



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

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# Price Comparison Website Accreditation Framework

March 2019

**Reference:** CRU/19033

**Date**

26/03/2019

**Published:**

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# 1. Introduction

Price comparison websites will form part of the consumer's overall switching experience and therefore it is of paramount importance that consumers have a positive experience using price comparison websites and that a switch delivers the expected cost savings. The CRU considers that it is absolutely essential that consumers receive a fair and transparent service from accredited websites.

Accreditation entitles a price comparison website to use the CRU logo on its website and to advertise its accreditation. The CRU will insert links to accredited websites from the CRU website. Accreditation will provide credibility to the website provider and instil consumer confidence in the service. In order to ensure that this is well placed the price comparison website must comply with all of the principles set out in this section.

The following set of principles with which price comparison websites must comply with to become accredited.

## 2. Accreditation Principles

### 2.1 Independence and Impartiality

The primary obligation on any service accredited by the CRU must be that it is independent and impartial. This means that a price comparison website must not be owned or affiliated with any electricity or gas supplier. Therefore, in terms of the commercial arrangements that a website provider enters and the manner in which information is presented on the website the following set of principles must be met in order for a website provider to become accredited:

Principles for independence and impartiality:

1. The website provider must be independent of any gas or electricity supplier or of any company that is an affiliate of any gas or electricity supplier. The website provider must inform the CRU of any change in ownership or commercial interest which might impact on its independence and impartiality.

2. The information and data presented on the website must be impartial and not favour any particular electricity or gas supplier. Any information or price comparison results must not be presented in a manner which may directly or indirectly bias a consumer's decision.
3. Results must be presented in terms of lowest price, unless the consumer chooses to search by other criteria.
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.
5. 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.
6. Where a consumer cannot automatically switch online to their chosen supplier directly through the provider's website, the provider must not recommend an alternative supplier.
7. The advertisements from energy suppliers, their agents, affiliates, or brands operating under the licence of a supplier must not be displayed on the home/main page or on the energy price comparison pages of the service provider's website.

## **2.2 Inclusion and Presentation of Tariffs**

The main purpose of the price comparison website is to provide a tool for consumers to assess the tariff options available to them and enable them to make an informed decision. Therefore, it is essential that any accredited website provides consumers with as up to date and accurate a picture of the tariffs available as possible. With regards to the presentation of tariffs and price comparisons, the following set of principles apply:

Principles for tariffs and price comparisons:

1. The website provider must endeavour to include all tariffs offered by licensed suppliers that are available to the consumer, when presenting comparison results. If information on a tariff is publicly available, then it must be included by the website providers.
2. 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. 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.
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.
4. 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.
  5. 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.

#### Additional notes on the inclusion and presentation of tariffs

1. Where gas and electricity tariffs are offered in a dual fuel bundle, the gas and electricity prices must be shown separately, with details provided on the additional components of the tariff such as Direct Debit or eBilling.
2. The unit price for electricity and/or gas must be displayed as well as the annual standing charge and any other fixed charge included in a supplier's tariff.
3. Details of non-cash offers should be listed separately to the gas and electricity base prices.
4. The website provider must make all reasonable endeavours to obtain, update and ensure the accuracy of all data displayed on its website covering all licensed suppliers' tariffs.

## **2.3 Calculation of Price Comparisons**

It is essential that the calculation of any price comparisons gives impartial results that provide consumers with clear and accurate information. This allows them to assess what the best tariff for their needs is, promoting competition and switching. In order to ensure that website providers calculate price comparisons in a way that provides this information to consumers, accredited websites must adhere to the following principles:

#### Principles for website calculation of price comparisons:

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.
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.
3. 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)
4. The CRU reserves the right to review any new form of discount and issue accredited website providers direction as to how such discounts should be treated.
5. The website provider must display the details of a consumer's current tariff in the results page. This should be based on the information the consumer has entered. These details should include:
  - current supplier's name
  - current tariff name
  - unit rates / standing charges
  - current payment method
  - all discounts that are included in the calculation of the current tariff
  - estimated current spend (€) per annum
  - estimated current usage in kWh for gas and / or electricity per annum
6. The website provider should indicate to consumers if they are likely to incur a termination fee by switching from their current tariff.
7. The website provider should clearly indicate any tariff option that includes a fixed term contract or termination fee.
8. When comparing nightsaver tariffs a consumption split of 50% day and 50% night must be used (based on RMDS Standard Load Profile for domestic nightsaver).
9. 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 Accuracy and Updating Tariffs**

It is essential that consumers using an accredited price comparison website are given as up to date and accurate information on tariffs as possible. Website providers must therefore ensure that they regularly update their databases in line with the points set out below.

To ensure that website providers use the most up to date and accurate tariff information for price comparisons accredited websites must adhere to the following set of principles:

### Principles for website accuracy and updating of tariffs:

1. Website providers must update their tariff database on a regular basis to ensure that price comparisons are as accurate as possible. The date the tariffs were last updated must be stated on the website.
2. All tariffs offered by licensed suppliers that are publicly available should be included on the website and where possible new tariffs/suppliers should be added to the price comparison website within two working days of the details and confirmation of the effective date being made public.
3. A new tariff cannot be included on the website that has a lead time in excess of four weeks of it being available to consumers.
4. 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.
5. A message or link should be provided on the results page explaining how an estimated average price for each tariff is calculated.

6. 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.

## 2.5 Website Filter Options and Results

It is essential that when a consumer uses an accredited price comparison website they have a reasonable set of criteria to search for offers by and that the results they receive are comprehensive, accurate and ordered in the most appropriate manner.

Therefore, in order to ensure that the website provides appropriate filter options and results accredited websites must adhere to the following set of principles:

### Principles for website filter options and results:

1. Taking into account any relevant filters selected by the consumer, the results page of the price comparison list must provide (on a single page) all tariff options, with the cheapest tariff presented first. Where there are more than ten tariff options, at least the first ten must be shown on the first page and the website must also give consumers the option to view all other tariff options beyond the initial list.
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.
3. The results page should clearly show the requirements of each tariff option for example; payment method, dual fuel, expiry date, etc.
4. A service provider may provide filters so that consumers may search results based on the different types of tariff available or other criteria, for example green tariffs, but these must be opt-in options only.
5. A website provider may provide a filter option in the search page so that results can 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.
6. A website provider may provide a filter option in the search page so that the results show only those tariffs to which the consumer can switch by using the online links on the price comparison website. In order to do this the following must be included:

- There must be a clear statement in a prominent position at the top of the results page explaining that only those tariffs to which the consumer can switch online through the service provider's site are displayed on the results page.
  - There must be an option on the results page for the consumer to expand the results to show all tariffs. This should be easy to do and not involve the consumer having to re-enter details or return to a previous page.
  - This must not be the default position.
7. The website provider must clearly explain the potential impact to consumers who select an opt-in filter, so that consumers are fully aware of the bearing and limitations this may have on the results.

## 2.6 Green Tariffs

With regards to the treatment of tariff products labelled “green”, accredited websites must adhere to the following set of principles

### Principles for green tariffs:

1. Tariff offerings labelled “green” by suppliers must be included in price comparisons.
2. A website provider may offer a filter for tariffs that suppliers define as green.
3. If a consumer chooses to use a filter to search for green tariffs, then the website provider must list the tariff results in line with the principles set out above. They must also provide information on the green credentials claimed by the supplier.
4. 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.

## 2.7 Website Management

Accreditation websites must maintain control over the management of the website, including the tariff information and comparison calculator.

To ensure that this is the case accredited websites must adhere to the following set of principles:

Principles for website management:

1. The website provider must retain full control over the information content of the website and over the presentation of that content.
2. If the website is maintained by a third party the website provider will be held responsible for ensuring that the third party complies with the principles for accreditation.
3. The price comparison website may not be maintained by a third party that also manages another accredited price comparison website.
4. The use of accredited price comparison platforms on third party websites must be pre-approved 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.

Additional Notes on Website Management

1. Where an accredited website's price comparison platform is used on third party websites then all the principles of accreditation will be applied to that site and will be incorporated into all auditing processes. If the comparison platform on the third-party website does not comply with the principles of accreditation, then the rules around revocation of accreditation will apply to the primary website and any subsidiary websites.
2. Accredited websites must employ the services of an independent auditor each year to conduct a full review of their compliance with the principles of accreditation. Where accredited websites price comparison platform is used on third party websites then the annual audit must incorporate these third-party websites and review of their compliance with the principles of accreditation.

## **2.8 Consumer Information and Accessibility**

Accredited websites need to be accessible and understandable for all energy consumers. Therefore, the website provider must include an explanation of the various terms used on the website and ensure that information is presented in a clear and understandable manner.

To ensure that this is the case accredited websites must adhere to the following set of principles.

Principles for consumer information and accessibility:

1. The website provider must provide consumers with an explanation of the different payment methods shown on the website:
  - Standard credit by cash/cheque
  - Direct Debit
  - Prepayment
  - Any other payment methods included
2. Where possible on the site the website provider must use plain English, this applies in particular to any explanatory text.
3. Website providers should adopt Universal Design in all customer communications and front-line services no later than 1st January 2012.
  - Website pages and all attachments and functionality should be designed to meet the relevant accessibility guidelines from the W3C World Wide Web Consortium.
4. The website provider should endeavour to make the website understandable and accessible to all energy consumers.
5. The website provider must provide links to the relevant Terms and Conditions that apply to each of the tariffs listed on the website.
6. 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.

## **2.9 Customer Service Ratings**

The CRU is aware that in other jurisdictions price comparison websites may apply ratings to energy suppliers based on their customer service and therefore there is the strong possibility that website providers may want to incorporate such a feature into their websites in Ireland.

The CRU does not want to discourage innovation on the part of website providers and therefore will not be over prescriptive at this stage as to how such ratings would be incorporated into a price comparison website. However, it is important that any methodology used to measure customer

service levels is reasonable and fair, hence accredited websites must adhere to the following set of principles:

Principles for website customer service ratings:

1. Website providers may assign ratings to a supplier's performance and invite the consumer to consider quality of service issues as a comparison criteria.
2. Where a website provider does wish to assign such ratings, they must first seek approval from the CRU on the methodology used to assign ratings. This is to ensure that the methodology is reasonable and applied in an impartial manner.
3. 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.

## **2.10 Customer Care**

All accredited websites should be consumer focused and have established effective 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 principles:

Principle for website customer care:

1. The website provider must provide a link to [www.cru.ie](http://www.cru.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.

## 2.11 Data Protection

Price comparison websites that are easy to use and trusted by consumers are valuable tools in delivering cost savings to consumers; reducing confusion and promoting competition. It is therefore of the utmost importance that accredited websites handle consumer data appropriately. Accredited websites must adhere to the following set of principles where customer data is captured:

### Principle for data protection:

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.

## 3. Audit Process

### 3.1 Introduction

This section sets out the auditing procedure that the CRU view as being appropriate and necessary to ensure that accredited websites continue to meet the principles of accreditation and maintain the highest standards. Accredited websites will have to report on their compliance on an annual basis and in addition the CRU will conduct regular audits primarily covering tariff information and comparisons.

### 3.2 Annual Audit

In order to retain their accreditation, website providers will have to employ the services of an independent auditor each year to conduct a full review of their compliance with the principles of accreditation. With regards to the annual compliance report the following applies:

- The cost of conducting the annual compliance report is to be borne by the accredited website.
- The annual audit must be conducted by an auditor approved by the CRU. Accredited website providers must seek approval from the CRU on their choice of auditor in advance of conducting the audit.
- Accredited websites must also seek approval from the CRU for the audits terms of reference.
- The annual audit report must incorporate any third-party websites where an accredited

websites price comparison platform is used and report on its compliance with the principles of accreditation.

- The annual audit must be conducted, and the report submitted to the CRU within three months of the anniversary of accreditation.
- Following the submission of the auditor's report accredited websites must provide any additional information that the CRU requests.

### **3.2.1 Regular Audit**

A regular audit will be also undertaken by the CRU and will examine all accredited websites. The CRU will conduct regular audits once per annum.

Annex 1 of this document contains the checklist to be used in the regular audit and is based on the final principles of accreditation. The CRU will review each accredited website to ensure that they meet all of the points on the checklist. In addition, the CRU will run a number of dummy price comparisons to ensure that the results and data provided adhere to all the necessary principles.

This checklist will be available on the CRU website and the CRU may amend this checklist to take account of market developments. The CRU is aware that changes to the checklist may have implications for accredited websites or require amendments to their websites, therefore the CRU will notify all accredited website of any changes. Where necessary the CRU will allow sufficient time for website to make any required changes to their websites before changes to the checklist come into effect.

### **3.2.2 Ad Hoc Audit**

In addition to the regular audit the CRU may conduct ad hoc audits at any time during the year. An ad hoc audit may be carried out for any of the following reasons:

- Where concerns have been raised that an accredited website has breached any of the principles of accreditation.
- Where a new product or service is launched by a supplier or by a website provider.
- Any other circumstances in which the CRU deems it necessary to conduct an audit to ensure website providers are complying with all the principles of accreditation.

## **3.3 Audit Results**

The CRU is conscious of the potential that price comparison websites have in further developing competition in electricity and gas retail markets. As part of this it is imperative that consumers are confident in the impartiality of and in the search, results provided by accredited websites. Therefore, the CRU is committed to full transparency in the accreditation and auditing process.

### **3.3.1 Annual Audit**

As set out in Section 3.2, accredited websites are required to hire independent auditors to undertake a review of their compliance with the accreditation principles and submit a report to the CRU on an annual basis. In order to ensure there is full transparency in the process and to guarantee consumer confidence, the CRU intends on publishing these reports. The exception may be where there is confidential information in which case certain sections of the report may not be published. However, the onus will be upon the website provider to demonstrate to the CRU why any sections should not be published.

Where practicable, the CRU will publish the report along with the results of the next regular audit. However, if the CRU is undertaking further investigation or has requested additional documentation on the annual report this may be postponed.

### **3.3.2 Regular Audits**

The CRU will publish the results of all regular audits undertaken. Annex 1 of this paper shows the checklist, based upon the principles set out in this consultation document. As part of the published audits the CRU will include a version of this checklist indicating whether the accredited website was deemed compliant with each principle. It is envisaged that this would be published within six weeks of the audit.

Further to his checklist, the CRU may include any additional notes regarding compliance or additional checks undertaken.

## **3.4 Website Provider Obligations**

In order to receive accreditation from the CRU all website providers must commit to full co-operation with all audit processes. This entails:

- A declaration of compliance, which will be included as part of the application process for accreditation.
- The website provider must supply an annual independent audit within three months of the anniversary of receiving accreditation.
- The website provider must comply with all annual reviews as well as all regular and ad hoc audits conducted by the CRU.
- Website providers must provide the CRU with any information relevant to the accreditation principles requested.
- Website providers must provide information to the CRU in a timely manner.
- Meeting with the CRU, where requested, to discuss any queries or issues the CRU may

have with regards to the accreditation process.

In conducting any audits and in dealing with all matters regarding accreditation the CRU will endeavour to minimise the impact on the website provider's time and resources. However, if the CRU decides that a website provider is not providing all relevant information in a timely manner the CRU may deem this to be a breach of the accreditation principles and that it be dealt with under the approach set out in Section 4 of this document.

## **4. Revocation of Accreditation**

### **4.1 Introduction**

The purpose of the annual and regular audit process outlined is to ensure that websites adhere to the accreditation principles. Therefore, this section will address how the CRU will address situations where an accredited website is found not to be in compliance with any of the principles.

When auditing accredited websites, the CRU will classify infringements of the principles as being either minor or major infringements. This section sets out what constitutes each of these and how they will be treated.

### **4.2 Major Infringements**

The checklist in Annex 1 sets out the accreditation principles which will be reviewed during regular audits. A number of the principles are of particular importance and as such a breach of these would be viewed as being a major infringement of the accreditation principles.

The checklist items whose non-compliance would be deemed a major infringement are as follows:

- Independence from any gas or electricity supplier or affiliate.
- Information and data presented on the website must be impartial.
- Results must be presented in terms of best price.
- Identification on the website that commission or payment is received from suppliers.
- The website must not recommend an alternative supplier where a consumer cannot automatically switch online to their chosen supplier.
- No advertisements from energy suppliers may be displayed on the home page or on the energy price comparison pages.
- The website provider must manage and control the website and use its own tariff database and calculator.
- The website provider must retain full control over the information content and presentation. If managed by a third party, then the third party may not manage another

accredited price comparison website.

- Where the price comparison website is used on a third-party website approval must be given by the CRU.
- Results pages must clearly show the requirements of each tariff option.
- Approval must be given by the CRU on the methodology used to assign customer service ratings.
- There must be a clear indication of any tariff option that includes a fixed term contract or termination fee.
- A link to [www.energycustomers.ie](http://www.energycustomers.ie) must be displayed in an appropriate position on the website.
- Any decision by the Data Protection Commissioner that found the website provider in breach of Data Protection Legislation

Should the CRU find that an accredited website is in breach of any of the above, the provider will be contacted immediately. Where possible the provider must address the issue with immediate effect. If this is not possible then an explanation must be provided to the CRU why this is the case and a timeline for resolution set out.

#### **4.2.1 Revocation of Accreditation**

If the CRU is of the view that the infringement cannot be rectified this may result in the revocation of the accreditation. Under such circumstances the CRU will notify the provider that the accreditation has been revoked. The website provider will then have two days to remove all references to accreditation from their website. In addition, any references to accreditation in any advertising or other forms must cease with immediate effect.

Following the formal revocation of accreditation of any website provider the CRU will issue a public statement to this effect.

#### **4.2.2 Suspension of Accreditation**

Alternatively, if the CRU is not satisfied with the timeline for resolution set out by the website provider, accreditation may be temporarily suspended. Under such circumstances the CRU will notify the provider that the accreditation has been suspended. In line with the procedure for revocation of the accreditation the website provider will have two days to remove all references to accreditation from their website as well as ceasing to make any references to accreditation in any advertising or elsewhere.

In order to remove the suspension, the website provider must write to the CRU providing evidence that they are fully compliant with the accreditation principles.

## 4.3 Minor Infringements

The CRU considers the infringements set out above as being of a serious nature and as such there is a need to immediately address them. In addition to these a range of minor infringements are set out in the regular audit checklist which will be treated in a less urgent manner.

If the CRU, in conducting an audit or annual review, finds that a website provider has made a minor infringement of the accreditation principles it will list this in its report. In addition, CRU will also formally notify the website provider and ask them to make the necessary changes to address the infringement.

The CRU must be informed by the website provider of the actions they will undertake to rectify the situation and the planned timeline for action. Depending on the circumstances the CRU may conduct an ad hoc audit to ensure that the minor infringement has been rectified, or alternatively it may be checked at the next audit.

### 4.3.1 Repeated Infringements

The CRU will publish the audit checklist as part of all audit results, showing any infringements of the accreditation principles and providing any necessary details. The following is how the CRU will treat repeated infringements:

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

## 4.4 Other Infringements

As set out above the CRU views price comparison websites as forming part of the consumer's overall switching experience and therefore extremely important in terms of consumer confidence.

In addition to the above list of infringements, the CRU also reserve the right to revoke accreditation where an accredited website is found to have breached any relevant legislation and thereby bringing into disrepute the accreditation process.

## 5. Application Process and Costs

### 5.1 Introduction

In order to receive accreditation website providers are required to complete the application process with the CRU. This process will allow the CRU evaluate whether the provider fully adheres to all of the principles set out in the accreditation framework. The following sections sets out the process and costs involved in making an application.

### 5.2 Application Process

All applications for the accreditation of price comparison websites must be made directly to the CRU. All applications from price comparison websites must include the following:

- A detailed document demonstrating compliance with all of the principles for accreditation.
- A copy of the business plan.
- The application fee of €254.

The CRU will publish the application form alongside on its website, which applicant can download and complete. It is intended that this form, by providing a more detailed set of requirements, will provide guidance to applicants on what is required.

The CRU's will use the principles for accreditation as the basis for assessing any applications for accreditation. With regards to the application process the CRU will commit to the following:

1. CRU will acknowledge all applications within 7 working days of receiving them. The acknowledgement will include a phone number and a named contact for enquiries.
2. CRU will process all applications as quickly as possible and keep applicants advised of progress.

## 6. Annex 1- Audit Checklist

<b>Accreditation Compliance Report</b>			
<b>1 – Independence and Impartiality</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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
<b>2 – Inclusion and Presentation of Tariffs</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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
<b>3 – Calculation of Cost Comparison</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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	Regular	Minor	Yes/No
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
<b>4 – Accuracy and Updating Tariffs</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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
<b>5 – Website Filter Options and Results</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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	<b>Major</b>	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
<b>6 – Green Tariffs</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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
<b>7 – Website management</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
a – Website provider manages and controls website and uses its own tariff database and calculator	Annual	<b>Major</b>	Yes/No
b – Website provider retains full control over the information content and presentation	Annual	<b>Major</b>	Yes/No
c – This is the only price comparison website owned by this third-party.	Annual	<b>Major</b>	Yes/No
d – Approval given by the CRU where price comparison platform is used on third-party websites	Regular	<b>Major</b>	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
<b>8 – Consumer Information and Accessibility</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
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

<b>d</b> – Website understandable and accessible to all energy customers	Regular	Minor	Yes/No
<b>e</b> – Links to relevant terms and conditions for each tariff are provided	Regular	Minor	Yes/No
<b>f</b> – Signposting is provided to independent sources on energy efficiency with reference to the SEAI	Regular	Minor	Yes/No
<b>9 – Customer Service Ratings</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
<b>a</b> – Approval from the CRU on the methodology used to assign customer service ratings	Regular	<b>Major</b>	Yes/No
<b>b</b> – Methodology is:			
<b>b1</b> – Evidence-based and objective	Regular	<b>Major</b>	Yes/No
<b>b2</b> – Consistently applied across all suppliers	Regular	<b>Major</b>	Yes/No
<b>b3</b> – Refreshed within the past 12 months	Annual	<b>Major</b>	Yes/No
<b>b4</b> – Contains explanatory messaging for the ratings	Regular	<b>Major</b>	Yes/No
<b>10 – Customer Care</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
<b>a</b> – A link to <a href="http://www.cru.ie">www.cru.ie</a> is displayed in an appropriate position on the website	Regular	Minor	Yes/No
<b>11 – Data Protection</b>	<b>Frequency</b>	<b>Infringement</b>	<b>Compliant</b>
<b>a</b> – Compliant with Data Protection Legislation	Regular	<b>Major</b>	Yes/No