer Protection in Deregulated Electricity Markets
CER/11/085	Consultation on Accreditation Process for Price Comparison Websites
CER/11/144	Decision on CER Accreditation Framework for Price Comparison Websites
CER/13/280	Bonkers.ie Price Comparison Website Compliance Audit 2013

1.2 Purpose of this paper

The purpose of this paper is to inform the public with regard to the findings of the independent audit of accredited price comparison websites and the CER's requirements and recommendations issued in light of these findings.

2.0 Compliance Audits

2.1 Methodology

Both price comparison websites were audited based on the principles of accreditation set out by the CER in the framework for the accreditation of price comparison websites, as outlined in the Decision Paper [CER/11/144](#).

The terms of reference and methodology for the audit were agreed between the CER and the independent auditors prior to the commencement of the audit period which covered 1st to 15th July for Bonkers.ie and 9th September to 23rd September for uSwitch.ie.

The methodology used to examine Bonkers.ie and uSwitch.ie for compliance with the accreditation framework included, inter alia, site visits at the premises of the website provider, regular and ad-hoc inspections of the website, cross-references to suppliers' websites, examination of the IT system and 12 test cases. The test cases were developed based on a combination of energy suppliers, fuel type, tariffs, consumption, methods of payment and supply

contracts. The structure of the test cases covers scenarios such as: urban electricity consumer on a standard tariff paying by cash / cheque, rural electricity consumer on a fixed contract paying by direct debit, dual fuel consumer with a night saver meter on an expired fixed contract, paying by direct debit and customers on Pay As You Go meters. These test cases are further detailed in Annex II and were approved by the CER as a representative sample for the purpose of the compliance audit. The results of price comparison calculations carried out by the auditors for each test case were cross-checked against the information as it appeared on the Bonkers.ie and uSwitch.ie results page.

2.2 Findings

The main findings of the two independent audits are summarised below and discussed in further detail in the last part of this section.

- In one test case, a price mismatch was found between the results of price comparison calculations as displayed on one price comparison website and the tariff information as it appeared on a supplier's website. This was caused by a manual input error related to the misapplication of the VAT rate. The discrepancy has since been remedied and the errant website provider has implemented a sign off procedure to prevent the repeat of such error in the future, which involves tariffs and charges being checked and signed off by two staff members and an additional accuracy check prior to being displayed on the website.
- A minor non-conformance in relation to website accessibility was found on both websites. The auditors noted that this was caused by a third party software and thus outside the control of the website providers. It was confirmed that this non-conformance does not impact on the functioning of the price comparison engine or the accepted level of accessibility.
- One auditor noted that the incumbents, Electric Ireland and Bord Gais Energy, are listed as default option for current electricity, respectively gas supplier. Noting that this was not in breach of the principles of the accreditation framework, the auditor recommended that the current electricity and gas supplier should not have a default option

The overall conclusion of the audits indicates that Bonkers.ie and uSwitch.ie remain in compliance with the CER current accreditation framework for price comparison websites and therefore are entitled to retain the CER accreditation for another 12 months. The auditors made

recommendations for CER's consideration, which are discussed later in this paper. The findings of the audits under each accreditation principle are discussed below.

1. Independence and Impartiality

Under this principle, the primary obligation of a price comparison website accredited by the CER is that it is independent and impartial, meaning that the website must not be owned by or affiliated with any energy supplier. In addition, the information contained throughout the website must be objective and unbiased.

The auditors were satisfied that the website providers are independent from energy suppliers and their affiliates and that the manner in which information contained on the websites is presented adheres to the requirements of the accreditation framework. It was noted that:

- the results page lists tariffs in order of highest estimated savings for every test case,
- the source of funding is disclosed to users in the About Us section of the websites,
- the home page and energy price comparison pages do not contain commercial advertisements from energy suppliers, and;
- energy suppliers' logos are proportionally of the same size

One auditor noted that Electric Ireland and Bord Gais Energy are listed as the default option for current electricity, respectively gas supplier. Noting that this was not a breach of the principles of the accreditation framework, the auditor found that it would be more appropriate that the current energy supplier option should not default in a specific supplier.

2. Tariff and Price Comparison

The main objective of this principle is to ensure that the results yielded by price comparisons are accurate, up to date and easily comparable. Of relevance here are the test cases used to examine the website for compliance with the requirements of this principle.

The compliance audits found that both Bonkers.ie and uSwitch.ie include all publically available tariffs offered by licensed energy suppliers and that the website providers have implemented rules in relation to default time periods, expiration of fixed supply contracts, dual fuel bundles and non-cash offers.

3. Calculation of Cost Comparisons

This principle sets out clear rules in relation to the components which are allowed to be included in price comparisons. For example, recurring discounts which are paid automatically (i.e. discounts for opting for a specific method of payment) should be included. Once off or non-price

offers, promotional discounts, discounts applying to services other than the supply of energy or discounts paid beyond the comparison period should not be included in price comparisons. As above, compliance with this principle was examined using test cases.

The auditors were satisfied that the price comparison websites were compliant with the requirements set out by this principle and noted that:

- the websites clearly identify fixed charges (i.e. annual standing charge, VAT, PSO, Carbon Tax) for each tariff option, where applicable. These charges are included in all energy bill estimations,
- calculations do not include discounts that apply to other services (i.e. boiler services), non-price offers and discounts paid beyond the default comparison period (i.e. 12 months),
- consumer's current tariff is displayed on the result page and accessible via a link to the current tariff details and calculations, and;
- tariff options that involve a fixed contract and messages alerting customers to potential termination fees are shown
- As stated in the introductory section, the methodology used to test both websites for compliance with the accreditation framework included 12 test cases. In one test case, a price mismatch was found between the results of price comparison calculations as displayed on one price comparison website and the tariff information as it appeared on a supplier's website. This was caused by a manual input error related to the misapplication of the VAT rate. The discrepancy has since been remedied and the errant website provider has implemented a sign off procedure to prevent the repeat of such error in the future, which involves tariffs and charges being checked and signed off by two staff members and an additional accuracy check prior to being displayed on the website.

4. Accuracy and Tariff Updating

Under this principle, accredited websites are required to update their database of tariffs on a regular basis. This is in order to ensure that the information accessed by consumers is as up to date and accurate as possible. The price comparison websites must display the date when the tariffs were last updated. In addition, this principle sets out rules in relation to the inclusion of new tariffs and suppliers.

The compliance audits found that the date of the last tariff update is clearly shown on both websites. The auditors noted that it was not possible to examine the price comparison websites for compliance in respect of the requirement placed on accredited price comparison websites to, where possible, add new tariffs/suppliers within two working days. This is because there were

no new tariffs or suppliers during the two audit periods. The same comment was made on the requirement not to include tariffs with a lead time in excess of four weeks in comparison calculations, as no such tariffs were on the market during the audit periods¹.

5. Website Filter Options and Results

This principle sets out rules in relation to the use of filters and the information contained on the results page.

The compliance reports indicated that Bonkers.ie and uSwitch.ie comply with the requirements of the accreditation framework under this heading. The main findings include:

- the results page displays the entire set of available tariffs and does not limit the results shown to the customer. The tariffs are ranked in ascending price order.
- fixed charges (i.e. VAT, PSO, Carbon Tax and the annual standing charge) are presented as annual charges and included in all final calculations.
- the results page shows the requirements of each tariff option, i.e. contract duration (if applicable), payment option, security deposit information, penalty charges.

6. Green Tariffs

This principle sets out rules in relation to the inclusion of green tariffs in price comparisons. The compliance audits confirmed that both websites include tariff offerings labelled 'green' by energy suppliers in cost comparisons. One website also lists the fuel mix for each tariff option listed, which is considered to be in line with the requirements of the accreditation framework.

7. Website Management

The requirements of this principle impose certain obligations on accredited website providers in relation to the management and maintenance of their website. The auditors' reports indicated that Bonkers.ie and uSwitch.ie are compliant with the requirements set out by this principle. The main findings under this heading are summarised below:

- the websites are managed and controlled by the owner company and use their own tariff database and calculator for price comparisons. The price comparison engine is not used by third party websites.
- the website providers retains full control over the information content and presentation.

¹ The next tariff change became publically known on 9th October and took place on 17th November 2014

8. Consumer Information and Accessibility

Under this principle, accredited website providers are required to endeavour that the information contained on the website is accessible and easy to understand by all energy consumers.

- The websites were examined for compliance with this principle using the W3C Validator tool or accessibility. A minor non-conformance in relation to website accessibility was found on both websites. The auditors noted that this was caused by a third party software and thus outside the control of the website providers. It was confirmed that this non-conformance does not impact on the functioning of the price comparison engine or the accepted level of accessibility.

The auditors were satisfied that Bonkers.ie and uSwitch.ie remain in compliance with the requirements of the accreditation framework.

9. Customer Service Ratings

Under this principle, accredited price comparison websites who wish to assign customer service ratings must first seek approval from the CER on the methodology used to assign such ratings. The auditors noted that the two accredited websites do not currently assign customer service ratings against suppliers or their tariffs.

10. Customer Care

This principle requires accredited price comparison websites to ensure that effective customer care procedures are implemented. The auditors were satisfied that Bonkers.ie and uSwitch.ie have implemented adequate customer care procedures, such as: the website displays a link to the CER Energy Customer team in an appropriate position and has a dedicated customer care contact system including an email address and/or a telephone number.

11. Data Protection

This principle imposes certain obligations in relation to the use of customer information. Having examined the website for compliance with this principle, the auditors found that the manner in which Bonkers.ie and uSwitch.ie handle consumer data in accordance with the requirements of Data Protection legislation with regard to the use of customer information. The website also displays a Privacy Policy, Terms of Use, Cookie Policy and Disclaimer.

3.0 Requirements and Recommendations

Having reviewed the results of the audit reports, the CER has issued the following requirements and recommendations:

3.1 Requirements

Price mismatch

In relation to the price mismatch outlined at point 3 Calculation of Cost Comparison above, the accreditation framework sets out the manner in which the CER will address situations where a price comparison website is found to be non-compliant with accreditation principles. Infringements are described in Annex 1 of [CER/11/144 Accreditation Framework for Price Comparison Websites](#). With respect to repeated infringements, the following apply:

- If a website provider is found to have infringed on a particular principle for two consecutive audits then they will receive a formal warning from the CER stating that a third infringement will be treated as a major infringement and dealt with accordingly.
- If a website provider is found to have six infringements within a one year period then they will receive a formal warning from the CER stating that any further infringements will be treated as a major infringement and dealt with accordingly.

The CER notes that this did not skew the ranking of energy suppliers on the website's result page. The discrepancy was brought to the attention of the errant website provider and an explanation was sought as to the reason for same. The matter was investigated and a report was returned within the required timelines, confirming that the price mismatch was due to human error related to the misapplication of the VAT rate. It was further confirmed that the error had been remedied and a sign off procedure involving two signatures and an additional accuracy check has been implemented to prevent such errors from occurring in the future. The CER is satisfied with the measures implemented by the website provider and will continue to monitor the website provider's compliance with the requirements of the Principle of Cost Calculation through ad-hoc and regular audits.

Requirement

In light of the price mismatch, the CER requested **both** website providers to review their internal processes and procedures to ensure that they are fit to safeguard the accuracy of price comparisons. The outcome of the review was submitted to the CER within required timelines.

In addition to the annual audit conducted by independent auditors, the CER carries out its own regular and ad-hoc audits. On foot of these audits, the CER has engaged with the website providers and the independent auditors on additional issues, including the sign up date and exclusive offers.

Sign up date

The sign up date refers to the date when a customer signed up to their current energy plan. Currently, only one accredited price comparison website requires users to confirm the sign up date. Albeit ascertaining the sign up date is not specifically required by the accreditation framework in its present format, the accreditation framework states clearly that “it is essential that consumers using an accredited price comparison website are given as up to date and accurate information on tariffs as possible”. Therefore, it may be argued that factoring the sign up date in comparison calculations leads to results that are more reflective of customers’ costs. This is due to the fact that the sign up date allows customers to determine, for example, whether the discount associated with that energy plan has expired.

Requirement

Having reviewed website providers’ and auditors’ viewpoints, the CER considers that, where the accredited price comparison website does not require users to confirm the sign up date, the website shall display a message in a prominent position alerting users that the results of the price comparison search depend on the date when they signed up to their current energy tariff.

Exclusive offers

These are offers presented by accredited price comparison websites in conjunction with energy suppliers. Recently, Bonkers.ie and uSwitch.ie have entered into bilateral agreements with energy suppliers to offer customers exclusive deals, such as extra discounts on residential gas and electricity tariffs and free remote heating controllers (please note that these offers may no longer be available). Customers can avail of these exclusive offers when switching through the websites. The exclusive offers presented on accredited price comparison websites may be classified as:

i. **Non-price offers (i.e. Bonkers.ie and SSE Airtricity)**

The exclusive deal between Bonkers.ie and SSE Airtricity offers customers a free remote heating controller (Climote) and free installation of same when signing up with SSE Airtricity on Bonkers.ie website.

ii. **Price offers (i.e. uSwitch.ie and Energia)**

The exclusive deal between uSwitch.ie and Energia offers dual fuel customers an extra 1% discount when they sign up online on uSwitch.ie website using the promotional code uSwitch. The 1% extra discount is offered in addition to the discount offered to all dual fuel customers who switch to Energia.

A question arises as to whether these exclusive deals are permissible under the current accreditation framework and, if they are, how they should be treated by accredited price comparison websites. Having checked the aforementioned exclusive deals for compliance with the relevant principle of the accreditation framework, we consider that non-price offers, meaning exclusive deals which do not impact on energy tariffs do not create a new tariff, thus not representing publically available tariffs. Therefore, accredited website providers are not required to include such offers in price comparison calculations. With respect to price-offers, meaning exclusive deals which impact on energy tariffs it is the CER's view that they represent in fact a new tariff. Principle 2.3. of the accreditation framework (Inclusion and Presentation of Tariffs) states that "the website provider must endeavour to include all tariffs offered by licensed suppliers that are available to the consumer, when presenting comparison results. If information on a tariff is publically available then it must be included by the website providers". Consequently, price-offers, namely those which create a new tariff, should be included in price comparison calculations by all accredited price comparison websites. We consider a tariff to be "publically available" if the tariff is displayed on the relevant supplier's website.

We expect that the continued development of competition in the retail energy markets will result in more deals of this nature being offered to energy customers via exclusive offers brought to customers via partnerships between a range of partners, including price comparison websites, and energy suppliers. In this context, we will continue to monitor similar future deals to ensure that they benefit energy customers while remaining compliant with the overarching principles of the accreditation framework. Should we determine, on foot of this monitoring, that such joint ventures adversely affect energy customers' confidence in using accredited price comparison websites, we will consider taking measured action on a case by case basis, including the imposition of a moratorium. Price comparison website providers are required to ensure that such offers are presented to customers in a transparent manner, supported by accurate and easy to understand information, so that customers' trust in using accredited price comparison websites is not negatively affected.

Exclusive offers, together with other matters pertaining to price comparison websites, will be included in the next review of the accreditation framework.

Requirement

Accredited price comparison website providers are not required to include non-price offers in price comparison calculations.

Accredited price comparison website providers are required to include price offers in price comparison calculations where these offers are publically available. We consider an offer or tariff to be "publically available" if the offer / tariff is displayed on the relevant supplier's website.

3.2 Recommendations

In addition to the requirements made on foot of the auditors' report and own audit processes, the CER has made the following recommendations with a view to enhancing impartiality, transparency and accessibility of information on accredited price comparison websites.

Default option

The CER notes the auditor's recommendation that Electric Ireland and Bord Gais Energy should not be listed as the default option for the current electricity, or gas supplier respectively. As stated in Section 2.2, this does not constitute a breach of the accreditation framework.

Recommendation

The auditor's recommendation has been brought to the attention of both website providers, who were asked to provide comments on the matter and examine whether the websites may be reconfigured to allow for the implementation of this recommendation.

Updating tariffs

We note the comments made by website providers in relation to the challenges posed by ensuring compliance with requirements relating to the updating of tariffs and that suppliers may not always keep them updated when changing energy tariffs or introducing new products. The CER acknowledges that currently suppliers are not required to communicate new energy tariffs or offers to accredited price comparison website providers. However, under Section 5 'Code of Practice on Marketing and Sign Up' of the Electricity and Gas Supplier's Handbook, suppliers

are required to display all publically available tariffs for household customers on their website. The onus is on the accredited websites to ensure that all publically available tariffs are included on their websites and, where possible, new tariffs/suppliers are added to the website within 2 working days of the details and confirmation date being made public. The CER notes that accredited website providers have already established good working relationships with most suppliers, supported by various communication channels.

Recommendation

We recommend that website providers improve on the efficiency and effectiveness of their working relationship with energy suppliers with a view to optimising the communication channels and establishing a clear framework for information transfer.

4.0 Conclusions and Next Steps

4.1 Conclusions

The independent auditors have completed the annual audit of compliance with the principles of the CER accreditation framework for price comparison websites in respect of Bonkers.ie and uSwitch.ie. Based on the findings of the two audits and the specific items set out above, we recommend that the CER accreditation for Bonkers.ie and uSwitch.ie is extended for another 12 months. In addition, we have issued requirements and made recommendations, as outlined in the previous section and recommend the implementation of same.

4.1 Next Steps

The CER is planning to consult on the review of the accreditation framework for price comparison websites in the second half of 2015.

ANNEX I - Principles of Accreditation

1 - Independence and Impartiality	
a -	Independent of any gas or electricity supplier or affiliate
b -	Information and data presented on the website is impartial
c -	Results should be presented in terms of best price
d -	Identification on the website that commission or payment is received from suppliers
e -	Does not recommend an alternative supplier if a consumer cannot automatically switch online to chosen supplier
f -	No advertisements from energy suppliers displayed on the home page or on the energy price comparison pages
2 - Tariffs and Price Comparisons	
a -	Includes all publically available tariffs offered by licensed suppliers
b -	Default time period set as one year
c -	Rules around tariff offerings that expire within the comparison period
d -	Gas and electricity base prices shown separately in a dual fuel bundle
e -	Details of non-cash offers listed separately to base prices
3 - Calculation of Cost Comparisons	
a -	Cost comparison calculation does not include:
	a1 - Introductory sign up offers, one-time discounts/special offers or other promotional discounts
	a2 - Discounts that apply to other services
	a3 - Non-price offers
	a4 - Any discount paid beyond comparison period
b -	Recurring discounts that are paid automatically are included
c -	Fixed charges included
d -	Details of a consumer's current tariff displayed on the results page
e -	Any termination fee customers will incur by switching from their current tariff shown
f -	Clear indication of any tariff option that includes a fixed term contract or termination fee
g -	Importance of entering accurate information in order to get the best comparison highlighted to consumers
4 - Accuracy and Updating Tariffs	
a -	Date the tariffs were last updated stated on the website
b -	Where possible new tariffs/suppliers added within two working day
c -	Tariffs with lead time in excess of four weeks are not be included
5 - Website Filter Options and Results	
a -	The results page lists at least 10 tariff options, with the cheapest presented first

b -	Includes VAT in the final costs	
c -	Consumers given the option to view all other tariffs beyond the initial page	
d -	Results page clearly shows the requirements of each tariff option	
e -	Filters offered to search results based on the different types of tariff as opt-in only	
f -	If filter available to show only tariffs to which the customer can switch by using the online links on the website, then:	
	f1 -	A clear statement in a prominent position at the top of the results page explaining what is shown
	f2 -	An option on the results page to expand the results to show all tariffs
	f3 -	This must not be the default position
g -	Impact of selecting an opt-in filter fully explained	
6 - Green Tariffs		
a -	Tariff offerings labelled green by suppliers included in cost comparisons	
b -	Filter offered for tariffs that suppliers define as green	
c -	Methodology used to list green tariffs included	
7 - Website management		
a -	Website provider manages and controls website and uses its own tariff database and calculator	
b -	Website provider retains full control over the information content and presentation	
c -	Cost comparison website maintained by a third party? If so:	
	c1 -	Third party may not manage another accredited cost comparison website.
d -	Approval given by CER where price comparison platform is used on 3rd party websites	
	d1 -	CER accreditation logo on 3rd party websites accompanied by the accredited websites logo
8 - Consumer Information and Accessibility		
a -	Explanation of the different payment methods shown	
b -	Plain English used	
c -	Website pages meet international best practice for accessibility	
d -	Website understandable and accessible to all energy consumers	
9 - Customers Service Ratings		
a -	Approval from the CER on the methodology used to assign customer service ratings	
10 - Customer Care		
a -	A link to www.energycustomers.ie displayed in an appropriate position on the website	
11 - Customer Care		
Data Protection		
a -	Compliant with Data Protection legislation	

ANNEX II – Test Cases

Test cases for 2014 Annual Audit – Bonkers.ie and USwitch.ie

Test case	Type of fuel	Current Supplier(s)	Type of meter	Supply Region (E)	Night Saver meter (E)	Method of payment
1	Electricity	Electric Ireland	Standard	Urban	No	Cash or cheque
2	Electricity	PrePayPower	Prepaid	Rural	Yes	Prepaid
3	Electricity	Bord Gáis Energy	Standard	Rural	No	Direct debit
4	Electricity	Energia	Standard	Rural	Yes	Direct debit
5	Gas	Bord Gáis Energy	Standard	n/a	n/a	Cash or cheque
6	Gas	Bord Gáis Energy	Prepaid	n/a	n/a	Prepaid
7	Gas	Flogas Natural Gas	Standard	n/a	n/a	Direct debit
8	Gas	Airtricity	Standard	n/a	n/a	Cash or cheque
9	Dual fuel	Bord Gáis Energy	Standard	Urban	No	Direct debit
10	Dual fuel	Airtricity	Standard	Rural	No	Cash or cheque
11	Dual fuel	Electric Ireland	Standard	Urban	Yes	Direct debit
12	Dual fuel	Airtricity	Standard	Rural	No	Direct debit

5,300 KWh represents the national average electricity consumption per annum

13,800 KWh represents the national average gas consumption per annum

Accreditation Compliance Report

1 - Independence and Impartiality	Frequency	Infringement	Compliant
a - Independent of any gas or electricity supplier or affiliate	Annual	Major	Yes/No
b - Information and data presented on the website is impartial	Regular	Major	Yes/No
c - Results should be presented in terms of best price	Regular	Major	Yes/No
d - Identification on the website that commission or payment is received from suppliers	Regular	Major	Yes/No
e - Does not recommend an alternative supplier if a consumer cannot automatically switch online to chosen supplier	Regular	Major	Yes/No
f - No advertisements from energy suppliers displayed on the home page or on the energy price comparison pages	Regular	Major	Yes/No
2 - Tariffs and Price Comparisons	Frequency	Infringement	Compliant
a - Includes all publicly available tariffs offered by licensed suppliers	Regular	Minor	Yes/No
b - Default time period set as one year	Regular	Minor	Yes/No
c - Rules around tariff offerings that expire within the comparison period	Regular	Minor	Yes/No
d - Gas and electricity base prices shown separately in a dual fuel bundle	Regular	Minor	Yes/No
e - Details of non-cash offers listed separately to base prices	Regular	Minor	Yes/No
3 - Calculation of Cost Comparisons	Frequency	Infringement	Compliant
a - Cost comparison calculation does not include:			
a1 - Introductory sign up offers, one-time discounts/special offers or other promotional discounts	Regular	Minor	Yes/No
a2 - Discounts that apply to other services	Regular	Minor	Yes/No
a3 - Non-price offers	Regular	Minor	Yes/No
a4 - Any discount paid beyond comparison period	Regular	Minor	Yes/No
b - Recurring discounts that are paid automatically are included	Regular	Minor	Yes/No
c - Fixed charges included	Regular	Minor	Yes/No
d - Details of a consumer's current tariff displayed on the results page	Regular	Minor	Yes/No
e - Any termination fee customers will incur by switching from their current tariff shown	Regular	Minor	Yes/No
f - Clear indication of any tariff option that includes a fixed term contract or termination fee	Regular	Major	Yes/No
g - Importance of entering accurate information in order to get the best comparison highlighted to consumers	Regular	Minor	Yes/No
4 - Accuracy and Updating Tariffs	Frequency	Infringement	Compliant
a - Date the tariffs were last updated stated on the website	Regular	Minor	Yes/No
b - Where possible new tariffs/suppliers added within two working day	Regular	Minor	Yes/No
c - Tariffs with lead time in excess of four weeks are not be included	Regular	Minor	Yes/No
5 - Website Filter Options and Results	Frequency	Infringement	Compliant
a - The results page lists at least 10 tariff options, with the cheapest presented first	Regular	Minor	Yes/No
b - Includes VAT in the final costs	Regular	Minor	Yes/No
c - Consumers given the option to view all other tariffs beyond the initial page	Regular	Minor	Yes/No
d - Results page clearly shows the requirements of each tariff option	Regular	Major	Yes/No
e - Filters offered to search results based on the different types of tariff as opt-in only	Regular	Minor	Yes/No
f - If filter available to show only tariffs to which the customer can switch by using the online links on the website, then:			
e1 - A clear statement in a prominent position at the top of the results page explaining what is shown	Regular	Minor	Yes/No
e2 - An option on the results page to expand the results to show all tariffs	Regular	Minor	Yes/No
e3 - This must not be the default position	Regular	Minor	Yes/No
g - Impact of selecting an opt-in filter fully explained	Regular	Minor	Yes/No
6 - Green Tariffs	Frequency	Infringement	Compliant
a - Tariff offerings labelled green by suppliers included in cost comparisons	Regular	Minor	Yes/No
b - Filter offered for tariffs that suppliers define as green	Regular	Minor	Yes/No
c - Methodology used to list green tariffs included	Regular	Minor	Yes/No
7 - Website management	Frequency	Infringement	Compliant
a - Website provider manages and controls website and uses its own tariff database and calculator	Annual	Major	Yes/No
b - Website provider retains full control over the information content and presentation	Annual	Major	Yes/No
c - Cost comparison website maintained by a third party? If so:			
c1 - Third party may not manage another accredited cost comparison website.	Annual	Major	Yes/No
d - Approval given by CER where price comparison platform is used on 3rd party websites	Regular	Major	Yes/No
d1 - CER accreditation logo on 3rd party websites accompanied by the accredited websites logo	Regular	Minor	Yes/No
8 - Consumer Information and Accessibility	Frequency	Infringement	Compliant
a - Explanation of the different payment methods shown	Regular	Minor	Yes/No