

CEER Public Consultation on 2021 Guidelines of Good Practice on Comparison Tools

A Eurelectric response paper

February 2022

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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KEY MESSAGES

- We believe information about the CTs should be readily available to consumers, but the bill is not the most appropriate place for that information
- There is concern around protection of consumer data and the ability for informed consent of consumers when it comes to automatic switching
- We feel the focus of the ranking systems should be on objective parameters, like expected price for the consumer, but additional relevant information about each offer should be available for the customer to assess
- The algorithm for CTs should be made public and should clarify how the CT develops its ranking
- There should be separate sections within CTs for different price structures with clear information about the conditions of the different offers (e.g., fixed price contracts, dynamic price contracts)

The purpose of the consultation paper is to present a preliminary review of the Guidelines of Good Practices (GGP) on Price Comparison Tools initially published by CEER in July 2012 and updated in 2017.

In this public consultation, **CEER presents its updated/new 20 recommendations**. The updates take into account the adoption and entry into force of the recast Electricity Directive 2019/944, which includes specific provisions regarding comparison tools, as well as the continuing technological and market evolution of the energy sector.

In line with its public consultation practices, the responses received will be discussed within CEER and if feasible taken into account to enhance the final guidelines of good practice.

This consultation will be **open until Tuesday 17 February 2022**. If you have any queries relating to this consultation, please contact the CEER Secretariat: tel. +32 (0) 2788 73 30 or email: brussels@ceer.eu

I. Independence

"Any comparison tool (CT) must be independent of energy supply companies, giving the user a non-discriminatory overview of the market. The provider of a comparison tool should show all information in a **clear, simple and consistent way**".

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric welcome the CEER proposal on the independences of CTs as well as the additional provision of clear, simple, and consistent information.

Relevant provision:

Article 14 (1) (a): The tools (...) shall be independent from market participants and ensure that electricity undertakings are given equal treatment in search results.

[Recast Electricity Directive 2019/944](#)

Ensuring the reliability of CTs is crucial to protecting and empowering customers. The best way to achieve this goal can be efficiently defined at national level, taking into account the maturity and competitiveness of both the comparison market and the energy market, and could be implemented with the active role of NRAs or other public bodies.

NRAs or another public body may also decide to establish their own reliable CT service where no private service exists or to complement commercial CTs and may consider ways to promote the service to customers.

Information about the availability of CTs should be found on consumer bills or by other means, making it possible for the consumers to easily find and access the CTs.

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric does not agree with the proposal regarding the availability of CTs within the consumer bills.

Eurelectric believes emphasis should be placed on informing and educating consumers on the availability and role of CTs and that digital solutions should be available to facilitate customers' access to CTs.

The regulatory oversight of CTs should be ensured by the National Regulator(s) or by a body that is structurally and financially independent from the CT owners (e.g., a statutory consumer body, the relevant Ministry, or an external auditor).

Relevant provision:

Article 14 (1): Customers shall be informed of the availability of such tools in or together with their bills or by other means.

Article 14(2): The tools (...) may be operated by any entity, including private companies and public authorities or bodies.

Article 14(3): Member States shall appoint a competent authority to be responsible for issuing trust marks for comparison tools that meet the requirements.

[Recast Electricity Directive 2019/944](#)

"When offering new services like automated switching, CTs must ensure that such business models are in line with existing consumer rights. Moreover, these new services imply a higher need for transparency, as the service provider has more information than the consumer and relevant contractual relations with suppliers need to be clear for consumers. This is increasingly relevant in situations where the CT signs contracts on behalf of the consumer, which should also fit with the preferences of the consumer. The consumer should be informed in advance before automatic switching takes place and must agree to the switch."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric is highly concerned about the potential problems with consumers' consent accreditation associated with automatic switching agreements. The CT's aim is to inform consumers and empower them without making a choice in the market. Automated switching activities raise concerns in terms of consumer rights and consumer awareness, and any future WU-level regulation on this should be thoroughly and cautiously considered. As the Commission, together with other institutional bodies, have in their agenda defining the rules to the Implementing Acts on customer switching, we consider that such early recommendations will create confusion at Member State level. We agree with the above text "the consumer should be informed in advance before automatic switching takes place and must agree to the switch," and "information on contract and conditions" should be added to this language. Any possible national platform which could allow switching should be separated from those which enhance consumers' information and should follow EU rules and guidelines, which are still being defined.

We feel the services which provide automated switching are harmful to the proper functioning of the market. They will encourage intermittent supply offers, which are not in line with and are even in opposition to customers' expectations of visibility and price stability.

We are also concerned that automated switching will entail high risks for the customer. Such offers will tend to favor only the price criteria and may not be inclusive of all essential customer criteria (e.g., the validity period of the price) or expected contractual types of arrangements to provide full customer satisfaction. Customers should not be engaged in such offers without proper consent and without sufficient information.

There is also appears to be a conflict of interest between customers' interest and part of such platforms' interest if the latter are remunerated though switching, including a risk of recommending switching contracts which are not in the best interest of the customer. We recommend that the presentation of offers with automated switching should not be authorized in the CTs.

II. Transparency

"CTs should disclose the way they operate, their funding and their owners/shareholders, in order to provide the customer with transparent information on the impartiality of their advice. This information should be presented in a clear way to customers **before the results of the comparison simulation are shown.**

Advertisement(s) and/or sponsored products should be clearly identified and separated from the comparison results."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric thinks this recommendation is a step forward with respect to previous recommendations. CTs should not mislead consumers by hiding information and should always disclose the potential fees or payments they receive from suppliers in case of a switch. We also feel that CTs should make the algorithm used for their comparison simulators public. We feel these guidelines should be overseen by the NRAs.

We also believe that CTs should be as exhaustive as possible, and not just compare prices, but also the quality of the services and the main features of each product (e.g., contract duration, payment options, source of electricity, and the availability of value-added services).

We consider this recommendation is mostly relevant in cases when CTs (as referred to in Art. 14.1 of the Directive) are not run directly by the NRA or another public body. It should be highlighted that all of these proposals are extremely important to ensure the appropriate functioning of CTs. In some Member States, suppliers can scarcely apply to commercial CTs which are not under the jurisdiction of the NRAs and are those which make the significant increases in terms of switching. Non-institutional comparators, given their commercial nature, tend to act in a less transparent way, often favoring the offers of operators who pay for high placement in commercial CTs' ranking. A way to prevent this from continuing would be to make the algorithm used for their price simulators public, so the nature of the sponsorship is clearly evident to customers.

Relevant provision:

Article 14(1)(b): The tools (...) shall clearly disclose their owners and the natural or legal person operating and controlling the tools, as well as information on how the tools are financed.

[Recast Electricity Directive 2019/944](#)

III. Exhaustiveness

"CT coverage of the market should be as complete as practicable. If the information presented does not offer a complete overview of the market, the CT should clearly state this before showing the results of the comparison simulation – **if feasible, also naming the missing supplier(s)** – as well as on the comparison results screen.

All prices and products covered by the CT and available to the customer on the basis of general selection criteria (e.g. the area where the supply is located, or a given customer segment) should be shown as a first step in the comparison results screen."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric supports this provision with the aim of customer empowerment. It may be difficult to enforce this in a fragmented market. However, each CT should make clear how complete its overview is of what the market offers, especially by mentioning what is not part of the comparison.

CTs should be as exhaustive as possible, and we recognize collecting all types of offers may be technically challenging for these tools. Neutral and independent CTs, those run by an ombudsperson or public authority, must at least present all available offers in an exhaustive manner. They should follow some objective rules which take into account the relevance of offers, i.e., representativeness of offers in terms of location (national vs. local), or in terms of market share. To enhance transparency, the selection criteria of suppliers and offers included in the CT should be readily available to customers before ranking is viewed.

Relevant provision:

Article 14(1): Member States shall ensure that at least one tool covers the entire market. Where multiple tools cover the market, those tools shall include, as complete as practicable, a range of electricity offers covering a significant part of the market and, where those tools do not completely cover the market, a clear statement to that effect, before displaying results.

[Recast Electricity Directive 2019/944](#)

IV. Clarity and comprehensibility

"Costs should always be presented on the primary output screen in a way that is clearly understood by the majority of customers, such as total cost on a yearly basis or on the basis of

the unit kWh-price. Any discounts should be clearly described, specifying when those discounts end; discounts which are subject to conditions or restrictions should be clearly separated from total cost estimation.

CTs should clearly indicate that prices shown as a total cost are an estimation, as they are based on historic or estimated consumption and on price information available at present. The same warning should be indicated where a CT offers an estimation of potential savings that might be obtained by switching to listed offers.

Access to additional information on cost details (e.g. unit prices, cost components...) and on the methodology used for total cost or potential savings estimation should also be made available to customers."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric feels this recommendation could use some technical clarifications. We feel that the CTs should be clear in what the pricing is from each supplier, what is added on by third parties (e.g., taxes, levies, and charges), and where discounts are available, what the discounts are (ad hoc, per kWh, monthly, by percentage, or otherwise) and what are the conditions a customer must fulfill in order to benefit from the discount. These offers can become very complex, so we are also concerned that the CTs may not be able to provide a clear, concise, and accurate overview of all available offers. It is important to note that consumers see prices, not necessarily costs, therefore this recommendation should be referred to prices and not costs. Furthermore, we also believe that the comparison should in primis be based on price, but also include other dimensions of the offer (e.g. additional services) that should be represented and considered in the ranking.

As an example, "*Portale Offerte*", the public CT in Italy, provides both information: at first offers are ranked based on the expected annual cost, and then, when the customer clicks on one offer, the consumer can get detailed information on the energy unit price and on the other components of the final price.

Also, comparisons should be homogeneous, not mixing past prices based on the spot market with future prices, as could happen in Spain, where several offers are linked to spot price evolution.

In the end all this information should be clear to consumers using a CT and they should easily understand the comparison, the result and the underlying information.

"Fundamental characteristics of all products should be presented on the first page of the result screen, adopting appropriate graphic or hypertext solutions to facilitate visibility and comprehension.

This information should refer both to price (for example, fixed or floating price; time of use or flat price...) and to other fundamental features (for example, main contractual terms, bundled services or products, origin of energy production...).

Explanations of the different characteristics should be available as second-level information to help the customer understand their options."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric believes the initial information provided to the customer should be as concise as possible, to prevent confusion and hinder a customer's ability to effectively compare between suppliers. The validity period for an offer and the duration of the contract should be included as primary information along with price. The more detailed contractual information should be

available though a “more detail” function. It is widely recognized that an excess of information can overwhelm and disengage consumers, thus, it is important that additional explanations and second-level information be useful to the customer without confusing them.

"CTs should offer additional information on the listed offers, in case the consumer wishes to use such information to help them choose the best offer **to suit their needs**. Where additional information based on subjective parameters is offered (for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.), the CT should clearly disclose the nature of the information, the parameter used and the origin of the underlying data, in order to favour customer awareness. **Pre-settings of the search tool must be clear for and adjustable by the consumer. When offering any results in a “Position 0”** (promoting an offer before the first placed ranking), **the selection criteria must be clear for the user.**"

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric feels the recommendation could be improved by focusing only on objective parameters including price, the guaranteed delivery period and duration of the price application, the conditions for price changes, additional services, permanent conditions, and penalties. However, parameters which do not apply to all consumers equally should no be considered for a position 0.

For overall search criteria, we would recommend the following items be included: the product name and its main features, as well as the product's level of disclosure of energy sources (as required in the revised Electricity Directive), and where relevant, a clear description of promotions (e.g., temporary discounts) and additional services (e.g., maintenance, insurance); total price (whether it is fixed or variable), which includes all cost components, and conditions for price changes; the contract duration, notice period for renewal and withdrawal, and conditions for termination, including fees and penalties as they may apply; and payment frequency and available methods.

V. Correctness and Accuracy

"Price information used in the comparison should be updated as often as necessary to correctly reflect prices available on the market.

CTs should rectify without delay any incorrect information on published offers. In order to achieve this, they should provide a quick and effective procedure allowing any interested party to report incorrect information."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric welcomes this proposal. However, the collection of data about price information should be the responsibility of the CTs based on the IT systems and commercial documents made available by and shared by suppliers.

We would like further clarification on how the veracity of offers on the CTs will be confirmed.

Relevant provision:

Article 14(1)(e) and (g): The tools (...) shall provide accurate and up-to-date information and state the time of the last update;
they shall provide an effective procedure for reporting incorrect information on published offers.

[Recast Electricity Directive 2019/944](#)

VI. User-friendliness

"Customers should be allowed to introduce their consumption data in a simple and friendly manner. In addition, CTs should offer help through default consumption patterns or, preferably, using a tool that calculates the approximate consumption, based on information available to **and that can be easily provided** by the user."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric supports this recommendation, as we support the principle of inclusiveness and believe no one should be left behind. We only caution against models that would steer customers to certain yearly costs which don't match their actual situation.

Relevant provision:

Article 14(1)(d): The tools (...) shall use plain and unambiguous language.

[Recast Electricity Directive 2019/944](#)

VII. Accessibility

"To ensure an inclusive service, at least one additional communication channel (other than the internet) for accessing a comparison should be provided, free of charge or at minimal cost. This **channel should take into account all the digitally excluded persons who are excluded by choice or by default. For example, comparison information could be made available via local authorities, citizen information offices, consumer associations or other bodies.**

Also, customers with disabilities (e.g. visual and/or hearing impairment) must not be left behind and should have access to a comparison tool. In this regard, CTs could provide integrated accessibility options such as sound amplifiers, magnification tools and features to increase the font sizes as well as colour correction for colour blindness, voice accessibility for the blind and the visually impaired consumers.

Whenever possible, CTs should adapt to the continuing development of technological devices

(smart phones, tablets, new gadgets...) in order to be accessible for customers in the widest variety of forms with the same level of accuracy."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric finds this recommendation sufficient, so long as it refers explicitly to public authorities providing help to customers who need other forms of access. We feel this could be adequately treated with national social policy.

We strongly believe that EU's energy transition should be inclusive for also combating the effects of energy poverty, and therefore the collaboration between the private sector and the public sector is essential. In the energy transition a new and reinforced relationship with consumers should be managed, both through digital and traditional channels, such as in-shop offers. There should not be a differentiation from suppliers' offers between online or offline channels.

As an example, in Italy, *Sportello del Consumatore* (the free telephone service run by the NRA) provides customers with assistance in the use of the public CT (*Portale Offerte*). The role of *Sportello del Consumatore* could be expanded to also provide offline information on available offers and help digitally excluded customers make a choice in the market. In any case, public authorities should be responsible for ensuring that access to information on market offers is inclusive and no additional burden should be placed on suppliers.

Relevant provisions:

Article 14(1)(f): The tools (...) shall be accessible to persons with disabilities, by being perceivable, operable, understandable and robust;

Article 14(1)(par. 2): Member States shall ensure that at least one tool covers the entire market.

[Recast Electricity Directive 2019/944](#)

"Online comparison tools should be implemented in line with the Web Accessibility Guidelines (WCAG) and should ensure that there are no barriers to overcome to access the comparison."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric finds this recommendation sufficient.

Relevant provision:

Article 14(1)(f): The tools (...) shall be accessible to persons with disabilities, by being perceivable, operable, understandable and robust.

[Recast Electricity Directive 2019/944](#)

VIII. Customer Empowerment

"CTs should offer navigation tools such as filtering or alternative ranking functionalities, based on fundamental features of listed products, helping customers to select the best offers for them. The default ranking should be based on price criteria.

CTs should be transparent about the criteria on which navigation tools are based. Where navigation tools are based on subjective parameters (**for example, customer reviews, the CT's own rating or a rating adopted from a third party, a value-for-money assessment, etc.**), CTs should clearly disclose the nature of the parameter and the origin of the underlying data, in order to favour customer awareness."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric finds subjective parameters' inclusion in the CT acceptable, however, we do not feel they should be used in the ranking systems, as they may be manipulated and not provide a fair overview of suppliers' offers. CTs should remain an objective and reliable way to compare products and services and can incorporate these subjective parameters through filtering and navigation tools should customers find the information useful.

"CT providers should consider how best to empower customers to use their service and make appropriate choices for their needs.

Background information on market functioning, on market issues such as price developments, and links to useful independent sources of information may be provided to help the customers."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric finds this recommendation sufficient.

"CT providers should ensure that all the information provided to customers is clearly written and presented. Using consistent or standardised terms and language within and across CTs can help to enable understanding. **When offering information on the source of energy, CTs should enable the consumer to assess this information in an easy way.**"

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric would like clarification on how these offers would be verified. We are concerned about potential greenwashing of future offers if these offers are verified by historical data and values. We would also like to understand why this requirement is only limited to information on the source of energy, and not to the entirety of information provided by the CTs.

Relevant provision:

Article 14 (1d): The tools (...) shall use plain and unambiguous language.

[Recast Electricity Directive 2019/944](#)

"It must be transparent for consumers which personal data are used by the CT to provide its services and which data are shared with third party companies. The access to data should be limited to necessary data that will ensure the smooth operation of the CT. Consumers must have the final choice of sharing their data with CT and/or third parties. The consumer must actively agree to the use and sharing of their personal data. Data protection rules must be taken into account and privacy has to be ensured."

Is this recommendation sufficient? Please share your suggestions and comments.

The issue of data sharing is important, and Eurelectric feels any customer wishing to use a CT by transferring their data should be clearly informed of any use of their data. We agree with the opt-in option proposed and find it is consistent with the customer empowerment process.

Relevant provision:

Article 14 (1h): The tools (...) shall perform comparisons, while limiting the personal data requested to that strictly necessary for the comparison.

[Recast Electricity Directive 2019/944](#)

IX. Dynamic market developments

"CTs should be open to innovation in order to adapt to and reflect the evolution of the energy market: implementation of smart metering, electric vehicles, new pricing models and new business models (demand response, prosumer, aggregators...); thereby helping consumers to become active players in the energy market. **If the CT has the ability to compare new business models, such as aggregation or bundled offers that are part of the energy retail market, it should offer the same quality of comparison as for supply services. CTs must easily provide a means of distinguishing between energy and non-energy elements (and explain what these mean in the context of the offer).**"

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric agrees with this recommendation, because comparing only the price of energy is currently of little significance given that the offers are increasingly consider other services and products that are difficult to compare because they are not standardized. Customer demand has also changed, and, in many cases, the price is no longer the only or the main element that guides the choice. We therefore believe that CTs must be aligned with this evolution, giving more value to the other elements surrounding the commodity.

However, we caution incorporating too much detail in the regulation requirements now for fear of it inhibiting innovative market development. We feel that CTs should be able to incorporate such offers in time, and clearly indicate both the energy and non-energy elements and highlight when an offer is not an "energy-only" offer, but without trying to impose a forced comparison of something that is not comparable since it is not standardized.

"CTs should adapt to the development and deployment of smart meters, being able to process data from them and provide customers with more accurate comparisons and analysis depending on their consumption habits and, in general, on the circumstances that may affect the results of the comparison. **The use of smart meter data should be limited to the individual comparison and data protection in line with the existing legal requirements, which must be ensured by the CT.**"

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric is against this recommendation. We believe it is up to the customer whether they want to share smart meter data with third parties. CTs should not have an obligation to work with smart meter data (directly obtained from smart meter infrastructure). We can only support the final sentence, as it leaves consent of data sharing with the customer.

"As dynamic electricity price contracts must be included in CTs, the level of quality of the comparison should be at least the same as for conventional offers. Moreover, the level of information about dynamic electricity price contracts needs to be higher, given that the consumer may not have experience with the pros and cons of these offers (a consumer search of dynamic price contracts on a CT should, as a minimum, ensure that the CT meets all other CT recommendations which apply to a conventional offer, as well as any additional level of quality for a dynamic electricity price contract search).

CTs could complement suppliers' information about these types of contracts, as it is difficult to compare between dynamic offers and other standard offers. In this regard, before showing the results, CTs should ask whether the consumer would like to compare a dynamic price offer or a standard offer."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric feels that this should be a general information requirement for the CT in alignment with the other recommendations on CTs providing information on how they work and what information is included and used in their tool. The CT should not mix past prices if they are based on spot market or future offers, since these offers are not comparable. When providing a variety of contract options, each type of contract should be clearly explained in a way an average consumer could understand the terms. One way to achieve this clear distinction between products would be to require separate sections of the comparison tool for different offers (e.g. fixed price vs. dynamic price).

Relevant provisions:

Article 14(1): Member States shall ensure that at least household customers, and microenterprises with an expected yearly consumption of below 100 000 kWh, have access, free of charge, to at least one tool comparing the offers of suppliers, including offers for dynamic electricity price contracts.

Article 11(2): Member States shall ensure that final customers are fully informed by the suppliers of the opportunities, costs and risks of such dynamic electricity price contracts, and shall ensure

that suppliers are required to provide information to the final customers accordingly, including with regard to the need to have an adequate electricity meter installed.

[Recast Electricity Directive 2019/944](#)

"In addition to providing a fair and reliable comparison, CTs should inform consumers about different energy efficiency, social care and other public (energy-related) schemes that are being promoted by public bodies/authorities, to the extent possible."

Is this recommendation sufficient? Please share your suggestions and comments.

Eurelectric is against this recommendation for commercial CTs, we feel it should be at their discretion whether to offer additional information beyond the comparison of energy offers. In the case of public CTs, this is likely to be covered by national regulation.

General additional comments

Please add any relevant comments that are not on a specific GGP here.

We would like clarification on whether CEER sees CTs as a vehicle for managing prosumers, and if so, how?

We think it would raise the quality of these recommendations if CEER made a distinction between commercial CT's, performing in a competitive market and making commercial deals with energy suppliers about their services, and a publicly (NRA, etc.) run CT which can combine other information roles on energy consumption related topics.

In EDF's view, the most important recommendation remains that a comparison tool will only be effective and used if trusted by consumers. This means that it must provide objective and transparent information (including their owners and the natural or legal person operating and controlling the tools, as well as information on how the tools are financed), avoiding any misleading feature and providing as complete as possible information in a clear and efficient manner. It therefore appears that to fulfil all these, CTs should be run by public authorities or be regularly controlled, properly sanctioned whenever not compliant with the rules in order to end uncompliant practices.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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