



An Coimisiún
um Rialáil Fóntais
**Commission for
Regulation of Utilities**

An Coimisiún um Rialáil Fóntais
Commission for Regulation of Utilities

Revised Accreditation Framework for Price Comparison Websites Decision Paper

Decision Paper

Reference: CRU/18268

Date Published: 25/03/2019

Executive Summary

In 2011, the CRU published a Decision Paper setting out the principles to be met by price comparison websites to receive accreditation from the CRU and demonstrate their independence, impartiality and accuracy in comparing electricity and gas prices offered by different suppliers. This Decision incorporated eleven principles which price comparison website providers must adhere to in order to be accredited by the CRU. The paper also set out the CRU’s decisions with regard to an annual auditing process to ensure that accredited websites continue to meet the required standards of the CRU’s accreditation framework.

Since that publication, there have been significant market developments including several new entrants to the electricity and gas retail market. To date, two price comparison websites have also been accredited and are being audited on an annual basis by the CRU.

The updates and decisions in this paper involve revisions to some existing requirements, such as the decision to require calculations for Estimated Annual Bills where price changes have been announced to incorporate both existing charges and charges due to come into effect, as well as the addition a number of new requirements, such as requiring legacy tariffs to be listed for comparisons. In many cases, the new requirements are practices that are already conducted by the price comparison websites. However, the introduction of these measures as obligations in the framework will ensure consistency across the market. All accredited providers are required to have these changes implemented no later than 31st March 2019. A summary of the decisions and revisions regarding the requirements is highlighted in the table below. The accreditation framework will also be published as a standalone document.

Along with the revised and added requirements, it was also decided to update the audit process to limit the number of audits conducted by the CRU to once per year and require price comparison websites to change auditors at least every three years. It has also been decided that the CRU will not audit against the old framework for 2018. Instead the CRU will bring forward the date of the 2019 audit to take account of the revised framework. Given the implementation date is 31st March, the CRU will conduct the 2018 in Q2 2019.

Principle	Decision	
Independence and Impartiality	1	Revision to Requirement 4 to require a table with supplier names and logos to identify all suppliers that the website provider receives commissions from.
	2	A requirement requiring price comparison websites to state from whom they receive commissions for exclusive offers.

Inclusion and Presentation on Tariffs	3	Revision to Requirement 2 requiring website providers to provide an option to compare offers over a longer time period than one year.
	4	Revision to Requirement 3 to include guidelines on the presentation of Estimated Annual Bills where price changes are due to come into effect, requiring a pro-rata calculation.
	5	Addition of a requirement on provision of information on legacy tariffs.
	6	A new requirement to display information concerning alternative payment methods.
Calculation of Price Comparisons	7	Revision to Requirement 8 to update the average annual consumption figures as determined by the CRU.
	8	Addition of a requirement to allow for a filter for cashback offers that are automatically deducted from customer's accounts. A revision of Requirement 1 and addition of a requirement to comply with the new cashback requirement.
Accuracy and Frequency of Tariff Updates	9	Addition of a new requirement concerning presentation of Estimated Annual Bills where price changes are due to come into effect.
	10	A new requirement to inform customers how Estimated Annual Price is calculated.
	11	A new requirement to provide information on how estimates of customer's potential savings for each offer are calculated.
Website Filter Options and Results	12	Revision to requirement 2 to include information on the PSO Levy and Carbon tax in price comparisons.
Green Tariffs	13	A new requirement for website providers to display fuel mix disclosures and a link to the CRU Pass through cost information paper.
Website Management	14	Revision to requirement 4 in relation to the use of the CRU logo on third party platforms.
Consumer Information and Accessibility	15	Additional requirement on provision of signposting to energy efficiency information on websites, naming SEAI as a reputable source of advice.
Customer Service Ratings	16	Additional requirement proposed in relation to any supplier ratings methodology that website providers may use, setting out that it should be evidence based and objective.
Data Protection	17	Revision to requirement 1 naming the General Data Protection Legislation.

Public/ Customer Impact Statement

Electricity and gas customers can use price comparison websites to compare both the prices and details of offers available from all suppliers in the market. Customers can enter information on their current supplier, their consumption or how much money they spend on electricity or gas and they will be presented with a comparison page listing the offers that they can switch to.

The CRU accredits price comparison websites in order to ensure that the information that they provide to customers is accurate, fully representative of the offers available in the electricity and gas markets and provided on an impartial basis. The CRU encourages customers to use accredited price comparison websites to compare offers for electricity and gas.

Price comparison websites that are easy to use and trusted by consumers are a valuable tool in delivering cost savings to consumers, reducing confusion about tariff offerings and promoting competition. They can assist customers in engaging with the electricity and gas retail markets.

Price comparison websites can help to compile information on unit charges, standing charges and other associated charges and provide information on potential cost savings based on a customer's current supplier and their level of consumption for electricity or gas. These websites must provide reliable, accurate and unbiased information to customers. The aim of the CRU's accreditation process is to provide credibility to price comparison websites and customer confidence in the service they provide along with the overall switching process. To date, two Price Comparison Websites have been accredited by the CRU; Bonkers.ie and Switcher.ie.

The purpose of this Decision Paper is to ensure that the accreditation process for price comparison websites is up to date and that the information provided to customers is transparent, accurate and unbiased.

This document states the CRU's final decisions regarding the proposals outlined in the consultation paper CRU/18/198 to set the standards of accreditation for price comparison websites.

Revisions

Version	Published	Update
1.0	21/12/2018	Original
1.1	25/03/2019	Update 5(e) in Checklist (missing word)

Table of Contents

Table of Contents	4
1. Introduction	6
1.1 Background.....	6
1.2 Related Documents	8
1.3 Structure of Paper	8
2. Accreditation Framework	10
2.1 Introduction.....	10
2.2 Independence and Impartiality	10
2.3 Inclusion and Presentation of Tariffs.....	15
2.4 Calculation of Price Comparisons	25
2.5 Accuracy and Updating Tariffs	31
2.6 Website Filter Options and Results	35
2.7 Green Tariffs	37
2.8 Website Management	39
2.9 Consumer Information and Accessibility	40
2.10 Customer Service Ratings	42
2.11 Customer Care	44
2.12 Data Protection.....	44
2.13 Future Principles	46
3. Audit Process	47
4. Summary of Decisions	49
5. Next Steps	53
6. Annex Revised Audit Checklist	54

Glossary of Terms and Abbreviations

Abbreviation or Term	Definition or Meaning
CRU	Commission for Regulation of Utilities
EAB	Estimated Annual Bill
EMD	Energy Management Device
PCW	Price Comparison Website
CEER	Council of European Energy Regulators
GDPR	General Data Protection Regulation

1. Introduction

1.1 Background

This document provides the decisions determined by the CRU following a number of proposals outlined in the recent Revised Accreditation Framework for Price Comparison Websites Consultation Paper (CRU/18/198) published on the 6th of September 2018. The Consultation Paper discussed proposed revisions to the framework price comparison websites must comply with to receive accreditation from the CRU. The framework was developed in to ensure comparison websites deliver accurate, reliable and transparent information to customers. In order to be accredited, a website must show that they have met specific principles as set out in the CRU's accreditation framework (CER/11/144). These principles are summarised below:

1. **Independence and Impartiality** - an accredited website must not be owned by or affiliated with any electricity or gas supplier. In addition, the manner in which information is presented on the price comparison website must adhere to certain principles of impartiality.
2. **Tariff and Price Comparisons** - an accredited website must provide consumers with as complete as possible picture of available tariffs.
3. **Calculation of Cost Comparisons** - the calculation of any price comparisons must give impartial results that provide consumers with clear and accurate information.
4. **Accuracy and Tariff Updating** - an accredited website must update its website regularly and make every effort to have the most up to date and accurate tariff information for price comparisons.
5. **Website Filter Options and Results** – an accredited website must provide consumers with a reasonable set of criteria to filter tariff results. Results presented to consumers must be comprehensive, accurate and ordered in the most appropriate manner.
6. **Green Tariffs** - an accredited website must adhere to specific principles set out for how green tariffs should be treated on accredited price comparison websites.
7. **Website Management** - an accredited website must maintain control over the management of its website, including the tariff information and comparison calculator.

8. **Consumer Information and Accessibility** - an accredited websites must be accessible and understandable for all energy consumers.
9. **Customer Service Ratings** -- an accredited website wishing to assign ratings to suppliers based on customer service must first seek approval from the CRU on the methodology used to assign ratings.
10. **Customer Care** - an accredited website must be consumer focused and must provide a link to www.energycustomers.ie, the CRU's website for electricity and natural gas consumers.
11. **Data Protection** - this principle places obligations on the website provider in relation to the use of customer information.

The CRU made its initial decision on the accreditation framework in 2011 (CER/11/144) in which requirements were developed under each of the above principles for price comparison websites to adhere to when conducting business. The CRU believes that it these price comparison websites are useful for customers to compare the range of products and services available in the markets and create a competitive market among suppliers.

The aim of the accreditation process is to provide credibility to price comparison websites and customer confidence in the service they provide along with the overall switching process.

The Consumer Survey of 2017 expressed the importance of effective price comparison websites. The results found that only about 40% of electricity customers and 43% of gas customers found it easy to compare offers in the market. One out of five consumers had “no understanding” when it came to comparing energy offers¹. This evidence supports the need for price comparison website's existence, to be able to help to the average consumer when they are looking to switch suppliers.

As shown by recent experiments carried out by the Economic and Social Research Institute on behalf of a number of organisations, including the CRU² customers can find it difficult to make the right choice when descriptions of products force them to think about too many parameters at once. Once customers have to take into account more than two or three factors at the same time, they can struggle to identify the best deal available. In this instance price comparison websites can be very useful to help customers choose the best deal for their consumption level.

¹ 2017 Consumer Survey Results – [CRU18071](#)

² See PRICE Lab: An Investigation of Consumer's Capabilities with Complex Products – [Price Lab](#)

The CRU has engaged with current price comparison websites and considered recent revisions to the CEER Guidelines of Good Practice on Comparison Tools to seek to enhance and update the existing Price Comparison Accreditation Framework. The CEER Guidelines of Good Practice on price comparison websites were published in 2012 and updated in December 2017. The GGP covers a number of areas, including independence of price comparison websites, transparency, exhaustiveness, clarity and comprehensibility, correctness and accuracy, user-friendliness, accessibility and customer empowerment. The decisions in this paper seek to enhance the current accreditation principles already in place for price comparison websites. This framework aims to provide customers with up to date information on offers and ranking of tariffs in the electricity and gas markets. It is hoped these amendments to the framework will provide meaningful benefits to customers availing of price comparison websites. The CRU has also revised this framework in the context of the evolving landscape of consumer rights and publication of the European Commission's New Deal for Consumers.

1.2 Related Documents

- Consultation on the Accreditation Process for Price Comparison Websites [CER11085](#)
- Decision on the Accreditation Process for Price Comparison Websites [CER11144](#)
- Customer Protection in the Deregulated Electricity Market [CER11057](#)
- Review of the Supplier's Handbook Decision Paper [CER17059](#)
- Electricity and Gas Supplier's Handbook April 2017 [CER17060](#)
- Consultation on a Revised Accreditation Framework for Price Comparison Websites [CRU18198](#)

Information on the CRU's role and relevant legislation can be found on the CRU's website at www.cru.ie

1.3 Structure of Paper

This paper sets out the decisions by the CRU in response to the consultation paper published for revisions to be applied to the current accreditation framework for price comparison websites. The responses for each of the proposed revisions will be discussed, followed by a discussion on the audit process to ensure that any accredited websites maintain the standards as set out in the accreditation process.

- **Section 1:** Provides background to the accreditation process, the competitive market and the proposals suggested in the recent consultation paper.
- **Section 2:** Outlines the proposed changes by the CRU to the accreditation framework, followed by a summary of the consultation responses and the CRU's decision concerning each proposal.
- **Section 3:** Explains the proposed minor amendments to the audit process, followed by a summary of the consultation responses and the CRU's decision concerning this process.
- **Section 4:** Summarises the decisions and the sets out a final revision of the proposed changes to the accreditation framework.

2. Accreditation Framework

2.1 Introduction

The CRU considers that it is essential for consumers to receive a fair and transparent service from accredited websites, both to facilitate an easy switching process that delivers customer's expected savings and to increase trust and engagement in the electricity and gas markets. Accreditation entitles a price comparison website to use the CRU logo on its website and to state that it is accredited to provide independent, impartial advice on energy plans.

This section of the decision paper will assess each of the individual proposals and the subsequent responses received. In total, the CRU received 6 responses to the consultation paper from both suppliers and comparison websites. The respondents are listed below:

- Just Energy
- Electric Ireland
- Bord Gáis Energy
- Switcher.ie
- Bonkers Money Ltd

One response was marked as confidential and will not be named or published with the rest of the responses along with this Decision Paper. The CRU would like to thank all respondents for their comments and feedback. The CRU has taken into account and considered representations when forming the decisions for the revised accreditation framework.

Several of the proposals saw little or no objection by the respondents (such as the use of the annual average figures of consumption set out by the CRU for comparison where a customer is unaware of their consumption amounts).

There were some requests on various proposals for further explanation by the CRU, or requests for CRU involvement by means of developing certain pricing methodologies or supplying a list of relevant entities which could provide advice for means of energy efficient behaviours. Each of these requests will be addressed in the relevant sections with a discussion of the CRU's views for the proposal.

2.2 Independence and Impartiality

A price comparison website must be independent of any energy supply companies to give users an impartial mechanism for consumers to use to compare market prices. The result is a price comparison website which is not owned or affiliated with any electricity or gas supplier and can provide impartial information for the user. There are also specific requirements in terms of the

commercial arrangements that a website provider enters and the way information is presented on the website.

2.2.1 Proposal One:

(a) Summary of Requested Feedback

Currently, the fourth requirement of the Independence and Impartiality Framework is written as:

“The website provider can enter agreements with suppliers to receive commission for switches carried out from their website, but this must not interfere with the delivery of independent and impartial price comparison results and information. In addition to this, the website providers must clearly identify on the website that it receives commission or payment from suppliers.”

The CEER updated their Guidelines for Good Practice for price comparison website, and based on their recommendations, an updated version of this requirement was proposed as:

Proposal 1:

4. The website provider can enter into agreements with suppliers to receive commission for switches carried out from their website, but this must not interfere with the delivery of independent and impartial price comparison results and information. In addition to this, the website providers must clearly identify on the website that it receives commission or payment from suppliers. A list on the website should identify all suppliers from whom the website provider receives a commission and this information should be easily accessible for website users.

(b) Summary of the Responses

Four of the respondents were in favour of requiring PCWs to provide information concerning payments received for commissions from suppliers stating that it would lead to an increased level of transparency. Electric Ireland and Switcher.ie both were in high agreement with the proposal, and Switcher.ie went further to state that they already provide a statement in their FAQ section conveying their commercial arrangements with suppliers, but they would be happy to expand on it.

Bord Gáis Energy also expanded on the suggestion with a number of additions. They first pointed out that while this information should be presented for transparency purposes, the PCW should continue to remain impartial and independent. Their suggestions to enhance the requirement were requesting the information be presented in a table format for simplified viewing in the ‘About Us’ section of the website, alongside a business model of the website to indicate the context of commission payments in the overall PCW strategy. However, no specific monetary values concerning the commission payments should be involved in the presentation and the table should

be updated within 3 business days where commissions are stopped being received, or any changes to the plans occur.

Just Energy suggested merging this requirement with the one presented in the next proposal. This will be further discussed in the section 2.2.2.

Bonkers,ie did not see the value in adding this information to their websites. They stated they are committed to “clear and transparent communications with [their] customers and to being 100% impartial,” and they already provide information as to how they sustain their business in the ‘About Us’ section, due to this promise and readily available information, they felt there would be no extra benefit by supplying the customer with information concerning commissions received by suppliers for switches conducted from their website.

(c) **CRU Response**

Under section 9BC(b) of the Electricity Regulation Act³ the CRU is required to protect the interest of consumers in the electricity market. This same requirement is placed on the CRU in section 6(3)(c) of the Gas Interim Act⁴ for gas customers. This requirement is linked to increasing transparency for customers who engage with these markets. Customers who sign up for an offer via a price comparison website or directly through a supplier’s website will pay the same price, but the CRU is of the view that it is important that customers understand the business model by which price comparison websites operate.

Therefore, the transparency of information should be easily accessible to customers, including aspects of commission payments received. This information should be presented in a simplified manner, and the CRU is in agreeance with the Bord Gáis suggestion that a table format be used to identify suppliers and their logos. However, to give a fair enough timespan to update the table and to finalise any deals with the supplier, the CRU feels that 3 days is too short of a notice to update this information on the suggested table and that a longer timeframe would be more suitable for PCWs.

As a result, the addition of this requirement into the revised framework would be a benefit to interested consumers who wish to make informed decisions concerning their electricity and gas supply.

³ Electricity Regulation Act (1999)

⁴ Gas (Interim) Act (2002)

(d) **CRU Decision**

The CRU's decision is to include this revision to requirement 4 for price comparison websites to include the names of suppliers from whom they receive commissions for sales conducted on their sites.

However, the CRU does note Bord Gáis Energy's comments concerning customers having an easier format to view this information, and thus price comparison websites should include a table with both names and logos of the suppliers who pay commissions to the PCW. The final decision is as stated below:

Decision 1:

*4. The website provider can enter into agreements with suppliers to receive commission for switches carried out from their website, but this must not interfere with the delivery of independent and impartial price comparison results and information. In addition to this, the website providers must clearly identify on the website that it receives commission or payment from suppliers. A **table on the website should identify all suppliers by both name and logo from whom the website provider receives a commission and this information should be easily accessible for website users. This table should be updated within 10 working days of any change of agreements of commissions between suppliers and Price Comparison Websites.***

2.2.2 Proposal Two

(a) **Summary of Feedback Requested**

Price Comparison Websites have developed a number of 'exclusive offers' with suppliers. There is currently no reference to these exclusive tariffs in the current accreditation framework. Within these offers, the websites show a tariff on their price list which is marked separately as exclusive and only offered for a limited time.

As price comparison websites are required to present independent and impartial price comparison results and information, the following requirement was proposed for PCWs to ensure compliance.

Proposal 2:

For any 'exclusive' offers displayed on a Price Comparison Website, website providers must clearly state whether they receive a payment or commission from suppliers in relation to such offers. This information should be easily accessible for website users.

(b) **Summary of Responses**

The responses for this addition were similar to those for the first proposal. Four respondents were in agreement with the proposal, with one having no opinion on the matter.

Both Electric Ireland and Switcher.ie agreed with the introduction of the requirement, with Switcher.ie stating again that although they already have a statement concerning commercial arrangements, they would be happy to expand to incorporate information pertaining to exclusive offers.

Just Energy again suggested merging this requirement with the requirement on commission payments. This would provide a single list for customers to avail of this information.

Bord Gáis formed an alternative view, saying the information should be contained separately, but it should be presented in a similar way with the supplier's names and logos available for viewing. They also suggested a footnote link to bring customers to this table.

Again, Bonkers.ie did not see any additional use in adding this requirement to the framework, believing that there would not be any extra benefit to the consumer by having this information. They state that they do engage in exclusive offer arrangements with suppliers, however they still remain 100% impartial, as failing to do so would lead to a breach of requirement.

(c) CRU Response

The CRU believes that adding this requirement to the existing framework would increase transparency to consumers and would provide additional benefits to interested consumers. However, it would require much additional work for the price comparison websites if they were required to update a table each time they engaged with a supplier on an exclusive offer. These contracts happen and change more often than commission agreements and would lead to cumbersome work for PCWs. Therefore, it is of the view of the CRU that information on exclusive offers be kept separate from the information concerning commission payments.

It would be beneficial to have this information on payments or commissions received presented alongside the exclusive offer, preferably through hover text (information that will appear when you hover the mouse over a certain location on the exclusive offer), or through information presented once you click on the exclusive offer.

(d) CRU Decision

The CRU's decision is to include the requirement concerning exclusive offers on price comparison websites. The presentation of the information should be in clear, and easily understandable language and should be easily accessible to consumers.

Decision 2:

For any 'exclusive' offers displayed on a Price Comparison Website, website providers must clearly state whether they receive a payment or commission from suppliers in relation to such offers.

2.3 Inclusion and Presentation of Tariffs

Price comparison websites should allow customers to make an informed choice on the electricity of gas tariff offer that is right for them. Any accredited website should provide customers with as complete as possible a picture of the tariffs currently available in the market.

2.3.1 Proposal Three

(a) Summary of Proposal

At this time the second requirement under the principle of Inclusion and Presentation of Tariffs reads:

"2. The website provider must use one year as its default timer period for price comparisons in line with the requirement, set out in the decision on Customer Protection, for suppliers to show annual consumption on each bill issued. However, they may provide the option for consumers to shorten or lengthen the period of time to conduct the comparison.

- *Standing charges must be shown as an annual charge, not as a daily or monthly charge. This approach must also be applied to any other fixed charge included in a supplier's tariff."*

It was proposed that this requirement is updated to reflect the methodology of presentation required by suppliers that is outlined in the 2017 revised Electricity and Gas Supplier Handbook. Under those requirements, presentation of the Estimated Annual Bill is required along with typical consumption figures.

The estimated annual bill must be calculated based on updated typical average consumption figures approved by the CRU and must include all energy costs such as unit rate, standing charge, PSO levy, etc. Monetary values attributed to non-energy related elements such as loyalty points, vouchers and cash-back offers should not be included.

It was also proposed that these comparisons of the Estimated Annual bill be extended beyond a year to incorporate for example retention rates offered by some suppliers which affect customers

after one year. Currently it is optional for price comparison websites to compare beyond a year. The proposed requirement is stated below.

Proposal 3:

1. *The website provider must use one year as its default time period for price comparisons, in line with the requirement, set out in the decision on Customer Protection, for suppliers to show annual consumption on each bill issued. However, website providers should provide an option to compare offers over a longer time period, including information on costs after year one.*

The Estimated Annual Bill as referenced in the Supplier Handbook should be displayed with all price comparisons, using typical annual consumption values as published by the CRU. Website Providers may provide the option for consumers to shorten or lengthen the period of time to conduct the comparison.

- *Standing charges must be shown as an annual charge, not as a daily or monthly charge. This approach must also be applied to any other fixed charge included in a supplier's tariff including *prepayment charges*.*

(b) Summary of Responses

In general, feedback from respondents was positive for this proposal, however various additional conditions were proposed to include with this revision to requirement 2.

For example, Just Energy expressed concern over the default comparison period being only one year. They stated that the majority of customers do not switch after one year, so having the default period for comparison be one year may be misleading to consumers. They felt it would be more appropriate to show the EAB over a two-year period to include retention rates of suppliers. It was suggested that this either be the default or presented next to the one-year EAB where the customer does not have to click anywhere to access this information.

Electric Ireland voiced another concern, stating that comparisons should not occur on less than an annual basis. As there are annual charges associated with each offer, it was a concern that comparing offers on less than a 12-month period would misconstrue the annual costs and mislead the customers.

Other respondents stressed the importance of the comparisons being on a like-for-like basis making sure the first year is not simply duplicated as the second year offer when the prices change to reflect retention rates. Bord Gáis was one of the respondents that voiced this concern, but also believed, if done correctly this could provide greater customer choice. They were also in agreement with the second part of the requirement concerning the EAB, however they felt it would be important

to change the wording of the requirement to incorporate standard terminology industry wide concerning the estimated annual consumption figures determined by the CRU.

Switcher.ie believes that this requirement is opposing the views expressed by the CRU regarding switching of customers. Switcher.ie states that allowing comparisons for over one year is not in the best interest of consumers as they would avail of better savings if they were to switch after one year. Therefore, they believe that it is not beneficial to display multi-year comparisons and express their comparisons as one year and monthly options.

Bonkers.ie had no issue with adopting this requirement, stating they already offer the option to compare tariffs on a one, two or three-year basis.

(c) CRU Response

The CRU has a responsibility to ensure that customers have access to information that is not misleading and is in their best interests stemming from the Electricity Regulation Act of 1999 and the Gas Interim Act of 2002 which was previously mentioned in section 2.2.1. Due to this, it is in the best interest of the CRU to encourage switching of suppliers, however, the CRU is aware that only 14% of electricity customers and 18% of gas customers switch on a yearly basis⁵.

This leads to the need to accurately depict the tariff options available to the many customers that do not switch after one year. The proposed requirement would benefit these customers by accurately showing their potential multi-year tariffs.

The customer would then be aware that their rates will go up after a year and they would be better off switching, however if they do not switch, they will be able to see which offer suits their choice the best. The tariffs will need to include the retention rates following the first year to avoid misleading customers.

In terms of making the default comparison more than one year, this would be misleading to customers as that would not present the best option. In almost all cases, the best option is for a customer to switch after one year, as many contracts being offered last 12 months, and the following year leads to increased retention rates and the termination of discounts being offered. Thus, one year presents the best default comparison timeline that would convey the CRU's message of switching.

⁵ Data was retrieved from the 2017 Electricity and Gas Retail Market Annual Report – [CRU18126](#)

The CRU also considers the concerns of comparing on a basis of less than one year as the requirement does not mention a minimum time frame. It is important for consumers to be aware of all the relevant charges of the offer. Comparing tariffs on a basis of less than one year might mislead customers to thinking they can purchase a plan for less than a year and not incur such penalties as early termination fees. Thus, it needs to be considered that if these offers are to be compared on a basis of less than one year the offer needs to be flagged if it has early cancellation fees.

(d) **CRU Decision**

The CRU's decision is to include the requirement to compare tariffs on a longer than one-year basis, however as some PCWs compare offers on less than a one-year basis, the proposal must be revised in order to protect consumers from misleading information. Thus it will be required where PCWs provide comparisons on a less than 12-month basis, a warning message must be present if the customer will incur early cancellation fees.

The decision will also be updated to reflect the correct terminology recommended by Bord Gáis concerning the average annual consumption figures for the EAB calculations.

Decision 3

- The website provider must use one year as its default time period for price comparisons, in line with the requirement, set out in the decision on Customer Protection, for suppliers to show annual consumption on each bill issued. However, website providers must provide an option to compare offers over a longer time period, including information on costs after year one. **Where offers are compared for less than 12 months, a warning message must appear if the offer has early termination fees.***

*The Estimated Annual Bill as referenced in the Supplier Handbook should be displayed with all price comparisons, **using the average annual consumption figures as determined by the CRU from time to time.** Website providers may provide the option for consumers to shorten or lengthen the period of time to conduct the comparison.*

- Standing charges must be shown as an annual charge, not as a daily or monthly charge. This approach must also be applied to any other fixed charge included in a supplier's tariff including **prepayment charges.***

2.3.2 Proposal Four

(a) **Summary of Proposal**

Currently, the third requirement under Inclusion and Presentation of Tariffs states:

“3. With regards to tariff offerings that expire within the comparison period of one year (or alternative period chosen by the consumer) the following principles apply:

- *If it is not possible to calculate savings over the comparison time period, including the details of the tariff that a consumer will be transferred to once the initial tariff offered expires, then the website provider may provide details of the tariff, however a warning message must alert the consumer to this fact.*
- *If the estimated savings are subject to a tariff that expires within the chosen time period, but the full cost for the period can be compared then the website provider may provide details of the tariff, however a warning message must alert the consumer to this fact.*
- *The warning message for the two options must include as a minimum:*
 - *The date that the tariff is due to end.*
 - *That the consumer will therefore be transferred to a different and possibly more expensive tariff after that date (further cost information on the new tariff should also be provided).*
 - *That the total cost provided in the comparison has taken into account a combination of the initial tariff rates up to the expiry date and the subsequent tariff rates after that date.*

It was proposed that the requirement was updated to ensure consumers are faced with clear and accurate information surrounding periods of price changes. Currently, price comparison websites provide information on price changes in different ways which is leading to different prices being presented for the same tariff on different websites where price changes have been announced by suppliers. Customers should be aware of upcoming price changes in a non-confusing framework, thus it was proposed to amend requirement three in the following way:

Proposal 4:

3. With regards to tariff offerings that expire *or price changes due to take effect* within the comparison period of one year (or alternative period chosen by the consumer) the following principles apply:

- *If it is not possible to calculate savings over the comparison period, including the details of the tariff that a consumer will be transferred to once the initial tariff offered expires, then the website provider may provide details of the tariff, however a warning message must alert the consumer to this fact.*
- *If the estimated savings are subject to a tariff that expires/*changes* within the chosen time period, but the full cost for the period can be compared then the website provider should provide details of the annual cost of the tariff for 12 months from the day of customer sign up. Within this calculation the website provider should include any price*

changes due to come into effect where they are available. A warning message should also alert the customer that the tariff is changing.

(b) Summary of Responses

This proposal was met with highly mixed responses from the industry. Just Energy was the only respondent in complete agreement with the proposal. Electric Ireland was hesitant to accept the full modification claiming price changes are very sensitive commercial data and they are a competitive issue. They expressed concern over requiring suppliers to provide information regarding price changes in advance of their effective date for business confidentiality issues.

Bord Gáis claims implementation of pro-rata change would be hard to implement. If the calculations not mirrored by all market participants (including PCWs and Suppliers) this will lead to inconsistencies between PCWs and Supplier websites. They believed a warning message that the tariff is due to change would be sufficient enough to inform customers of upcoming changes. They also expressed concern over the presentation of the two EABs, stating it would be confusing for customers. Overall, Bord Gáis did not agree with the addition of this requirement.

They did, however, agree with the proposed change to the warning message to state the date the change is due to come into effect, but they did not agree to the change on the warning message on the EAB.

Bonkers.ie expressed that the CRU needs to specifically outline a methodology for when price changes are announced. They state that different approaches are not in the consumer's best interest. If future price is not factored in, customers do not see accurate results or accurate saving amounts. This can lead to the customer choosing a 12-month binding contract that is based off misleading information. Bonkers.ie also believe that the pro-rate calculations should be able to be done by all PCWs, and that any failure of calculation should be due to missing information, not on inability to calculate the prices.

Switcher.ie had a high number of concerns regarding the revision of this requirement. Firstly, they believed that implementing a pro-rata calculation would be confusing to customers, as they would not be able to compare the tariffs on the PCW with the tariffs on the supplier's website. Switcher.ie then suggested that it would have to be mandatory for suppliers to provide PCWs with new pricing information within a set time period, or on the day the price change is announced. Finally, they recommended that a warning message be displayed where a supplier has announced a price change, to avoid confusion where one supplier may have made the announcement and another one has not or has yet to announce it. They then outlined a six-step process that would avoid the use of pro-rata calculations. Including steps to notify the CRU and the PCW advance notice of the price change, implement the change on the website within 2 working days of the announcement

without the use of pro-rata calculations, require that the supplier also update their website and finally the PCW would add a warning message to inform customers of the effective date of the price increase and that new rates are being used in their calculations.

(c) CRU Response

The CRU understands that implementing pro-rata calculations would alter the way that some PCWs display their tariffs where a new price change has been announced. However, it is necessary that information presented to customers is not misleading and to the best of the PCWs ability that it is accurate.

In terms of displaying information that is different from what consumers are seeing on a supplier's website, it is important to note that suppliers are not required to implement pro-rata calculation on their websites and cannot be required to do so until a revision has occurred and been consulted upon in the Supplier Handbook. PCW's also already to provide information that is different from supplier's websites in the form of exclusive offers which cannot be found on the supplier websites. If the information is flagged correctly regarding the price change that has been announced, the customers will be seeing accurate and non-misleading information and will be able to note that this calculation incorporates the price change whereas the one on the supplier website may not.

Some of the respondents felt that the CRU should be notified in advance of the price changes and subsequently, the PCWs should be notified shortly after. This also brought concern as this information can be seen as commercially sensitive data. Suppliers are supposed to provide an announcement a minimum of 30 days prior to a price increase regardless of notifying the CRU. These announcements must have specific information to consumers about the change due to requirements in the Supplier Handbook under section 4.4. PCWs should be able to use this information to correctly calculate new tariffs for customers. At this point, this information is publicly available and there should not be any concerns about privately held information.

As mentioned, Bord Gáis expressed the concern about the presenting two EABs, one based on the current tariffs and one based on the new calculations reflecting the price changes. As this would be present in the warning message about price changes, it would be clear to customers that one EAB would reflect current prices and one would reflect updated prices. It would be the responsibility of the PCW to make sure this distinction is apparent with the design of the warning message.

(d) CRU Decision

It is the decision of the CRU to revise this requirement at proposed. By amending this requirement, a consistent approach will be taken by all PCWs where price changes are announced, and customers will be able to accurately make decisions regarding their tariff choices. Without a

consistent approach being taken, different offers are being presented on different price comparison websites. As these sites are accredited by the CRU, the customer should feel confident that there is a consistent approach being taken that can be trusted. The final decision is presented below:

Decision 4:

3. *With regards to tariff offerings that expire or price changes due to take effect within the comparison period of one year (or alternative period chosen by the consumer) the following principles apply:*

- *If it is not possible to calculate savings over the comparison period, including the details of the tariff that a consumer will be transferred to once the initial tariff offered expires, then the website provider may provide details of the tariff, however a warning message must alert the consumer to this fact.*
- *If the estimated savings are subject to a tariff that expires/changes within the chosen time period, but the full cost for the period can be compared then the website provider should provide details of the annual cost of the tariff for 12 months from the day of customer sign up. Within this calculation the website provider should include any price changes due to come into effect where they are available. A warning message should also alert the customer that the tariff is changing.*
- *The warning message for the two options must include as a minimum:*
 - *The date that the tariff is due to end/for a price change to come into effect.*
 - *That the consumer will therefore be transferred to a different and possibly more expensive tariff after that date (further cost information on the new tariff should also be provided, including an Estimate Annual Bill calculated on the basis of both the current and impending tariff).*
 - *That the total cost provided in the comparison has taken into account a combination of the initial tariff rates up to the expiry date and the subsequent tariff rates after that date.*

2.3.3 Proposal Five

(a) Summary of Proposal

The addition of the following requirement was proposed to increase the level of information to customers who are on legacy tariffs, or tariffs that customers may still be on, but are no longer offered by the supplier. Customers who have been on the same tariff for some time and are looking to switch may not be able to calculate their savings if they are not presented with the option to compare the current tariff they are on with the new ones in the market. Thus, this requirement was posed for responses:

Proposal 5:

The website provider should, as far as reasonably possible, include information on legacy tariffs for the purpose of comparison if a customer is currently on a legacy tariff.

(b) Summary of Responses

Four of the respondents were in agreement with this proposal, both Switcher.ie and Bonkers.ie already stated that they currently list the details of the legacy tariffs for comparison on their websites.

Electric Ireland did express further concerns over confusing the customer with this information. They posed four questions for consideration by the CRU:

1. How is a legacy tariff defined? (Is this any prior tariff that a customer may have availed of with their current supplier or with a different supplier etc.?)
2. Will a customer be aware that they are on a legacy tariff?
3. Will adding such information confuse rather than inform a customer?
4. Would the website provider be required to provide all of the different information required for current offers? So should the website provider have to provide breakdown of the legacy tariff including any bonuses, discounts, etc. applicable at the time?

The CRU will address these questions in the following section.

(c) CRU Response

As mentioned when summarising this proposal, a legacy tariff is defined as a tariff a customer is currently signed up for which is no longer offered by the supplier. A legacy tariff will only have to be used if a customer is still on it, they would not be able to look back at previous tariffs they might have been on with other suppliers as this would result in the necessity to keep numerous amounts of records that do not currently impact the customer.

As legacy tariffs will only be used for comparisons, it will be noted by the customer that they are on a legacy tariff as they would not be able to select their own tariff for purchase.

It is not the belief by the CRU that adding this information will confuse customers. Customers can currently compare tariffs by entering information about what they are paying and what they currently consume and the results would only present the current tariffs in the market. The

customer would only be comparing using a legacy tariff if they are intentionally looking to compare against that tariff.

As the legacy tariff is used as a purpose for comparison, it should be broken down for customers to avail of this information if they want to make a like for like comparison for the current offers on the market with their existing tariff.

(d) CRU Decision

It is the CRU's decision to include this requirement into the accreditation framework for price comparison websites as written.

Decision 5:

The website provider should, as far as reasonably possible, include information on legacy tariffs for the purpose of comparison if a customer is currently on a legacy tariff.

2.3.4 Proposal Six

(a) Summary of Proposal

To reflect the changes in different payment methods, it was proposed to update relative notes on innovative tariffs such as level pay. This should be taken to mean that details of any new payment methods should be provided by comparison websites for information. The proposed requirement was:

Proposal 6:

Where an offer includes an alternative payment method to billing on a bi-monthly basis, such as level pay, or is based on changes in consumption, details of this should be listed separately.

(b) Summary of Responses

The CRU received no objections to the proposals. However, Bord Gáis did suggest adding more information surrounding the description of the payment options, suggesting a click-through link to a footnote on the price comparison's page to include further explanations of the tariff types based on wording provided by suppliers for the relevant offer.

Also, Electric Ireland emphasised the point that the rates should be applicable for the entire period of the offer and only applicable discounts be included in the offer where alternative payments are being made.

Switcher.ie and Bonkers.ie both stated they already present details for alternative payment methods where applicable.

(c) CRU Response

The CRU also believes that this requirement is useful to inform consumers of the innovative tariff options that are becoming available to them. So long as information is easily available and not misleading to customers it will be up to the discretion of the Price Comparison Websites as to how they provide this information on their pages.

(d) CRU Decision

The CRU's decision is to introduce this requirement as written into the revised framework for accreditation of Price Comparison Websites.

Decision 6:

Where an offer includes an alternative payment method to billing on a bi-monthly basis, such as level pay, or is based on changes in consumption, details of this should be listed separately.

2.4 Calculation of Price Comparisons

2.4.1 Proposal Seven

(a) Summary of Proposal

Currently, the eighth requirement under the principle of the Calculation of Price Comparisons section states:

“8. The website provider should emphasise to consumers the importance of entering accurate information in order to get the best comparison and should encourage consumers to input their annual consumption figures in order to do this.

- *Where a consumer is unable to provide their annual consumption figure the website provider must use an average annual figure of 5,300kWhs for electricity and 13,800kWhs for gas.*

These figures have been updated following a review conducted in the CRU. By having specific figures in the requirement restricts the ability for price comparison websites to progress alongside updates conducted by the CRU. Thus, the following amendment to the requirement was proposed.

Proposal 7:

8. *The website provider should emphasise to consumers the importance of entering accurate information in order to get the best comparison and should encourage consumers to input their annual consumption figures in order to do this.*

- *Where a consumer is unable to provide their annual consumption figure the website provider must use an average annual figure for **typical consumption as set out by the CRU for electricity and gas.***

(b) Summary of Responses

All responses were in favour of amending the requirement to include this phrase. Bord Gáis suggested an alternative phrasing to keep industry terminology consistent, this being “*the website provider must use an updated average annual consumption figure approved by the CRU for electricity and gas,*” instead of the proposed “*typical consumption as set out by the CRU*” as the former is the terminology required of suppliers on their websites.

Switcher.ie stated that this functionality is already on their website, but they also had a suggestion in relation to presenting a filter option for number of bedrooms and household size, referencing another request for feedback discussed in the Consultation Paper. They suggested comparing Ofgem’s national average use factors to the Irish market to see if the information would be comparable enough to make a decision concerning average use per household size.

Bonkers.ie also stated that they already encourage customers to use the estimated average annual consumption figures where customers do not know their current energy usages.

(c) CRU Response

The CRU is aware that consistency should be in place throughout the industry and acknowledges the suggestion by Bord Gáis to use the same terminology that is provided in the Supplier Handbook.

Similarly, the CRU acknowledges the suggestion provided by Switcher.ie to compare industry averages for the Irish market with the UK market. This presents several obstacles as more than just the national averages would have to be taken into consideration. There are differences in the way the UK conducts energy ratings for the buildings as compared to the Irish BER rating system, which may influence the data for varying sized household. There is also the potential of different climates and different consumption habits due to varying population size. This is a good initial consideration for determining a data set for household size, however more research would have to be conducted prior to the introduction of a requirement or optional filter.

The CRU invites participants to conduct this research and present it along with methodologies for calculating consumption by household size in future consultations.

(d) CRU Decision

It is the decision of the CRU to include this proposal into the accreditation framework, with the adjusted terminology for consistency throughout the market.

Decision 7:

8. The website provider should emphasise to consumers the importance of entering accurate information in order to get the best comparison and should encourage consumers to input their annual consumption figures in order to do this.

- *Where a consumer is unable to provide their annual consumption figure the website provider must use **an updated average annual consumption figure approved by the CRU for electricity and gas.***

2.4.2 Proposal Eight

(a) Summary of Request

The CRU posed a request for responses concerning cash back offers or other offers tied to products and the calculations for their application under certain filters of comparisons. A cash back offer usually involves a supplier offering a certain monetary amount off the customer's bill on sign up, which is either applied automatically to the customer's bill or once the customer signs up to avail of the offer on their account.

This was in response to price comparison websites contact to the CRU concerning principles one and two of the Calculation of Price Comparison section of the accreditation framework, which state:

- 1. When making a price comparison calculation the website provider must not include the following factors;*
 - *Introductory sign up offers, one-time discounts/special offers or other promotional discounts that last for less than the duration of the tariff,*
 - *Discounts that apply to other services that a supplier may add to a product offering,*
 - *Non-price offers,*
 - *For a comparison period of 12 months: any one-off payment after the first 12 months of a consumers supply start date or after any subsequent 12-month period.*
- 2. When making a price comparison calculation the website provider should include the following factors in their calculations;*

- *Recurring discounts that are paid automatically: for paying by a certain method (e.g. monthly Direct Debit); dual fuel discounts; online discount; compulsory paperless billing discounts*
- *Fixed charges (e.g. a fixed monthly membership fee)*

Any potential review to these principles would entail cash back offers that are applied automatically on customer sign up (i.e. where the customer does not have to take any extra steps to avail of the cashback offer) being included in the calculation of an EAB on price comparison websites. The rationale for revising the principles to accommodate this would be to take into account all energy costs such as the unit rate, standing charge and any taxes or levies along with the monetary value attributed to certain cash-back offers. One potential option would be to allow for an opt-in filter on price comparison websites which would rank Estimate Annual Bills including cash-back offers which are automatically applied to customer's bills on sign up.

Since the publication of the accreditation framework in 2011, tariff offers have also developed significantly with a number of associated products on offer for customers on sign-up, for example energy management devices, services, and vouchers. The CRU is of the view that these should be presented separately on the main comparison page for customers. Thus, the specific request for feedback is presented below.

Proposal 8:

The CRU invited feedback from stakeholders concerning the requirement to present cash-back offers separately to the Estimated Annual Bill and any opt-in filters that may be applied to price comparison websites to compare cash-back and other offers.

Feedback was also invited from stakeholders on the comparison of energy management devices, services and the facilitation of comparison of broader market innovations.

(b) Summary of Responses

Concerning the area of cashback offers, three of the respondents felt they could be included in the calculations where the cashback offer is part of the signup deal and it is automatically deducted from the customer's bill, meaning the customer must take no action to receive the offer.

Just Energy also agrees with the proposition of including cashback offers into search results. They again emphasised the importance of displaying these costs on a comparison timeline of more than 12 months, reiterating earlier points where they mentioned that the majority of customers do not switch after one year.

Both Switcher.ie and Bord Gáis Energy had reservations concerning the cashback offers. Switcher.ie was in agreement for presenting cashback offers, but only where they would be displayed with an optional filter in which the default kept the cashback offers separate to the EAB, and the only cashback offers included were the ones that would be automatically deducted from the bill. They also stated that it would have to be clear to the customer that the cashback will have a different impact on bills depending on the energy consumption by the customer, and that the way to most accurately calculate results would be to use actual consumption values.

Bord Gáis also considered the filter option for PCWs, however, they felt that this information could become confusing to customers who are presented already with a high number of comparison options. Bord Gáis also stressed that including any type of cashback information could be confusing to the customer because it would lead to different tariff prices being displayed on the supplier's websites and on the PCW.

Regarding the topic of Energy Management Devices (EMD) Just Energy agreed with listing these innovative products on the PCW believing this would enhance competition, but they also stressed that they should be listed separately to the normal results as they would not be equitably comparable as normal offers compared through EABs.

Two other respondents were also in favour of listing these non-cashback offers separately from the EAB, with requirements to show their retail value, their energy reduction benefits and any costs of installation if applicable.

Bonkers.ie believed that the value of the devices should not be factored into any of the calculations but did agree that as much information as possible pertaining to these devices be available to the customer.

Bord Gáis Energy welcomed the idea of allowing customers to compare these devices but were concerned as the products were not homogenous. To remedy this, they suggested at a minimum, the customer be provided a link by the PCW that would inform them of the technical provisions and functionalities of the services.

Switcher.ie suggested using a pill/flag within the results to show the information behind the EMD where others suggested adding a separate search result entirely just to compare these devices.

(c) CRU Response

The CRU was pleased to see the level of engagement from the respondents concerning these topics. As mentioned in the Consultation Paper, the CRU proposed that cashback offers be included as an additional filter option, and only cashback offers that would be included automatically on the customer's account be included in the calculations. The default comparisons

would still be the same as they currently are, keeping consistency with what is required of suppliers in section 2.3.1 of the Supplier Handbook when they are presenting their tariffs. This would minimise confusion to customers as they would still be seeing the same information on the supplier's websites as the PCWs but would have the additional option to include cashback offers into their results if they wished.

In terms of the period presented for the results, the default would still be a standard 12-month comparison, but as stated in Decision 3, customers will have the ability to compare these offers on a longer basis if they choose to do so. The reasoning is the same as mentioned in section 2.3.1, that the best default comparison is one that matches the typical length of a contract offered to customers.

To address the suggestion that it would have to be explicit to customers that energy consumption levels will have an impact on the bill, where cashback offers are included; this also applied to any normal offer presented on a PCW. This notice should be included in the filter option for customers to add their own consumption levels and a notice of accuracy should be stated at that filter if the PCW wishes to do so.

The CRU was also pleased that respondents felt that EMDs should be included for alternative comparisons. The interest from customers is high on these types of devices and presenting this information on PCWs will increase the level of customer engagement and can be a push for further innovation by suppliers on these types of technology. The CRU will take these responses for further consideration and a proposal may be present in a future consultation regarding these devices, however for the current revision, the CRU has decided not to make any changes to the framework regarding EMDs.

(d) **CRU Decision**

As mentioned, no change to the framework will be made in relation to the inclusion of Energy Management Devices in the comparison results, however, it has been decided to include a new requirement concerning cashback offers into the PCW Accreditation Framework. Please note that this requirement will be added into the ***Website Filter Options and Results*** section of the framework.

Decision 8:

A website provider may provide a filter option in the search page for results to include cashback offers only where the offer is automatically applied to the account and no additional steps have to be taken by the customer to avail of the cashback offer other than signup.

It is also decided requirement one of the section of Calculation of price comparisons be restructured in order to comply with this new requirement. It will be split into two separate requirements which are stated below:

Decision 8.1

1. *When making a price comparison calculation the website provider must not include the following factors;*

- *discounts that apply to other services that a supplier may add to a product offering,*
- *non-price offers,*
- *for a comparison period of 12 months: any one-off payment after the first 12 months of a consumer's supply start date or after any subsequent 12 month period.*

Decision 8.2

When making a price comparison calculation, the default results must not include introductory sign up offers, one-time discounts/special offers or other promotional discounts that last for less than the duration of the tariff.

2.5 Accuracy and Updating Tariffs

2.5.1 Proposal Nine

(a) Summary of Proposal

An additional requirement was proposed concerning the updates of tariffs once a price change has been announced. As discussed, there are several potential methodologies for presenting this information, however the current accreditation framework is not specific in this area and this has led to different approaches being taken by different price comparison websites. To attempt to reduce the confusion surrounding price changes and tariff calculations the following proposal was suggested.

Proposal 9:

Where a price change has been announced by a supplier, with the effective date of the price change and associated tariffs known, where possible the estimated annual bills of affected tariffs should be presented to take account of this price change. The estimated annual bill for the next 12 months should be calculated based on both the current and impending tariff.

(b) Summary of Responses

This proposal was met with the same hesitancy that surrounded proposal number four as both proposals suggested making changes to the framework in terms of price changes. Again, Just Energy was the only respondent in complete agreement with the proposal.

Electric Ireland expressed concern with the presentation of the EABs. They were concerned that the presentation of two EAB's (one based on current prices and one with the price change calculations taken into consideration) would be confusing to customers. They again reiterated their support for including pro-rata calculations for the EAB where a price change has been announced. They propose that only one EAB be presented where the price change calculation is in effect.

Bord Gáis Energy does not support the addition of this requirement into the framework. They referenced their response to proposal number 4 where it was suggested to calculate EABs on a pro-rata basis where price changes have been announced. For reference, they expressed concern over the implementation of these calculations for both suppliers and PCWs. They felt it would be confusing for customers if they were presented with different offers on a supplier website and on a PCW.

Switcher.ie also referenced their response to proposal 4 and used it as a response to this proposal. Again, they believed that implementing a pro-rata calculation would be confusing to consumers for the same reason Bord Gáis suggested. They also stated that information concerning price changes would have to be readily available to PCWs and the CRU for the effectiveness of applying the price changes to the PCW.

Bonkers.ie also referenced their response to proposal number 4, however, they were in support of adding this requirement to the framework. They worried that if prices were not calculated with this methodology then customers would be getting inaccurate information which could lead them to making uninformed decisions concerning their tariffs.

(c) CRU Response

The CRU again understands the complications surrounding presentable and accurate pricing information where a price change has come into effect. However, as mentioned previously, it is the responsibility of the CRU to ensure that customers are not faced with misleading and inaccurate information.

The CRU's response to the market's comments on this proposal are similar to those outlined in section 2.3.2. If the information regarding the tariff is flagged correctly by the PCW, which it should be as it would be a requirement made in Decision 4, then consumers would be aware that this offer

takes an upcoming price change into effect and the presentation of the offer will be different than what it presented on the supplier's websites.

Also, suppliers are required to give 30 days' notice of upcoming price changes as per Section 4.4. in the Supplier Handbook, which would be enough time for PCWs to add this information and conduct accurate calculations prior to the price change coming into effect.

Again, concerning the presentation of the two EAB's, the offer would be marked that a price change has been announced. The EABs will *clearly* be marked by the PCW that one EAB is based on current prices and one EAB is based on the price changes that have been announced. This information can be present in the information once the customer clicks on the offer, however the default price should be the EAB where the price change is taken into consideration in the calculations and should have a warning flag to announce the price change has been announced on that offer.

(d) CRU Decision

The CRU has decided to include this requirement into the revised framework. Understanding the hesitancy, but also reiterating the importance of providing accurate information to customers.

Decision 9:

Where a price change has been announced by a supplier, with the effective date of the price change and associated tariffs known, where possible the estimated annual bills of affected tariffs should be presented to take account of this price change. The estimated annual bill for the next 12 months should be calculated based on the both the current and impending tariff.

2.5.2 Proposal Ten

(a) Summary of Proposal

This proposal was set to increase the transparency of information provided to customers in terms of calculations for the estimated average price for each tariff.

Proposal 10:

A message or link should be provided on the results page explaining how an estimated average price for each tariff is calculated.

(b) Summary of Responses

All respondents were in agreement of this proposed requirement, though Bord Gáis Energy and Electric Ireland showed a preference towards using a link over a message.

Bord Gáis further suggested that the information presented be in line with similar requirements for suppliers outlined in section 2.3.1 of the Supplier Handbook. Electric Ireland conveyed the need for simplicity and stated that this information should be straightforward, and all assumptions should be made clear to customers.

Both Bonkers.ie and Switcher.ie stated that this information is already available for customers using their websites.

(c) CRU Response

The CRU is aware of the balance between presenting transparent calculations and information to customers and the usability of the websites, so these requirements are not prescriptive on where this information is presented, as a result it will be up to the decision of the PCW as to how they provide this information on their website, so long as the information is not misleading or inaccurate in anyway.

(d) CRU Decision

It is the decision of the CRU that this proposed requirement be added into the Accreditation Framework for Price Comparison Websites as written.

Decision 10:

A message or link should be provided on the results page explaining how an estimated average price for each tariff is calculated.

2.5.3 Proposal Eleven

(a) Summary of Proposal

The proposal below was set to increase the transparency of information provided to customers in terms of calculations for the estimated average price for each tariff.

Proposal 11:

Where a website provider displays an estimate of the savings a consumer could make by switching to a new tariff, the website provider must include a link or message explaining how this savings figure is calculated.

(b) **Summary of Responses**

There were no objections to this proposed requirement however, Just Energy did provide a warning stating savings alone should not be the only consideration for customers. By limiting information to just savings, suppliers may become less innovative when thinking of new products to sell customers, instead solely focusing on ways to reduce costs and prices.

Switcher.ie and Bonkers.ie mentioned that they already provide these details on their websites.

(c) **CRU Response**

The CRU recognises there are more ways to compare tariffs instead of just focusing on savings, however, it is apparent that consumers weigh savings as one of the most important factors when making purchasing decisions. Therefore, PCWs must ensure that complete information is presented to consumers on how their savings are calculated as most customers are looking to pick tariffs based on lowest cost. It is not the view of the CRU that this would reduce the innovative nature of the market, instead it would encourage new ways for suppliers to reduce costs and stay competitive, which would in turn benefit consumers.

(d) **CRU Decision**

It is the decision of the CRU to add this requirement into the accreditation framework as it is currently written.

Decision 11:

Where a website provider displays an estimate of the savings a consumer could make by switching to a new tariff, the website provider must include a link or message explaining how this savings figure is calculated.

2.6 Website Filter Options and Results

2.6.1 Proposal Twelve

(a) **Summary of Proposal**

The second of the current requirements set out under Website Filter Options and Results states:

“2. Accredited website providers must include VAT in all rates as shown and the final price comparison results and clearly indicate that this is the case.”

It is proposed to amend this requirement to ensure that all relevant price details are included on price comparison websites. Therefore, the proposed requirement is:

Proposal 12:

2. Accredited website providers must show all prices *inclusive and exclusive of VAT and the final price comparison results and clearly indicate that this is the case. The PSO levy and carbon tax, where applicable, should also be separately identified in calculations. This further detail may be provided on a further information page for each offer.*

(b) Summary of Responses

Bord Gáis Energy and Electric Ireland were in favour of amending this requirement. It was believed that this would be a better way to inform customers of the composition of their energy costs. Electric Ireland went further to suggest having this information on a separate page to avoid customer confusion when comparing tariffs.

Bonkers.ie and Switcher.ie were also both in favour of adding this requirement stating that information on tariffs is already presented both inclusive and exclusive of VAT.

Just Energy did not see the added benefit of requiring prices to be displayed both inclusive and exclusive of VAT believing it would be too confusing for customers when presented with all of this information.

(c) CRU Response

The CRU believes amending the requirement in the proposed way will be a benefit to the consumer in terms of both transparency of information and better knowledge of the composition of tariffs. Requiring tariffs to be displayed with this information is also useful for consumers because it will increase consistency in the market. Suppliers are also required to display all of this information on their websites, as per requirement 2.3.1 of the Supplier Handbook.

(d) CRU Decision

It is the decision of the CRU to amend the existing requirement as proposed and add it to the accreditation framework for price comparison websites.

Decision 12:

2. Accredited website providers must show all prices *inclusive and exclusive of VAT and the final price comparison results and clearly indicate that this is the case. The PSO levy and carbon tax, where applicable, should also be separately identified in calculations. This further detail may be provided on a further information page for each offer.*

2.7 Green Tariffs

2.7.1 Proposal Thirteen

(a) Summary of Proposal

In recent years, an increasing number of tariffs labelled as 'green' have become available, guaranteeing that customer's electricity is sourced from renewable generation. A new proposal was suggested to add to the section on green tariffs which would provide further information to customers when purchasing these green tariff options.

It is proposed that the website provider displays the supplier's fuel mix alongside the tariffs. Fuel mix disclosure presents reliable information regarding the sources of energy that suppliers have chosen to meet their customers' demand (their fuel mix) and the related environmental impact. Based on this, customers considering switching supplier may take a supplier's fuel mix into account and it would seem useful to include this information with offers displayed on price comparison websites. The proposed requirement is as follows;

Proposal 13:

Website providers should include a supplier's fuel mix information with the detailed information displayed about each tariff.

(b) Summary of Responses

Electric Ireland, Just Energy and Switcher.ie were in agreement with the proposal, with Switcher.ie stating that this messaging is already present on their website.

Bord Gáis Energy agreed with the importance of having the fuel mix information available to customers, however felt that due to the high number of comparators, this information should be added through a footnote link which could direct customers to another page to compare fuel mix across all suppliers on the PCW's website.

Bonkers.ie stated that they already offer fuel mix disclosure on their website, however they warned against misleading information to customers. They referenced the CRU's recent publication on Fuel Mix Disclosure for 2017 ([CRU18203](#)) and relayed information from the report that some of the suppliers did not submit disclosures for the year and were thus given residual fuel mix allocations. Consequently, Bonkers.ie is concerned that this information is misleading to customers concerning the true make up of a supplier's fuel mix. Bonkers.ie then mentioned that the purchase of Guarantees of Origin or (GO) also understate the amount of renewable energy produced in

Ireland. They also clarified that as all electricity comes from the same grid, it is uncertain to an individual customer whether the electricity they are receiving is truly 100% renewable.

(c) CRU Response

To address Bord Gáis' concern, the residual fuel mix information will only be seen with the detailed information about the tariff. The customer will have to click on the offer to access this information, and thus will be presented with this information only pertaining to one tariff at a time. Requiring a separate page to compare all supplier's fuel mixes may be more confusing to customers as they would not be able to directly see the fuel mix in relation to the specific offer they were looking at. The suggested way will allow for easy access of this information to the consumer when they are browsing tariffs.

The Fuel mix calculations are conducted by the Single Electricity Market Operator (SEMO) in accordance with approved methodology. If a supplier fails to make a submission of their fuel mix to SEMO, they are provided with a residual fuel mix, which is left over from the All-Island fuel mix after individual supplier's fuel mixes have been calculated. In this sense, it is still accurate data presented for the supplier as the residual fuel mix incorporates data from the All-Island Mix. These suppliers would have to have fuel mixes comparable to the residual mix to arrive at the All-Island Figure.

The GOs were designed in European Legislation which certifies that electricity is generated from renewable energy sources. Electricity suppliers can buy these GOs to certify that their electricity demand is covered by certified renewable sources. Although this leads to a higher percentage stated for renewables in Ireland's Fuel Mix, it does not mislead customers as they are still buying electricity that is backed by renewable sources, even if it is imported renewable electricity.

It is necessary that this information be provided to customers who wish to know more about fuel mixes. By presenting fuel mix as stated, it is not misleading to customers as the suppliers are making sure that their electricity is backed by renewable sources, however the CRU considers that it might be more beneficial to consumers to have access this information easily.

(d) CRU Decision

The CRU decides the proposed amendment should be included in revised framework for accreditation. For better customer transparency to information, however, it has been decided that a link should be provided alongside the fuel mix disclosure to the most recent version of the CRU's Fuel Mix Disclosure publication to ensure customers can accurately understand how and what the calculations for the fuel mix are comprised of. Therefore, the revised version of the amendment will be:

Decision 13:

*Website providers should include a supplier's fuel mix information with the detailed information displayed about each tariff. **A link should also be provided alongside this information for access to the most recent fuel mix disclosure published by the CRU.***

2.8 Website Management

2.8.1 Proposal Fourteen

(a) Summary of Proposal

Currently, requirement four under the Website Management principle of the Accreditation Framework states

"4. The use of accredited price comparison platforms on third party websites must be pre-approved by the CRU. In addition the use of the CRU accreditation logo may only be used on third party website where accompanied by the accredited websites logo and where it is clear to whom the accreditation applies."

It was proposed to revise this requirement to ensure that the logo should not be used more broadly than in relation to accredited price comparison websites for electricity and gas. The changes to the requirement are highlighted below:

Proposal 14:

*4. The use of accredited price comparison platforms on third party websites must be preapproved by the CRU. In addition the use of CRU accreditation logo may only be used on third party websites where accompanied by the accredited websites logo and where it is clear to whom the accreditation applies. **It is not permitted to use this logo to represent any broader accreditation than the price comparison website itself. It should be set out clearly on price comparison websites that the CRU logo and accreditation is related only to the comparison of prices for electricity and gas and not to any other comparison services a website may provide.***

(b) Summary of Responses

Electric Ireland, Switcher.ie and Bord Gáis Energy Were in support of this proposal. Electric Ireland did address the fact that the CRU was requesting feedback on home energy devices and 'service ratings,' but they overall agree on the restrictions to maintain the integrity of the logo.

Bonkers.ie was highly adamant that the use of the accredited price comparison platforms should be prohibited entirely on third-party websites unless these websites are also audited. They agreed with the addition of the amended proposal, however, they stressed that the use of the CRU logo is

a signal to customers that they can place a high-level value of the website. It is believed that using the logo on an unaccredited third-party site will misconstrue the value of that site to a higher quality.

(c) CRU Response

The CRU acknowledges the requests for information on home energy devices and ‘service ratings,’ however if these are incorporated into future decisions, these devices will be operating in the electricity and gas markets, thus it will apply under the remit of the CRU and the logo may still be used.

The CRU also notes the importance of keeping the integrity of the accreditation and the CRU logo and emphasises the line that these third-party websites must be approved by the CRU prior to the accredited platform to be used on these sites. The amendment to the requirement will further assist in keeping this integrity upheld as it limits the use of the CRU logo to just the electricity and gas markets.

(d) CRU Decision

The CRU decides to introduce the proposed amendment as written into the accreditation framework for price comparison websites.

Decision 14:

4. The use of accredited price comparison platforms on third party websites must be preapproved by the CRU. In addition the use of CRU accreditation logo may only be used on third party websites where accompanied by the accredited websites logo and where it is clear to whom the accreditation applies. It is not permitted to use this logo to represent any broader accreditation than the price comparison website itself. It should be set out clearly on price comparison websites that the CRU logo and accreditation is related only to the comparison of prices for electricity and gas and not to any other comparison services a website may provide.

2.9 Consumer Information and Accessibility

2.9.1 Proposal Fifteen

(a) Summary of Proposal

It was proposed that a new requirement be added to the section on Consumer Information and Accessibility, reflecting a requirement which was recently introduced in Ofgem’s Confidence Code. This new requirement is intended to provide more material to customers who wish to avail of better information regarding energy efficiency. The proposed requirement is set out below:

Proposal 15:

A website provider should provide signposting on their website to independent sources of advice on energy efficiency matters that will be of the benefit to all energy consumers.

(b) Summary of Responses

All of the respondents we in agreement to adding this requirement to the revised framework. Electric Ireland noted the importance of keeping these information sources non-affiliated with the price comparison websites themselves.

Bord Gáis Energy and Bonkers.ie stressed the idea that these sources of information should be reputable in some way, even identifying the SEAI as a potential source of information. It was also considered that the CRU should create a list of reputable sources of information that the price comparison websites can reference on their websites.

Switcher.ie suggested adding advice on energy efficiency matters to energy guides, blog posts and opt-in emails if it would be a benefit to the customer.

(c) CRU Response

The use of the word 'independent' in the requirement implies that any source referenced on the price comparison website will be a non-affiliated source, thus upkeeping the impartiality and independence of the price comparison websites.

The CRU also agrees with the respondents concerning signposting credible and reputable sources such as the SEAI. This information can be presented to customer in any form of sign posting, but if the PCW chooses to provide this information through blogs or opt-in emails, it is necessary to make sure these comply with GDPR and are not sent to customers who do not subscribe to this information.

(d) CRU Decision

As there were no objections to requirement, it is decided that the proposed requirement shall be added into the revised accreditation framework however it will be revised to include the mentioning of the SEAI as a reputable source for energy efficiency advice.

Decision 15:

*A website provider should provide signposting on their website to independent sources, **such as the SEAI**, of advice on energy efficiency matters that will be of the benefit to all energy consumers.*

2.10 Customer Service Ratings

2.10.1 Proposal Sixteen

(a) Summary of Proposal

In some jurisdictions price comparison websites may apply ratings to energy suppliers based on their customer service. It is important that any methodology used to measure customer service levels is reasonable and fair. There are currently two requirements under the customer service ratings section of the accreditation framework, and this below proposal would become the third requirement of the section.

Proposal 16:

In developing a supplier ratings methodology, it should be evidence-based and objective, applied consistently across suppliers, comprehensively cover all suppliers and be refreshed at least once every 12 months. Explanatory messaging around these ratings should be clear and objective.

(b) Summary of Responses

There was some hesitancy from suppliers surrounding the incorporation of this requirement.

Just Energy posed several questions. The first being concerning with the level of engagement that the suppliers have with the PCW as compared to other suppliers. They also queried as to the role of the PCW in providing supplier ratings and suggested it might be better if the CRU was to provide those ratings. They expressed that conflict could arise between schemes and organisations that suppliers engage commercially to measure their customer service ratings. Finally they mentioned that with multiple PCW's having different ratings, this would confuse the customer rather than provide clarity.

Electric Ireland was not in support of this proposal. They pointed out the challenges behind developing a consistent approach for comparing metrics across suppliers. They expressed concern over trying to compare a supplier who offers a wide variety of products across both the electricity and gas market to a supplier who may only supply one product in one market. They requested that the requirement be delayed until the introduction of smart metering.

The remaining responses were in favour of adopting the requirement into the framework, but also reiterated the importance that the methodology should be evidence-based and objective. They welcomed a methodology to be developed by the CRU in which they could follow to easily ensure consistency.

(c) CRU Response

The CRU would like to first note that the current framework already allows for the development of a ratings system within certain restrictions. This proposal is an amendment to the already existing requirements. This proposed requirement was enhancing the consistency of the methodology to ensure it would not become biased by the PCWs.

The CRU would like to clarify some of the concerns arising from the responses. Firstly, suppliers with different levels of engagement with the PCWs would not be treated differently. This would result in clear violation of the independence and impartiality clause of the accreditation framework. Secondly, customer service is a metric that is highly important to consumers. There are many different platforms for reviews from customers which have options to rank the customer service levels of suppliers across various sources on the internet. By allowing PCWs to develop a customer service rating methodology, it would create a credible customer service rating site compared to the alternative of a customer looking up other customer reviews for service. Thirdly, as just mentioned, there are numerous ways for customers to compare customer service of suppliers on the internet. This requirement would reduce confusion of customers because they would be getting ratings from a trusted source provided with a methodology that has to be approved by the CRU through the second requirement of this section of the framework. For example the CRU publishes numerous reports on supplier activities which could be useful in providing both quantitative and qualitative information to inform a non-price based comparison of suppliers. These include retail market monitoring reports, consumer surveys and the annual customer care report.

To reference the next supplier's concerns, there may be some slight challenges presented by comparing different size suppliers, however this rating system is for customer service, which theoretically should be comparable ignoring the size of the company. If it is a large company with many products and services being offered, it is just as important to make sure representatives dealing with customers act ask knowledgably and friendly as those representatives employed by smaller suppliers offering fewer products.

For suppliers worrying a negative review would have a greater impact on a smaller supplier than a larger one, this should be considered in the methodology of rating system to ensure fairness across the entire rating system, as previously mentioned, the methodology would have to be approved by the CRU. It would not be fair to approve a methodology that would put smaller suppliers in higher jeopardy than larger suppliers.

(d) CRU Decision

At this time the CRU will incorporate this requirement into the accreditation framework as it helps enforce the principles which are already in place. However, the CRU will take into consideration

the requests for developing the methodology of the rating system and may inform PCWs of this at a later date. For now, the methodologies still must be approved by the CRU as stated in the second existing requirement of the customer service section, and they now must be updated to reflect the new requirement.

Decision 16:

In developing a supplier ratings methodology, it should be evidence-based and objective, applied consistently across suppliers, comprehensively cover all suppliers and be refreshed at least once every 12 months. Explanatory messaging around these ratings should be clear and objective.

2.11 Customer Care

Price Comparison websites should be consumer focused and have established customer care procedures. Accessing an accredited website may be a consumer's first source of information regarding tariffs and suppliers; therefore, it is essential that the websites should inform consumers of their rights. In order to ensure that website providers do this they must adhere to the following set of requirements:

Current requirements under the Principle for Customer Care:

1. The website provider must provide a link to www.energycustomers.ie, the CRU's website for electricity and natural gas consumers, and this must be displayed in an appropriate position on the website as well as a short explanatory text to be set out by the CRU.
2. The website provider should establish effective customer care and complaints handling procedures.

The CRU had not proposed any revisions to the text or additional requirements for Customer Care, however the link to www.energycustomers.ie will be replaced with a link to the CRU's website, www.cru.ie, which includes a section for energy customers

2.12 Data Protection

2.12.1 Proposal Seventeen

(a) Summary of Proposal

The current requirement in the accreditation framework reads:

“1. Notwithstanding the provisions of this framework, service providers are bound by all relevant legislation, including Data Protection legislation with regards to the use of customer information.”

It was proposed to amend this current requirement to comply with the recent General Data Protection Regulation (GDPR) 2016/679 that came into effect. The proposed requirement now reads:

Proposal 17:

1. Notwithstanding the provisions of this framework, service providers are bound by all relevant legislation, including Data Protection legislation and the [General Data Protection Regulation](#) with regards to the use of customer information.

(b) Summary of Responses

All but one of the respondents were in agreement with the addition of GDPR to the accreditation framework. Bord Gáis Energy saw the addition as slightly redundant since GDPR is included in the blanket term of ‘all relevant legislation.’ Due to this, they also saw it as a potentially inconvenient addition as they believed that this requirement would then have to be amended each time new relevant legislation comes into effect.

(c) CRU Response

The CRU does note that it would be tedious to amend the requirement each time a new data protection legislation comes into effect, however the addition of GDPR into the requirement is used to reflect the significance of the legislation. GDPR had a major impact restructuring how data protection works, and it is necessary to highlight the requirement to PCWs to comply with, considering the impact the legislation had on online services. It is not the case that the requirement will have to be amended each time relevant legislation comes into effect, as noted the term ‘all relevant legislation’ will ensure compliance, it was just the consideration of the CRU to highlight the importance of the new GDPR guidelines for online services.

(d) CRU Decision

It is the decision of the CRU to introduce the amendment as proposed into the revised accreditation framework for price comparison websites.

Decision 17:

1. Notwithstanding the provisions of this framework, service providers are bound by all relevant legislation, including Data Protection legislation and the [General Data Protection Regulation](#) with regards to the use of customer information

2.13 Future Principles

In this review the CRU is cognizant of the fact that updates to the accreditation framework will be required in future due to significant changes to the retail energy markets brought about by smart meters, smart grids and demand response. These developments will have an impact on how well-functioning price comparison websites should operate, and will require associated updates to the framework, for example for price comparison websites to include offers for prosumers and demand side response. Smart meters will facilitate offerings of new products and services, such as time-of-use tariffs, to all energy customers. These updated meters will provide customers with more granular information about their consumption and make new products and services available.

Time-use-tariffs will be based on electricity prices and demand at different times of the day, meaning customers will be able to shift some of their electricity usage to cheaper time periods. Any transition to time-of use tariffs will need to be accompanied by a further review of the accreditation framework and audit process to ensure accessible comparisons of new tariff types are available for customers.

3. Audit Process

The CRU did not propose any changes to the main annual auditing procedure that is currently in place to ensure that accredited websites continue to meet the principles of accreditation and maintain high standards and is of the view that the process as set out in CER/11/144 for Audits under section 3 and Revocation of Accreditation under section 4 should remain in place.

However, two minor amendments to the auditing process were proposed;

1. The CRU is proposing that price comparison websites cannot appoint the same independent auditor for the annual audit for more than three years in a row.
2. The CRU also proposes that the timing and frequency of regular audits, to be carried out by the CRU, are reduced to once a year, to take place following the annual audit.

In order to ensure that accredited websites continue to adhere to the principles of the accreditation framework the CRU will audit price comparison websites on a regular basis, through annual reports, regular audits and ad hoc audits as necessary. For annual audits, accredited websites are required to employ an independent auditor to conduct an audit of their compliance with the accreditation framework. Similarly, it is envisaged that there will be no changes to the application process and associated cost. Feedback was also requested on the timing of the audit for 2018.

Proposal 18:

The CRU has proposed two minor amendments to the audit process;

- 1. The CRU is proposing that price comparison websites cannot appoint the same independent auditor for the annual audit for more than three years in a row.*
- 2. The CRU also proposes that the timing and frequency of regular audits, carried out by the CRU, are reduced to once a year, to take place following the annual audit.*

(a) Summary of Responses

The two minor changes to the audit process were agreed upon by many of the respondents. However, Electric Ireland, Bord Gáis Energy and Bonkers.ie did suggest continually checking in with ad hoc audits on different compliance issues that may arise.

There were also conflicting views on whether to conduct the 2018 audit on the current or the revised framework. Those in favour of conducting the audit under the current framework made the

argument that there should be sufficient time in place to adopt the revised and new requirements into their methodologies.

Bonkers.ie was the only advocate against the revised changes to the audit process. They claimed it was already difficult to find an independent auditor without the provision of needing a new auditor every three years. They also were one of the respondents that felt ad hoc audits were beneficial to the market and have found critical issues in the past.

(b) CRU Response

The CRU believes that given a three-year notice, PCWs should be able to secure independent auditors. There is the risk that an auditor develops a relationship with the PCW and could yield biased results, or alternatively, the auditor develops the same process year on year and becomes too familiar with the PCW potentially missing new issues that could arise.

The CRU will also take into consideration the strong advocacy for continuing to conduct ad hoc audits on the PCWs. It is worthwhile to hear that the audits have made an impact on the market and are regarded as useful to both suppliers and price comparison websites.

(c) CRU Decision

The CRU has decided to impose the first minor amendment to the audit process and require that PCWs change their auditor at least once every three years. As this time of publication will not be enough notice for the 2018 audit, and as it was pointed out that there is difficulty in finding an independent auditor for the code, this will come into effect for the audit to be conducted in 2020.

The CRU has also decided to keep conducting ad hoc audits along with the annual audit, however these audits will be on a smaller scale than previous ad hoc audits due to the frequency of the audits.

Finally, concerning the core of this year's audit, it has been decided that the CRU will not audit against the old framework for 2018. Instead the CRU will bring forward the date of the 2019 audit to take account of the revised framework. Given the implementation date is 31st March, the CRU will conduct the 2018 in Q2 2019. The CER will contact PCW providers to notify them of the details of the 2019 audit.

4. Summary of Decisions

A number of decisions regarding revisions to the accreditation framework for price comparison websites have been outlined in this document. The decisions are summarised below:

- Under the principle of independence and impartiality, whereby a website must not be owned or affiliated with any electricity or gas supplier, requirement 4 concerns the agreements PCWs may enter into with suppliers to receive commission for switched carried out through their website, the decision was to amend the requirement to require a table be added to the price comparison website for simplified viewing of this information by suppliers. A new requirement was also added to the framework, requiring the information of exclusive offers from suppliers be added alongside this information regarding commissions received.
- Under the principle of Inclusion and Presentation on tariffs, which requires PCWs to ensure that customers are provided with the most complete and accurate tariff information available, it has been decided to amend requirement 2 to update the time period for the comparisons of tariffs by PCWs. Requirement 3 has been amended to include price changes into the text, and to require where a price change has been announced that the PCW must calculate the EAB on a pro-rata basis with relation to the new tariffs. A new requirement has been added to the framework, requiring PCWs to post information on legacy tariffs for comparison of current tariffs. Another requirement was added concerning the presentation of tariffs for alternative payment methods, requiring they be listed separately.
- Under the principle of Calculation of Price Comparisons, which requires PCWs to provide clear, accurate and impartial results, a decision was set concerning the average annual consumption figures as set by the CRU. The set numbers were removed from the requirement and replaced with the standard terminology to reflect average annual consumption as determined by the CRU from time to time. Feedback was also received concerning the inclusion of cashback offers and Energy Management Devices when calculating the EAB. The CRU decided to amend the first requirement of the Calculation of Price Comparisons section to remove the condition on not allowing for the addition of introductory sign up offers, one time discounts/special offers or other promotional discounts that last for less than the duration of the tariff and create a new requirement stating that those offers be calculated in the *default* price comparison. Another

requirement was added under the Website Filer Options and Results section which allows for an opt-in filter to compare cashback offers.

- Under the principle of Accuracy and Frequency of Tariff Updates, whereby websites should have accurate and up to date tariff information, it was decided to add a requirement in which suppliers must calculate the EAB with consideration to price changes that have been announced. Two new requirements were added to the framework as well. The first providing information to customers concerning the calculation of the EAB and the second providing information to customers regarding how their potential savings for each offer are calculated.
- Under the principle of Website Filter Options and results, whereby results should be comprehensive, accurate and order in an appropriate manner, it was decided that a revision occur on the second requirement to include the information on the PSO Levy and Carbon Tax in price comparisons.
- Under the principle on Green Tariffs, which sets out requirements for displaying tariff offers that are labelled as 'green,' the CRU decided to include a new requirement for PCWs to present fuel mix information with detailed information displayed about each tariff, alongside a link to the most recent fuel mix disclosure statement published by the CRU.
- Under the principle of Consumer Information and Accessibility, under which accredited websites must be assessable and understandable for energy consumers, it was decided to add an additional requirement for PCWs to provide signposting on their website to independent sources of energy efficiency information. Reference was added to the SEAI as a reputable source for energy efficiency advice.
- Under the principle of Customer Service Ratings, on the principles PCWs must adhere to if they wish to assign ratings to suppliers based on customer service metrics, under the decision of the CRU an additional requirement was added on supplier ratings methodology and how it should be applied.
- No changes have been decided to the principle of Consumer care, except for updating the link to access consumer information on the CRU website.
- It was also decided to add the requirement to the audit process in which PCWs must change their auditor at least once every three years, but it was upheld that the CRU will

continue to conduct ad-hoc audits on the PCWs to ensure continual compliance. Furthermore, it was decided that the CRU will not audit against the old framework for 2018. Instead the CRU will bring forward the date of the 2019 audit to Q2 2019.

Principle		Decision
Independence and Impartiality	1	Revision to Requirement 4 to require a table with supplier names and logos to identify all suppliers that the website provider receives commissions from.
	2	A requirement requiring price comparison websites to state from whom they receive commissions for exclusive offers.
Inclusion and Presentation on Tariffs	3	Revision to Requirement 2 requiring website providers to provide an option to compare offers over a longer time period than one year.
	4	Revision to Requirement 3 to include guidelines on the presentation of Estimated Annual Bills where price changes are due to come into effect, requiring a pro-rata calculation.
	5	Addition of a requirement on provision of information on legacy tariffs.
	6	A new requirement to display information concerning alternative payment methods.
Calculation of Price Comparisons	7	Revision to Requirement 8 to update the average annual consumption figures as determined by the CRU.
	8	Addition of a requirement to allow for a filter for cashback offers that are automatically deducted from customer's accounts. A revision of Requirement 1 and addition of a requirement to comply with the new cashback requirement.
Accuracy and Frequency of Tariff Updates	9	Addition of a new requirement concerning presentation of Estimated Annual Bills where price changes are due to come into effect.
	10	A new requirement to inform customers how Estimated Annual Price is calculated.
	11	A new requirement to provide information on how estimates of customer's potential savings for each offer are calculated.
Website Filter Options and Results	12	Revision to requirement 2 to include information on the PSO Levy and Carbon tax in price comparisons.

Green Tariffs	13	A new requirement for website providers to display fuel mix disclosures and a link to the CRU Pass through cost information paper.
Website Management	14	Revision to requirement 4 in relation to the use of the CRU logo on third party platforms.
Consumer Information and Accessibility	15	Additional requirement on provision of signposting to energy efficiency information on websites, naming SEAI as a reputable source of advice.
Customer Service Ratings	16	Additional requirement proposed in relation to any supplier ratings methodology that website providers may use, setting out that it should be evidence based and objective.
Data Protection	17	Revision to requirement 1 naming the General Data Protection Legislation.

Finally, the accreditation framework was previously published as an annex to the Decision Paper (CER11/144). For clarity, the revised accreditation framework will be published as a standalone document.

5. Next Steps

This document has set out the CRU's decisions around revisions to the principles of accreditation for price comparison websites as well as both the audit process for accredited sites. All accredited providers are required to have these changes implemented no later than 31st March 2019. Therefore, it has been decided that the CRU will not audit against the old framework for 2018. Instead the CRU will bring forward the date of the 2019 audit to take account of the revised framework. Given the implementation date is 31st March, the CRU will conduct the audit in Q2 2019. Furthermore, the revised accreditation framework will be published on the CRU website as a standalone document.

The revisions and existing principles set out in the decision paper will be reviewed by the CRU on an ongoing basis to ensure that they remain up to date and take account of new market developments. Therefore, future consultations may arise again for the opportunity for feedback on these and potentially new principles to be placed in the accreditation framework for price comparison websites.

6. Annex Revised Audit Checklist

Accreditation Compliance Report			
1 – Independence and Impartiality	Frequency	Infringement	Compliant
a – Independent of any gas or electricity supplier of 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 – Table on the website that commission or payment is received by suppliers	Regular	Major	Yes/No
e – Table on the website that states from whom payments are received for exclusive offers	Regular	Major	Yes/No
f – Does not recommend an alternative supplier if a consumer cannot automatically switch online to chosen supplier	Regular	Major	Yes/No
g – No advertisements from energy suppliers displayed on the home page or on the energy price comparison pages	Regular	Major	Yes/No
2 – Inclusion and Presentation of Tariffs	Frequency	Infringement	Compliant
a – Includes all publicly available tariffs offered by licenced suppliers	Regular	Minor	Yes/No
b – Default period set as one year with the option to display longer time periods. The EAB should also be presented.	Regular	Minor	Yes/No
c – Rules around tariff offerings that expire/are due to change within the comparison period.	Regular	Minor	Yes/No
d – Gas and electricity base prices shown separately in dual fuel bundle	Regular	Minor	Yes/No
e – Details of non-cash offers listed separately to base prices	Regular	Minor	Yes/No
f – Legacy information is presented for comparison purposes	Regular	Minor	Yes/No
g – Details are listed for alternative payment methods for tariffs	Regular	Minor	Yes/No
3 – Calculation of Cost Comparison	Frequency	Infringement	Compliant
a – Cost comparison calculation does not include:			
a1 – Discounts that apply to other services	Regular	Minor	Yes/No
a2 – Non-price offers	Regular	Minor	Yes/No
a3 – Any discount paid beyond comparison period	Regular	Minor	Yes/No
b – Introductory sign up offers, one-time discounts/special offers or other promotional discounts are not included in default price comparisons	Regular	Minor	Yes/No
c – Cost comparisons should include the following:	Regular	Minor	Yes/No
c1 – Recurring discounts that are paid automatically	Regular	Minor	Yes/No
c2 – Fixed charges	Regular	Minor	Yes/No
d – CRU review on discounts			
e – The following details must be displayed where a consumer has entered details of their current tariff:	Regular	Minor	Yes/No
e1 – Current supplier's name	Regular	Minor	Yes/No
e2 – Current tariff name	Regular	Minor	Yes/No
e3 – Unit rates /standing charges	Regular	Minor	Yes/No
e4 – Current payment method	Regular	Minor	Yes/No
e5 – All discounts that are included in the calculation of the current tariff	Regular	Minor	Yes/No
e6 – Estimated current spend (€) per annum	Regular	Minor	Yes/No
e7 – Estimated current usage in kWh for gas and/or electricity per annum	Regular	Minor	Yes/No
f – Any termination fee customers will incur by switching from their current tariff shown	Regular	Minor	Yes/No
g – Clear indication of any tariff option that includes a fixed term contract or termination fee	Regular	Major	Yes/No
h – A split of 50% day/50% night when comparing nightsaver tariffs if the default	Regular	Minor	Yes/No
i – Filters have the ability for customers to enter their annual consumption	Regular	Minor	Yes/No
i1 – Where annual usages is not known, average annual consumption set by the CRU is used as default	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 tariff/suppliers added within two working days	Regular	Minor	Yes/No
c – Tariffs with lead time in excess of four weeks are not to be included	Regular	Minor	Yes/No
d – Where a price change has been announced, the EAB is calculated to reflect the price change	Regular	Minor	Yes/No
e – A message/link is provided for the calculation of estimated average price	Regular	Minor	Yes/No
f – Explanation of savings figure is provided where savings for a tariff are shown	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
a1 – Option is given to view all other tariffs beyond the initial page	Regular	Minor	Yes/No
b – Prices are shown inclusive and exclusive of VAT. PSO Levy/Carbon Tax are shown as applicable.	Regular	Minor	Yes/No
c – Results page clearly shows the requirements of each tariff option	Regular	Major	Yes/No
d – Filters offered to search results based on the different types of tariff as opt-in only	Regular	Minor	Yes/No
e – Filter option available to search results based on cashback offers which are automatically applied to accounts (optional)	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,			
f1 – A clear statement is seen positioned visibly at the top of the results page explaining what is shown	Regular	Minor	Yes/No
f2 – An option on the results page is there to expand the results and show all tariffs	Regular	Minor	Yes/No
f3 – This must not be the default position	Regular	Minor	Yes/No
g – Impact of selecting an opt-in filter is 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
d – Fuel mix information is presented on each tariff with a link to CRU fuel mix disclosure report	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 – This is the only price comparison website owned by this third-party.	Annual	Major	Yes/No
d – Approval given by the CRU where price comparison platform is used on third-party websites	Regular	Major	Yes/No
d1 – CRU accreditation logo on a third-party website is accompanied by the accredited website's logo	Regular	Minor	Yes/No
d2 – The CRU logo is only being affiliated with electricity/gas market on third-party site	Regular	Minor	Yes/No
8 – Consumer Information and Accessibility	Frequency	Infringement	Compliant
a – Explanation of different payment methods shown (Credit by cash/cheque, direct debt, prepayment, other)	Regular	Minor	Yes/No
b – Plain English is used	Regular	Minor	Yes/No
c – Website pages meet international best practice for accessibility (Universal Design)	Regular	Minor	Yes/No
c1 – Pages and attachments functionality meet guidelines from W2C World Wide Web Consortium	Regular	Minor	Yes/No
d – Website understandable and accessible to all energy customers	Regular	Minor	Yes/No
e – Links to relevant terms and conditions for each tariff are provided	Regular	Minor	Yes/No
f – Signposting is provided to independent sources on energy efficiency with reference to the SEAI	Regular	Minor	Yes/No

9 – Customer Service Ratings	Frequency	Infringement	Compliant
a – Approval from the CRU on the methodology used to assign customer service ratings	Regular	Major	Yes/No
b – Methodology is:			
b1 – Evidence-based and objective	Regular	Major	Yes/No
b2 – Consistently applied across all suppliers	Regular	Major	Yes/No
b3 – Refreshed within the past 12 months	Annual	Major	Yes/No
b4 – Contains explanatory messaging for the ratings	Regular	Major	Yes/No
10 – Customer Care	Frequency	Infringement	Compliant
a – A link to www.cru.ie is displayed in an appropriate position on the website	Regular	Minor	Yes/No
11 – Data Protection	Frequency	Infringement	Compliant
a – Compliant with Data Protection Legislation	Regular	Major	Yes/No