



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

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Comparison tools for Time of Use Tariffs

Consultation Paper

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Mission Statement

The CRU's mission is to protect the public interest in Water, Energy and Energy Safety.

The CRU is guided by four strategic priorities that sit alongside the core activities we undertake to deliver on the public interest. These are:

- Deliver sustainable low-carbon solutions with well-regulated markets and networks
- Ensure compliance and accountability through best regulatory practice
- Develop effective communications to support consumers and the regulatory process
- Foster and maintain a high-performance culture and organisation to achieve our vision

Executive Summary

Smart Meters are the next generation of electricity and gas meter and are being rolled out across Europe and internationally. This move to upgraded digital meters will provide consumers with better and more accessible information about energy consumption, access to new tariffs and services and reduce the need for estimated meter reads.

At present, with the installation of a special day/night meter, customers can get access to tariffs which enable them to save money by shifting some of their electricity consumption from daytime to night-time, when energy is cheaper. The Smart Meter upgrade will extend access to “time-of-use” tariffs to all electricity consumers with 48 time periods per day (every half hour) or Day/ Night / Peak, with peak being 5pm to 7pm. Eventually these time of use tariffs are expected to become the norm.¹

The transition to time-of-use tariffs, with different electricity rates depending on the time of usage during a day, is an important element of the Smart Meter upgrade and will play a crucial role in Ireland’s energy future by reducing costs and making supply more resilient and secure. This will be important considering increasing demand on the system through the electrification of heating and the growth in the use of electric vehicles. Time-of-use will incentivise consumers to shift consumption to times of the day when electricity is cheaper, enabling them to potentially save money. Smart Meters will facilitate the introduction of more renewables and microgeneration. The shift in consumption patterns should also reduce the requirement to increase investment in the grid and more peak generation capacity.

As part of this transition, CRU is considering the application of the Estimated Annual Bill for smart tariffs and whether the calculation methodology needs to be amended to ensure this comparison tool is useful for Smart Tariffs.² A specific proposal has been developed by CRU for this consultation, which involves the use of ESB Networks existing Load Profiles to create an Estimated Annual Bill (EAB) for Standard Smart Tariffs (SSTs), which will be available from 2021 to customers with a Smart Meter.

¹ As stated by the CRU in 2015 in its ‘Rolling out new Services: Time-of-Use Tariffs’ Decision Paper (CER/15/270).

² The current methodology is contained in the Supplier Handbook (Section 2.3). This is available here: [CRU 19/138](#).

Public Impact Statement

Smart meters are the next generation of electricity meters, replacing older analogue meters which, when fully operational, will deliver benefits for consumers, the environment and the economy. The National Smart Metering Programme involves the nation-wide replacement of over two million electricity meters over a six-year period.

The Smart Meter upgrade will transform how electricity consumption is measured, managed and paid for. The new systems and processes will provide consumers with more accurate bills and better and more accessible information about energy use.

New smart services and products will be introduced such as Time of Use tariffs and smart Pay-As-You-Go. This will enable consumers to take more control and make better informed decisions about their energy usage. As part of these changes, the Estimated Annual Bill will need to be changed to account for the new time-of-use tariffs.

The changes being consulted upon regarding Estimated Annual Bills directly impact the ease of a consumer switching electricity provider. Estimated Annual Bills provide the consumer with an easy comparison across different energy tariff plans. This enables consumers to quickly and easily compare different tariff plans across suppliers.

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Glossary of Terms and Abbreviations

Abbreviation or Term	Definition or Meaning
CEP	Clean Energy for all Europeans Package
EAB	Estimated Annual Bill, an estimate of what a typical customer's energy bill would be for one year on a given tariff
Flat-rate tariff or 24-hour tariff	An electricity tariff with the same rate charged for all consumption, regardless of the time of day
SST	Standard Smart Tariff (i.e. A tariff with variable rates depending on time. with a Day (08:00 to 17:00), Night (23:00 to 08:00) and Peak(17:00 to 19:00))
TOU	Time of Use, An electricity tariff which features different rates which vary by the time of day that electricity is used.

1.Introduction

1.1 Background-Smart Metering and Time of Use Tariffs

The Smart Meter upgrade is a project to transform how electricity and gas retail markets operate. Older, mechanical electricity and gas meters will be replaced with updated digital meters. These updated meters will provide many benefits for energy consumers by eliminating the need to use estimated meter readings, making new products and services available (e.g. time-of-use tariffs) and also empower consumers to make more informed choices regarding their energy needs by providing consumers with more granular information about their consumption. The upgrade to Smart Meters will also provide more information to the network companies to allow them better manage the grid and ensure security of supply.

The CRU's decision to rollout electricity and gas Smart Meters for all residential and smaller business consumers was announced in July 2012. This decision was made following comprehensive consumer behaviour and technology trials and in the context of the requirements of the European Third Package Directive provisions for the rollout of Smart Meters in Member States.³ The CRU, working closely with key project stakeholders, conducted further analysis on the design of the Smart Metering solution throughout 2013 and 2014. This culminated in the publication of the High-Level Design (HLD) in October 2014.

With the introduction of Smart Meters and Time of Use tariffs, there will be an impact on the way in which tariffs are presented to consumers. This paper seeks views on the adjustment of the existing tool used for this purpose (i.e. the Estimated Annual Bill, EAB).

³ For further information on the Third Package, see https://ec.europa.eu/energy/topics/markets-and-consumers/market-legislation/third-energy-package_en

1.2 Estimated Annual Bills and Load Profiles

In order to provide domestic and non-domestic customers with electricity, electricity suppliers must purchase electricity in the wholesale market. For large business customers, suppliers have more accurate information available to make these purchases because these large customers will more than likely have meters which record at more frequent intervals. This makes it easier for suppliers to accurately predict how much power is required for these large customers across each of the 48 individual 30-minute periods in a day.

However, as domestic meters are only read four to six times per year, an electricity supplier must estimate how much power to purchase at each time period to supply electricity to these customers. Therefore, a 'profile' is created for certain domestic customer categories.

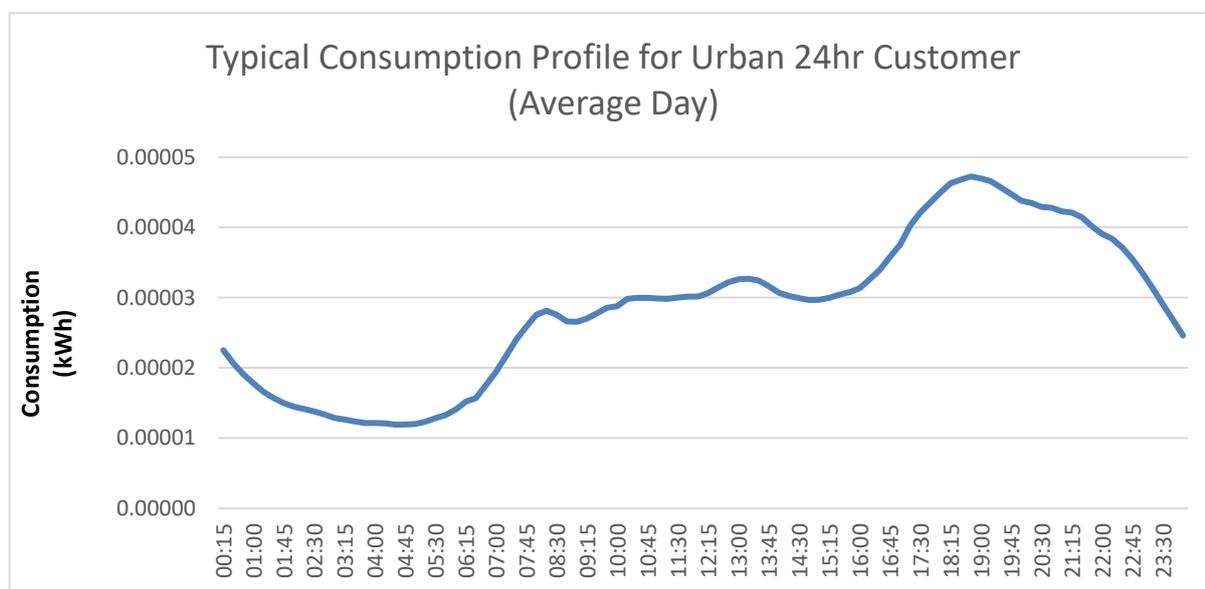


Figure 1: Typical Consumption Profile for an Urban 24hr Customer

The diagram outlines the typical consumption profile for an urban 24hr customer. It is shown that domestic customers consume more electricity during the 'peak' periods of 5pm-7pm. The cost incurred by the supplier to provide electricity at this time is charged to electricity customers in their bills. Evening peak hours (17:00 to 19:00) normally have the highest wholesale electricity prices in any given day. However, the cost is spread out across a customer's bill and therefore may not reflect the higher cost for suppliers of purchasing electricity at these times.

Time-of-use tariffs however will ensure that prices charged to domestic electricity customers are more reflective of the cost of serving that particular customer. For example, a domestic electricity customer who may not be 'peaky' (a "peaky" customer is one who uses a lot of electricity between 5pm-7pm) may be in a position to save money with time-of-use because they consume electricity at times of the day when electricity is cheaper. The corollary of this is that customers who use a significant proportion of their electricity consumption at peak times may face higher bills. These customers have an incentive to change their behaviour and move their electricity consumption to other non-peak periods.

ESB Networks has compiled a load profile, which can be used as a proxy for consumers consumption. The profile estimates a consumer's consumption based on their meter classification (e.g. Rural Domestic).

Using these load profiles, suppliers can estimate an average residential customer's consumption over the course of a year for each and every 30-minute period.

The profiles which exist currently are based on consumption from previous years, that is, using analogue meters. This will change once significant numbers of customers have smart meters installed, and profiles tailored to Smart Metered customers are assembled using actual aggregated data from these Smart Meters.

It is important to note that for many customers, this will not be an exact representation of their consumption. However, it is a standard one and is representative across the entire residential electricity market, which assists with the creation of comparisons such as the EAB.

1.3 Related Documents

- Rolling out new Services: Time-of-Use Tariffs' Decision Paper ([CER/15/270](#))
- Review of Supplier's Handbook ([CER 17/059](#))
- Review of Typical Domestic Consumption ([CER 17/042](#))
- Electricity and Gas Suppliers' Handbook 2019 ([CRU 19/138](#))

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

1.4 Structure of Paper

- **Section 1** contains the introduction, background information and related documents for this consultation.
- **Section 2** lays out the issues related to the Estimated Annual Bill
- **Section 3** gives details to respond to this consultation
- **Appendix 1** gives the detail on proposed updated to the text of the Supplier Handbook

1.5 Responding to this Consultation

Responses to this consultation should be returned by email to Smartmetering@cru.ie or post by close of business on the 19th of October 2020 and marked with the reference CRU20/108

2. Estimated Annual Bills (EABs)

The CRU requires all electricity and gas Suppliers to set out an “Estimated Annual Bill” (EAB) figure for each of their offers. This figure indicates an estimated annual bill for that particular product and is based on CRU published average annual consumption figures to which Suppliers then apply their own Price Plans to calculate the EAB. It is worth bearing in mind that the EAB is an estimate and is intended as a comparison tool for consumers.

The EAB was introduced as a requirement on suppliers in the 2017 review of the Electricity and Gas Suppliers’ Handbook⁴. This tool was introduced to assist consumers in comparing energy offers and must be included on all marketing material published by suppliers that references prices or tariffs. The EAB has been shown to be effective in assisting consumers with making decisions as detailed in ESRI research.⁵ This research showed that consumers were more likely to understand and choose the cheapest option for them when presented with an EAB in adverts. This simplification has enabled easier switching for consumers. Price Comparison Websites also use the EAB as a way of presenting the information to consumers. This means that a second source of consumer switching also uses EABs, aside from direct contact with suppliers.

With the introduction of Smart Services from 2021, consumers will be able to avail of a Time-of-Use tariff and need to be informed about these new products. From 2021, these tariffs will be made available by suppliers to those consumers with Smart Meters installed. Suppliers must offer a Standard Smart Tariff to all customers with a Smart Meter installed. It is vital to ensure that these tariffs are understood by consumers. This is necessary to ensure consumers are protected and can receive the full benefits of Smart Meters.

The estimated annual bill can be used by consumers, price comparison websites or suppliers to compare tariff offers or other marketing comparisons across different suppliers. The EAB is calculated using a typical consumption figure defined by the CRU. The current level of 4,200kWh was approved by CRU in 2016 (see [CER 17/042](#)). This figure is used for the calculation of EABs by suppliers. This figure is based on 24-hour flat tariffs, which applies to the majority of residential electricity customers in Ireland. This assumes the

⁴ See CER17/059, *Review of the Suppliers Handbook*

⁵ See ESRI Working Paper 543, Price Transparency in Residential Electricity; Experiments for Regulatory Policy, Available at <https://www.esri.ie/system/files?file=media/file-uploads/2016-10/WP543.pdf>

customers consumption is the same in any 24-hour period. This will need to change as the Standard Smart Tariff is introduced given that it differentiates between consumption periods during a 24-hour period, more specifically a Day, Night, and Peak. This is done to a limited extent already, as some residential customers have a Day-Night meter, which provide a different electricity rate depending on whether the energy is used at night or during the day.

The EAB calculation is particularly helpful where a consumer has not provided their own actual consumption information as it provides a generic quote for an energy tariff offer which enables them to compare the offers available to them.

This requirement to use Estimated Annual Bills, and the method to be used in their calculation by suppliers is contained in Energy Suppliers' Handbook, available [here](#).

In the 2019 review of the Energy Suppliers' Handbook the CRU noted that the requirement for the application of the EAB to Time of Use (ToU) Tariffs would be defined later but before these tariffs become available to consumers in 2021. Therefore, this consultation is seeking views on ways to ensure the customer benefits of using the EAB are retained with the introduction of ToU Tariffs.

2.1 Proposal for consideration

The EAB has proven very useful to consumers in comparing the tariffs offered by suppliers.

Over time, with the introduction of Smart Meters and the additional data shared with suppliers, consumers will begin to see new, more personalised energy products come to market. This will start with the Standard Smart Tariff, a time-of-use tariff which all suppliers will, as a minimum, be required to offer to customers with a Smart Meter. These products will help consumers manage their own energy use and save money.

The decision will be included in the Supplier Handbook, which will be reviewed in 2021. Section 2.3.3 of the Supplier Handbook, which refers to EABs, is part of the requirements for suppliers Code of Practice on Marketing and Advertising. Therefore, suppliers may have to update their Code of Practice on Marketing and Advertising to reflect the decisions arising from this consultation process.

CRU has developed the following proposal for the EAB:

2.1.1 EABs would only apply to the Standard Smart Tariff

The Standard Smart Tariff, which all electricity suppliers must offer from 2021 differs from the 24hr flat tariff most customers currently avail of. As stated above, currently a minority of residential customers are day-night metered customers, who have a different price for electricity depending on whether it is daytime (i.e. 08:00 to 23:00) or night-time (i.e. 23:00 to 08:00). With a standard Smart Tariff, an additional “peak” pricing period is added. Put simply, instead of a single price for electricity at all times, the SST price will be based on three time periods, with varying rates: Day (08:00 to 17:00 and 19:00 to 23:00), Night (23:00 to 08:00) and Peak (17:00 to 19:00).

As such, calculation of an EAB will have to be different with the Standard Smart Tariff than with the current flat rate tariffs, even though the typical consumption figure for a residential electricity customer is unchanged.

As noted above, ESB Networks have compiled a profile for residential electricity customers using Standard Smart Tariffs on the basis of typical historic consumption patterns.

Using these load profiles, the suppliers can estimate an average residential customer’s consumption in each of the three time periods, Day, Night and Peak, over the course of a year.

Using that average consumption in each period, the supplier can then apply its applicable tariffs to those consumption rates and calculate an estimated annual bill.

This calculation could be completed for customers availing of the mandated SST.

Consumers on bespoke or more varied plans, as seen in other markets would not be able to compare their offer directly using the EAB. CRU will monitor the market and consider whether an EAB for more personalised tariffs is needed in future.

While this would sacrifice some of the accuracy in comparisons for some customers, this is already acknowledged to be the case with EABs as they exist currently. It is felt, however, that this loss of accuracy is more than made up for by the benefits of EABs.

For ease of comparison, the follow table outlines the differences with EABs as they exist currently and how they will operate should the proposal be implemented for residential customers:

Characteristic	Current EAB (24 hr flat tariffs)	With proposal (SSTs)
Average Annual Consumption	4,200kW/h per year	4,200kW/h per year
No. of tariff bands per day	1	3 (Day, Night, Peak)
Use of Load Profile	No	Yes
Source of Consumption Figures	Review of Typical Consumption Figures Decision Paper CER/17042	Review of Typical Consumption Figures Decision Paper CER/17042 combined with ESBN SST Customer Load Profile

2.2 Proposed Changes to the Code of Practice on Marketing and Advertising

As noted above the changes suggested under the proposal would be applied in the Supplier Handbook (See Appendix 1 for details).

The Supplier Handbook will next be fully reviewed in 2021, after the introduction of time-of-use tariffs. In the interim, an information note/general clarification would issue alongside the decision paper to reflect that these changes are now considered to be mandatory for all suppliers.

Q1: Please set out your views on the proposal in this paper. Where relevant please set out alternative options that the CRU should consider for a revised Smart Tariff EAB?

Q2: One of the issues that may require consideration is how an EAB calculated using an SST profile may compare to an EABs using the existing profile (flat 24hr tariff). CRU is seeking views from stakeholders on this.

3. Next Steps

The CRU is seeking views from suppliers, consumer interest groups, industry groups, members of the public and all other interested stakeholders regarding the proposed changes.

While we are seeking views on the questions posed above, CRU would also welcome broader feedback on EABs in the new environment created by Smart services.

Following the consultation period, the CRU will review all responses received and develop a decision paper setting the new requirements for the Smart Tariff EAB.

Responses can be sent to Smartmetering@cru.ie by the 19th October 2020.

Appendix 1: Proposed Changes to Text of the Electricity and Gas Suppliers' Handbook

As a result of the changes proposed above for EABs, there will need to be changes to the text of the suppliers' handbook, specifically the requirements for suppliers' Code of Practice on Marketing and Advertising.

The proposed amendments to the text are included below in track changes (red text);

2.3 Presentation of Information on Marketing and Advertising Material

2.3.1 Suppliers are required to ensure that the minimum information outlined below is included on all marketing and advertising material. This includes but is not limited to TV, radio, newspaper, social media and online advertisements, sales / retention calls by phone or door to door, suppliers' websites, leaflets, brochures, posters, banners, and third parties' marketing and advertising platforms promoting energy offers. Footnotes may also be used for details of the offer e.g. unit rate, standing charge, PSO levy, etc. Minimum information required:

- a. Reference to all charges applicable to the offer (i.e. unit rate, standing charge, prepayment charge) and where to access information on these charges;
- b. The estimated annual bill figure; ~~excluding Time-of-Use tariffs.~~
- c. Where the offer involves discounts or savings presented either in percentages or actual amount, the information must disclose how discounts/savings are calculated and how they apply;
- d. The date when all tariffs presented or referred to in the advertisement were in place and that prices are subject to change;
- e. The validity period for the offer. If the end date is unknown, the 'valid from' date should be included;
- f. Duration of fixed term contract (if applicable);
- g. Reference to early termination fees, where applicable;
- h. Reference that T&Cs apply and how to access the T&Cs.

2.3.2 For the avoidance of doubt this requirement (Section B: 2.3.1) does apply to digital marketing through channels including, but not limited to, advertisements presented on search

engines such as Google and advertisements presented on social media sites such as Twitter, Facebook, YouTube, Instagram or LinkedIn⁶. However, the CRU recognises that the dynamic nature of digital marketing, and social media advertising, lends itself to a more flexible presentation of the mandatory product information. Therefore, for the purposes of compliance with Section B: 2.3.1, the CRU recognises the presentation of mandatory information can also be delivered through the use of dynamic or 'clickable links' which easily, and instantaneously, bring customers from the initial digital advertisement through to the supplier's website where the complete set of mandatory product information is available. This means that through one click on the advertisement, the customer is brought to a page containing all the information which is required by the Supplier Handbook. Please note that this guidance will be kept under review from the perspective of the customer experience.

2.3.3 Estimated Annual Bill Figure - Non Time of Use Tariffs:

Suppliers are required to ensure that the information provided to customers in relation to the Estimated Annual Bill is in accordance with the following requirements, excluding Time-of-Use Tariffs.

The requirements for EABs for Standard Smart Tariffs are listed in section 2.3.4 below. Other time of use tariffs are excluded from the requirement for the calculation of EABs.

- a. Suppliers are required to display the Estimated Annual Bill on all marketing and advertisements which promote a specific energy offer(s), or include any reference to price / tariffs, discounts, savings or cost. Suppliers are not obligated to present the EAB when these topics are not presented. Footnotes may be used to provide detail or a link to relevant information on the EAB.
- b. Suppliers are also required to communicate or display the Estimated Annual Bill on all adverts including TV and Radio advertisements.
- c. Suppliers are obligated to utilise the following methodology when calculating the Estimated Annual Bill:
 - I. Must be based on updated average consumption figures approved by the CRU
 - II. Must include all energy costs such as unit rate, standing charge, PSO levy, etc.

⁶ In line with the CRU General Clarification on the Code of Practice on Marketing and Advertising CRU/19071

- III. Must not include monetary value attributed to non-energy related elements by suppliers, their representatives or third parties e.g. loyalty points, non-cash vouchers, cash-back offers, etc.
- d. Suppliers are also required to calculate the Estimated Annual Bill based on the following:
 - I. Where a specific tariff is presented / referenced the EAB must be calculated based on that tariff, or;
 - II. Where a specific tariff is not presented / referenced, the EAB must be calculated based on the most relevant standard tariff to the consumers that can avail of the offering.
- e. Suppliers are required to display the Estimated Annual Bill on all marketing and advertising material as follows:
 - I. The Estimated Annual Bill should be displayed in the main body of the advertising or marketing material, in a prominent position, and is not to be displayed only in footnotes;
 - II. The font of the Estimated Annual Bill figure should be no smaller than the second largest font in the main body of the advertising or marketing material;
 - III. Details of the definition of the Estimated Annual Bill, method calculation, etc. can be displayed in footnotes or a reference can be made to more information located on the supplier's website.

2.3.4 Estimated Annual Bill Figure - Standard Smart Tariffs

Other time of use tariffs are excluded from the requirement for the calculation of EABs.⁷ -For Standard Smart Tariffs, the requirements for EABs are as follows:

- a. Suppliers are required to display the SST Estimated Annual Bill on all marketing and advertisements which promote a specific energy offer(s), or include any reference to price / tariffs, discounts, savings or cost. Suppliers are not obligated to present the EAB when these topics are not presented. Footnotes may be used to provide detail or a link to relevant information on the EAB.

⁷ This footnote will refer and link to the decision paper, once it is published.

b. Suppliers are also required to communicate or display the SST Estimated Annual Bill on all adverts including TV and Radio advertisements.

c. Suppliers are obligated to utilise the following methodology when calculating the SST Estimated Annual Bill:

IV. Must be based on updated average consumption figures approved by the CRU

V. Must include all energy costs such as unit rate, standing charge, PSO levy, etc.

VI. Must not include monetary value attributed to non-energy related elements by suppliers, their representatives or third parties e.g. loyalty points, non-cash vouchers, cash-back offers, etc.

d. Suppliers are also required to calculate the SST Estimated Annual Bill based on the following:

I. In all cases, calculations must use the most recent applicable Load Profile created by ESB Networks for customers average consumption in each time band (Day, Night or Peak)

II. Where a Standard Smart Tariff is presented / referenced, for any tariff time period, the SST EAB must be calculated based on that tariff

e. Suppliers are required to display the SST Estimated Annual Bill on all marketing and advertising material as follows:

IV. The SST Estimated Annual Bill should be displayed in the main body of the advertising or marketing material, in a prominent position, and is not to be displayed only in footnotes;

V. The font of the SST Estimated Annual Bill figure should be no smaller than the second largest font in the main body of the advertising or marketing material;

VI. Details of the definition of the SST Estimated Annual Bill, method calculation, etc. can be displayed in footnotes or a reference can be made to more information located on the supplier's website.

2.3.5 Suppliers are required to make customers aware of any change in conditions which may occur once the period of the promotion / offer expires, or of any additional terms, conditions or

charges which may be associated with the promotion in advance of the customer signing up for it. Where changes in conditions are not known at the time of sign up, the customer must be informed in writing (by email or post) of these changes in advance of their coming into effect and no less than 30 days before the end of the promotional contract.

2.4 Comparisons

These requirements are in addition to the other requirements outlined in this section.

2.4.1 Any comparisons between tariffs must be based on the customer's actual annual consumption or the Estimated Annual Bill, (for both a flat-rate tariff EABs or a Standard Smart Tariff EABs) and include all other applicable charges (i.e. variable and fixed charges, such as standing charges, prepayment charges, levies, taxes) and energy related discounts (such as cash backs or cash refunds) but exclusive of non-energy related elements (such as loyalty points, vouchers, free or discounted products or services).

2.4.2 Where a supplier is aware that they are comparing their tariff to a tariff that is due to change within the next three months, they must notify the customer of this fact.

2.4.3 Where a supplier compares its tariffs to competitors' tariffs, the following rules must be adhered to:

- a.** The comparison must be conducted on a like for like basis;
- b.** Information must be dated to show when all tariffs presented were in place;
- c.** Customers must be made aware that the competitor's tariffs are subject to change.

2.4.4 Where a supplier is offering discounts or claiming savings based on their own standard unit tariff or a competitor's tariff, it must ensure that the savings amount advertised is achievable/realisable by the customers/group of customers at whom the advertisement is directed.

2.4.5 Where a supplier is offering discounts based on their own standard tariff or a competitor's tariff, those discounts should set out clearly any difference in all charges, including standing charges and prepayment charges that the customer will have to pay.

2.4.6 Where a supplier's fixed rate tariff contains components which are or may be subject to change, this must be highlighted clearly in any sales literature and customers must be made aware that these components, are subject to change and may impact the final tariff

2.5 Presentation of Information on Tariffs

Suppliers are required to adhere to the following requirements when presenting information on tariffs:

2.5.1 Display tariffs inclusive and exclusive of VAT on a per unit basis.

2.5.2 Show all fixed charges, including but not limited to standing charges and pre-payment charges that apply to that tariff as an annual amount inclusive and exclusive of VAT.

2.5.3 All energy related charges (variable and fixed charges) should be presented alongside any discounts on unit rates in the same text and font size. Footnotes may be used for details of the offer e.g. unit rate, standing charge, PSO levy, etc.

2.5.4 Show the Estimated Annual Bill (for both a flat-rate tariff EABs or a Standard Smart Tariff EABs) associated with each tariff, where appropriate, as detailed in Section 2.3.2 (See Appendix A for examples).

2.5.5 Discounts must be set out clearly in cent per kWh. Discounts offered off the standard unit rate must be calculated and displayed incrementally or shown as a cumulative discount (See Appendix A for examples).

2.5.6 Where a supplier also wishes to present their tariff on a full year basis, the annual industry agreed consumption figures as approved by the CRU from time to time should be used.

2.5.7 Where a supplier is displaying day/night tariffs on a full year basis the number of day and night units must be clear and may be approved by the CRU from time to time.

2.5.8 A supplier must also separately display any additional levy or charge which applies to the account inclusive and exclusive of VAT.

2.5.9 Where a supplier is offering a dual fuel bundle, the gas and electricity tariffs should be shown separately with details provided on the additional components of the tariff.

2.5.10 Where a supplier offers a 'green tariff' the supplier must set out the credentials of the tariff. For example, explain how the tariff is green and differs from their other tariffs.

2.5.11 Where a supplier offers a Time-of-Use tariff, such as the standard smart tariff, the unit rates and associated time bands must be clear.

2.5.12 Where a supplier offers a tariff with a structure that differs from that described herein, the supplier is required to seek approval from the CRU directly on a suitable presentation. For

example: if the supplier wishes to offer a variable tariff with a unit rate that may change weekly, this may require presentation in a different way.