GUIDELINES OF GOOD REGULATORY PRACTICES ON CONSUMER PROTECTION RULES AND COMMUNICATION STRATEGIES

Empowering Mediterranean regulators for a common energy future

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Consumer Working Group (CUS WG)

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ABSTRACT

Consumer protection is a cornerstone of regulatory oversight, with regulators playing a pivotal role in ensuring fairness and justice for consumers. This report emphasises the vital role of regulators in ensuring consumer protection within the energy market. It provides benchmarking on various relevant topics, highlighting the need for transparent communication between regulators, energy stakeholders and consumers, as well as collaborative efforts with various organisations and ministries. Outreach campaigns are essential for empowering consumers and fostering active participation.

The report focuses on 'Billing Elements' to showcase best billing practices and highlights the diversity in legal definitions of bills across countries. Regulators play a crucial role in overseeing billing accuracy and dispute resolution.

Consumer rights encompass aspects like supplier terms, contract termination and access to price comparison tools, which vary among countries. The report stresses the importance of these tools for informed decision-making.

In a dynamic energy market, the examples demonstrating best practices in various countries within the Mediterranean Region offer a valuable framework for regulators and stakeholders to navigate the complexities of consumer protection, promoting fairness and transparency.

Regulators play a crucial role as more than just enforcers of rules; they act as diligent advocates for consumers, working carefully to ensure their protection, empowerment and satisfaction.

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DISCLAIMER

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ABOUT MEDREG

'MEDREG is the association of Mediterranean energy regulators, bringing together 28 regulators from 23 countries spanning the European Union (EU), the Balkans and the MENA region.

MEDREG serves as a platform for facilitating information exchange and supporting its members, fostering capacity development through webinars, training sessions and workshops. Mediterranean regulators collaborate to enhance the harmonisation of regional energy markets and legislation, striving for progressive market integration in the Euro-Mediterranean Basin.

Through continuous cooperation and information exchange, MEDREG aims to promote consumer rights, energy efficiency, infrastructure investment and development by utilising safe, secure, cost-effective and environmentally sustainable energy systems.

The MEDREG Secretariat is in Milan, Italy.

For more information, visit www.medreg-regulators.org

TABLE OF CONTENTS

INTRODUCTION 7

1.1. Background Information 8

1.2. Objective 8

1.3. Structure and Methodology 8

1.4. Limitations 10

CONSUMER PROTECTION AND COMMUNICATION TOOLS AND STRATEGIES 11

2.1. Consumer Protection 12

2.1.1. Role of the Regulator 12

2.1.2. Collaboration with other stakeholders 15

2.1.2.1. Collaboration with National Consumer Rights Authorities 16

2.1.2.2. Collaboration with National Consumer Rights Authorities and Ministries 17

2.1.2.3. Collaboration with National Consumer Right Authorities and Other Stakeholders 17

2.2. Outreach and Awareness 18

2.2.1. Communication with Consumers 18

2.2.1.1. Between Regulator and Consumer 18

2.2.1.2. Between Supplier and Consumer 21

2.2.2. Awareness Campaigns 22

BILLING ELEMENTS 26

3.1. Metering Basics 27

3.2. The Bill 33

3.2.1. Rules on the Content of the Bill 33

3.2.2. Monitoring of Compliance of Rules 36

3.2.3. Information Provided by the Bill 38

3.2.3.1. Identification data 39

3.2.3.2. Energy and Prices Data 42

3.2.4. Information Provided (Metering Data) 48

3.2.5. Receipt and Payment 52

3.3. Billing Disagreements 54
3.3.1. Consumer Complaints Regarding Bill 54
3.3.3.1. Multi-Channel Complaint Submission 55
3.3.2. Role of the Regulator in Dispute Settlements 59
3.3.3. Increasing Bill Understanding 61
3.4. Consumer Rights 62
3.4.1. Supplier Terms and Conditions and Nature of Consumer Contracts 62
3.4.2. Consumers Switching/Ending Contracts with Suppliers 64
3.4.3. Price Comparison Tools 70
CONCLUSIONS **72**

LIST OF FIGURES

Figure 1 - Countries Assessed in the Report 9

Figure 2 - Regulatory Collaboration with Stakeholders to Protect Consumers 15

Figure 3 - Distribution of Regulator/Consumer Communication 19

Figure 4 - Awareness Campaigns Focus per Country 23

Figure 5 - Mechanism for Consumer Complaints 54

LIST OF TABLES

Table 1 - Frequency of Meter Measurement per Country 30

Table 2 - Frequency of Bill Issuing per Country 31

Table 3 - Institution/Body Responsible for Setting the Contents of Bill 33

Table 4 - Institution/Body Responsible for Monitoring the Compliance of Bills 36

Table 5 - Billing Identification Data (North Shore - East) 39

Table 6 - Billing Identification Data (North Shore - West) 40

Table 7 - Billing Identification Data (South Shore) 41

Table 8 - Billing Energy and Pricing Data (North Shore - East) 42

Table 9 - Billing Energy and Pricing Data (North Shore - West) 44

Table 10 - Billing Energy and Pricing Data (South Shore) 46

1
INTRODUCTION

1.1. Background Information

Since the establishment of MEDREG, the consumer has been at the centre of all discussions. A dedicated Consumer Working Group (CUS WG) has been actively involved in developing activities and reports, with a particular focus on promoting consumer empowerment and emphasising the crucial role consumers play in the energy market. In line with this commitment, in 2014, the MEDREG Consumer Issues Task Force issued a report on Good Practice Guidelines for Energy Consumers' Information and Education. This report aimed to establish principles and recommendations for promoting consumer education and information as key elements for consumer empowerment and fostering more active involvement in the energy market. Recognising the significance of consumer protection, the CUS WG has decided to enhance the scope of work covered in this report. The group now aims to provide benchmarking for billing practices, analyse communication tools and rules in place to serve this purpose, and highlight fair and transparent practices conducive to consumer protection that have been applied in recent years.

1.2. Objective

Ensuring consumer protection in the energy sector is a key responsibility of energy regulators. Robust consumer protection rules and effective communication strategies play a crucial role in fostering transparency, promoting fair practices, and safeguarding the interests of energy consumers. This report serves as a comprehensive guide for energy regulators, providing guidelines on best practices to uphold consumer protection standards and optimise communication strategies within the energy industry.

The objective of this report is to equip energy regulators with the necessary tools and insights to promote consumer protection through various methods of communication, using billing elements as an example. Bills provide a practical illustration of the relationship between a consumer and their supplier, demonstrating how consumers can file complaints, how disputes are settled, and, if necessary, how a consumer may terminate their contracts with the supplier.

By exploring the principles, tools and techniques that strengthen and fortify consumers' rights, regulators and other energy market stakeholders can enhance their relationships with these consumers. This fosters a culture of trust, ultimately empowering consumers and enabling them to play a more active role within their respective national energy markets.

1.3. Structure and Methodology

The report begins by highlighting the importance of protecting the end consumer and assisting them in understanding their rights. It emphasises that the energy market would be more efficient with active consumers.

The report will then investigate the various communication tools and strategies that regulators and stakeholders can employ to effectively engage with their consumers. Communication serves as a bridge between energy companies and consumers, enabling the dissemination of important information, clarifying product or service features and addressing consumer concerns, hence emphasising its vitality.

INTRODUCTION

Understanding the diverse communication channels available and the strategies that maximise their potential can empower businesses to establish strong connections with their target audience.

The report will also address billing, a crucial element in the consumer's relationship with the energy market. It serves as a clear example of routine interaction between the supplier and end consumers. Clear and transparent billing practices ensure that consumers comprehensively understand the cost breakdown associated with their consumption and other service charges, reducing the potential for confusion and disputes. The report will also examine key components of billing statements, such as itemised charges, payment terms and dispute resolution mechanisms. It aims to provide energy market players with guidelines for fair and correct billing practices.

The report is derived from the responses of MEDREG members to a questionnaire prepared by the CUS Working Group chairs in collaboration with the MEDREG Secretariat.

The benchmarking template, which communicated with the WG members and chairs, comprised two parts as outlined below:

1. Consumer Protection and Communication
2. Billing Elements

Moreover, the report integrates case studies and best practices from countries that have effectively and successfully addressed similar challenges in the past.

The MEDREG Secretariat collected the data and information from its members and collaboratively drafted the report with the CUS WG chairs.

Figure 1 - Countries Assessed in the Report (Map made using mapchart.net)

MEDREG members from Albania, Algeria, BIH Cyprus, Egypt, France, Greece, Israel, Italy, Jordan, Lebanon, Malta, Montenegro, Palestine, Portugal, Slovenia, Spain and Türkiye provided their responses and have been considered in this report.

1.4. Limitations

While this report strives to provide comprehensive guidelines, it is essential to acknowledge the specific regulatory frameworks and unique market dynamics of various energy sectors and jurisdictions. Energy regulators must consider local regulations, industry practices and regional consumer preferences to tailor their approaches accordingly.

Additionally, the energy landscape is subject to constant evolution, with emerging technologies, policy changes and market trends shaping the industry. Regulators should remain vigilant, continuously monitor developments and adapt consumer protection rules and communication strategies to effectively address emerging challenges.

2

CONSUMER PROTECTION AND COMMUNICATION TOOLS AND STRATEGIES

The ongoing evolution of energy markets necessitates active consumer involvement, as they play a pivotal role in fostering competition, ensuring affordable energy prices and securing a stable supply. In this process, end consumers must be well-informed about their rights and available options, as only under such conditions can they make informed decisions and positively impact the energy market. Simultaneously, they need protection against unfair practices. Recognising these aspects of the energy market, regulators must assume a leading role in informing and safeguarding end customers as necessary. This chapter aligns with these principles and offers practical examples of effective communication strategies within the energy sector. It addresses topics such as responsible marketing practices, handling consumer complaints and leveraging digital technologies to enhance communication and transparency, all from the regulators' perspective. The chapter underscores the significance of clear and accessible communication in cultivating consumer trust, thereby empowering them to actively participate in the energy market, even in the presence of an energy crisis.

2.1. Consumer Protection

2.1.1. Role of the Regulator

Regulatory bodies play a pivotal role in shaping the energy landscape and ensuring consumer protection within the complex realm of electricity and gas markets. These regulatory entities are entrusted with the critical task of safeguarding the interests of consumers, promoting fair competition and upholding the quality and accessibility of energy supply. Through a combination of legal frameworks, mandates and proactive measures, these regulators work diligently to establish an environment where consumers are treated fairly, prices are transparent and services are of the highest quality.

In both **Albania** and **Algeria**, regulatory bodies are entrusted with preserving consumer interests and safeguarding their rights within the electricity sector. The Albanian Energy Regulatory (ERE) and the Electricity and Gas Regulatory Commission (CREG) in Algeria play pivotal roles in ensuring the security and quality of the energy supply while promoting equal treatment and fair pricing. These regulatory bodies operate under specific laws: Law No. 43/2015 'On Power Sector' in Albania and Law No. 02-01 in Algeria. Both ERE and CREG are responsible for a range of tasks, including determining tariffs for end consumers, addressing complaints and appeals from operators and customers, as well as disseminating essential information for consumer protection. Through these efforts, both countries aim to create an environment that upholds consumer rights, guarantees quality service and ensures fair practices within the electricity sector.

Meanwhile, in **Bosnia and Herzegovina (BIH),** the State Electricity Regulatory Commission (SERC) operates as an independent institution with a steadfast commitment to fair practices, consumer protection and competition within the electricity sector. Governed by the Law on Transmission of Electric Power, Regulator and System Operator of BIH, SERC's mandate encompasses various aspects of the electricity market. Its jurisdiction extends to the transmission of electricity, system operation and international trade, and even extends to the generation, distribution and supply of electricity in the Brčko District of BIH. Guided by principles of objectivity, transparency and non-discrimination, SERC ensures consumer protection through

fair and non-discriminatory treatment, high-quality service and proactive measures to prevent anti-competitive activities. This approach contributes to the creation of an efficient and equitable energy landscape that prioritises the interests of consumers.

Across **Cyprus**, **Greece** and **Spain**, regulatory bodies take centre stage in the national energy sector, focusing on safeguarding consumer interests, promoting transparency and ensuring market fairness. The Cyprus Energy Regulatory Authority (CERA), the Regulatory Authority for Energy (RAEWW) in Greece and the National Commission of Markets and Competition (CNMC) in Spain share the common goal of establishing consumer-oriented practices within the electricity sector. Governed by laws such as the Laws Regulating the Electricity Market of 2021-2023 in Cyprus, Article 24 of Law 4001/2011 and Article 138 of Law 4951/2022 in Greece and Law 3/2013 in Spain, these bodies work tirelessly to secure consumer rights. They oversee tasks like determining tariffs, maintaining transparency in contractual terms and facilitating effective dispute-resolution mechanisms[1]. These regulatory efforts serve to foster a market that prioritises consumers, promotes fair competition and ensures access to quality services at equitable prices.

In **Egypt's** electricity sector, the regulator EgyptERA's mission encompasses the entire range of electricity activities, from production to consumption. By ensuring the availability, efficiency and quality of electricity, the agency not only safeguards consumer interests but also preserves environmental considerations and promotes investment. Meanwhile, in the gas sector, the regulatory framework is meticulously designed to protect consumer interests, ensure fair competition and maintain the highest standards of service quality. It also guarantees that gas companies prioritise safety, efficiency and environmental responsibility. Additionally, it actively encourages innovation and investment in the sector, driving advancements that benefit both consumers and the industry. The regulatory body responsible for overseeing the gas industry is the Egyptian Gas Regulatory Authority (GasReg), which operates with a comprehensive mandate to ensure the well-being of consumers and promote a competitive and transparent gas market.

In **France**, consumer interests permeate the activities of the French Energy Regulatory Commission (CRE). CRE's mandate is to establish and monitor dynamic, innovative electricity and gas markets that are consumer-oriented and conducive to the energy transition. CRE ensures that the benefits of regulatory mechanisms are effectively passed on to consumers.

Israel's regulatory framework defines certain populations that must not be disconnected, such as Holocaust survivors. In the regulations established by PUA, an organised procedure is outlined, which is mandatory for contacting the consumer to collect debts.

The regulatory landscapes in **Italy** and **Portugal** are characterised by independent authorities dedicated to promoting competition, ensuring efficiency in public utility services and safeguarding the interests of users and consumers. The Regulatory Authority for Energy, Networks and Environment (ARERA) in Italy and the Energy Services Regulatory Entity (ERSE) in Portugal play pivotal roles in shaping the energy sector. Guided

[1] In Spain, CNMC handles conflicts related to access and claims for changing suppliers.

by their founding laws and statutes, these regulatory bodies take multifaceted approaches to consumer protection. They define service quality standards, ensure transparent service conditions, provide various forms of information to educate consumers, monitor complaints and offer avenues for out-of-court dispute resolution. By setting tariffs, promoting awareness among consumers and evaluating service quality, both ARERA and ERSE contribute to an environment that prioritises consumer rights and fairness, while also fostering competition and efficiency.

In both **Jordan** and **Lebanon**, regulatory bodies navigate the complexities of energy governance with the shared goal of determining electricity tariffs, ensuring efficient energy supply and promoting competitive structures. The energy regulator in Jordan and the Ministry of Energy and Water in Lebanon play crucial roles in the energy sector. Despite differing regulatory landscapes in Lebanon, both countries emphasise consumer protection, efficient supply and fair pricing. These regulatory entities work towards aligning regulations with consumer interests, enhancing energy market efficiency and striving for a balance between energy security and market competition.

Across **Malta**, **Montenegro** and **Slovenia**, regulatory bodies bear the responsibility of safeguarding consumer interests, ensuring fair pricing and offering avenues for dispute resolution within the energy sector. The regulators in Malta, Montenegro and Slovenia contribute to an energy landscape that prioritises consumer rights and equitable practices. They work diligently to ensure consumer access to networks, monitor service quality and establish mechanisms for consumers to address grievances. Through setting network charges, defining quality standards and enforcing consumer protection measures, these regulatory bodies foster transparency and fairness in energy markets, ultimately contributing to a robust and consumer-centric energy sector.

In **Morocco**, the National Electricity Regulatory Authority (ANRE**)** plays a pivotal role in safeguarding the interests and protection of electricity consumers. This commitment stems from the fundamental objectives set by Law 48.15, which established ANRE and the regulatory framework for the electricity sector in Morocco. By defining and monitoring quality standards for electricity supply, regulating tariffs for transportation and distribution and promoting a competitive market environment.

Within **Palestine**, the regulatory body places a strong emphasis on comprehensive consumer protection measures, including dispute resolution, complaints handling, awareness campaigns and the enforcement of consumer rights. Although specific laws are not explicitly outlined in the original piece, the regulatory entity directs its efforts toward fostering transparency and fairness within the energy sector. By addressing consumer concerns, educating the public and offering avenues for dispute resolution, this regulatory body plays a crucial role in establishing an energy environment that prioritises consumer interests.

In **Türkiye**, the Energy Market Regulatory Authority (EMRA), operating under the framework of Law No. 4646, also known as the 'Natural Gas Market Law,' plays a crucial role in the natural gas sector. It safeguards the interests of consumers and ensures the protection of their rights regarding the supply of natural gas energy to all customers. One of its primary responsibilities is to determine tariffs for end consumers, aiming to establish fair and transparent pricing structures. Moreover, EMRA serves as the authority for handling complaints and appeals from a broad spectrum of stakeholders, including operators, network users and

customers, thus fostering a robust mechanism for dispute resolution. Moreover, EMRA is entrusted with the critical task of monitoring and evaluating public service obligations, holding the authority to propose general and specific standards related to the quality of gas supply, customer service and control measures. This function is instrumental in upholding the highest standards of service quality and reliability. Furthermore, EMRA is responsible for formulating and implementing rules, regulations and methodologies in accordance with relevant legal provisions, ensuring the seamless operation and regulation of the natural gas market. In summary, EMRA's multifaceted role encompasses protecting consumer interests, ensuring supply continuity, maintaining quality and promoting equitable treatment in the natural gas sector.

2.1.2. Collaboration with other stakeholders

Across the countries in the Mediterranean, the interaction between regulatory entities and stakeholders highlights a commitment to safeguard consumer interests within the energy sector. These collaborations manifest in diverse ways across nations but share a common objective: fortifying g consumer protection while fostering a competitive and transparent market. From Albania to Spain, two types of collaborations ensure the preservation of consumer needs and the resolution of their concerns. The first type focuses on the implementation of specific mandatory missions, while the second one corresponds to setting up initiatives and the provision of supplementary, voluntary expertise. This approach entails working with various stakeholders depending on the country, influenced by the distinct distribution of competencies, power structures and local needs.

Figure 2 below illustrates the primary stakeholders with whom each regulator interacts the most, including ministries, consumer protection associations and other pertinent entities:

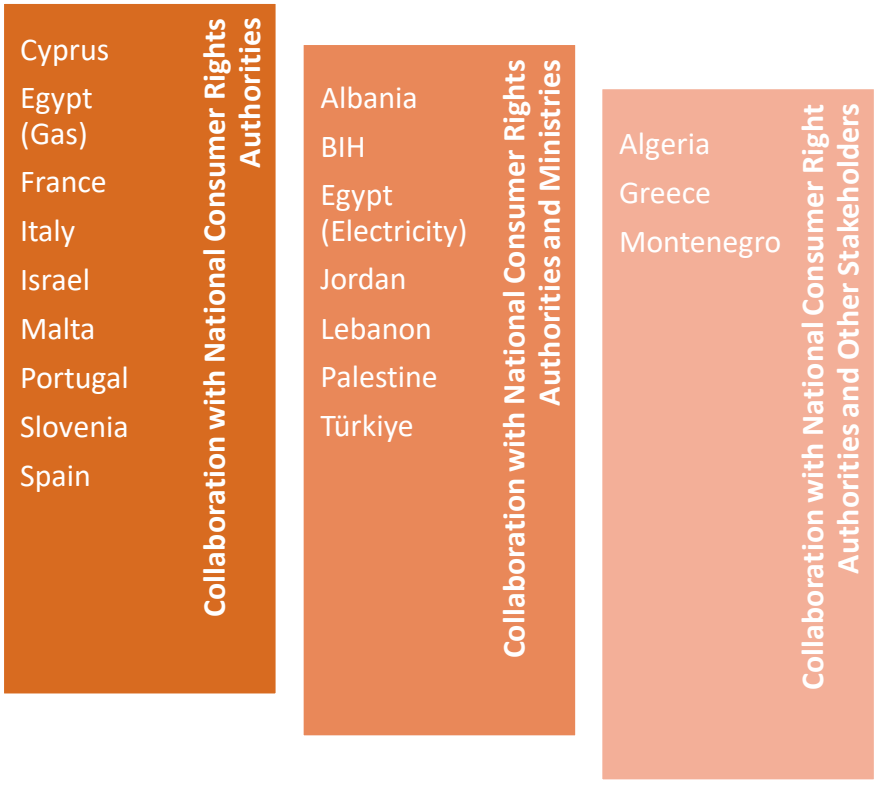

Figure 2 - Regulatory Collaboration with Stakeholders to Protect Consumers

2.1.2.1. Collaboration with National Consumer Rights Authorities

This group comprises countries where energy regulators closely collaborate with national institutions, including competition and consumer rights authorities. These collaborations are designed to guarantee the effective regulation and supervision of the energy sector, promoting competition, safeguarding consumer rights and ensuring compliance with regulatory standards. The energy regulators within this group coordinate with key agencies to establish a balanced and competitive energy market environment while also safeguarding the interests of consumers and market participants.

In **Cyprus**, CERA closely collaborates with the Commission for the Protection of Competition (CPC) of the Republic of Cyprus. Additionally, it may engage in cooperation with the Cyprus Securities and Exchange Commission and the Central Bank of Cyprus. CERA also fosters collaboration with other alternative dispute resolution bodies, aiming to establish straightforward, equitable, transparent, independent, effective and efficient out-of-court dispute resolution mechanisms.

In the **Egyptian** gas market, the GasReg collaborates and unites efforts in a shared commitment to the well-being and protection of gas consumers. The commitment to competition in the gas market is so strong that the CEO of the Competition Authority is a member of the Board of Directors of GasReg.

In **France**, the French Energy Regulatory Commission cooperates with the National Energy Ombudsman (MNE), the ministerial administration in charge of Competition, Consumer Affairs and Fraud Control (DGCCRF) and the Competition Authority. They also consider the input of consumer associations in public consultations and hearings.

In **Italy**, ARERA cooperates with the National Competition Authority for the implementation and enforcement of the legislation on unfair commercial practices in the regulated sectors. They also dialogue and cooperate regularly with consumer organisations. ARERA has an advisory role to the Parliament and the Government to which it can submit reports and proposals.

In **Israel**, consumer organisations apply to the authority periodically to examine regulations. Additionally, the dominant supplier raises issues from the field for the purpose of regulatory examination.

In **Malta**, the energy regulator (REWS) coordinates with the Office of the Ombudsman and MCCAA (the Malta Consumer Affairs and Competition Authority).

In **Portugal**, the energy regulator, ERSE, establishes protocols with consumer dispute arbitration centres, consumer organisations, schools, security forces and other customer associations, including industrial and farmers' associations.

In **Slovenia**, the regulator also seeks help from other national consumer protection organisations.

In **Spain***, the CNMC ensures the uniform application of sectoral and general competition regulations throughout the territory through coordination with the competent bodies of the Autonomous Communities. The CNMC also cooperates with the General State Administration and the courts. They maintain regular and periodic collaboration with the institutions and bodies of the European Union, the European Commission and the competent authorities and bodies of other Member States.

*The regulator in Spain CNMC also acts as the Competition Authority

2.1.2.2. Collaboration with National Consumer Rights Authorities and Ministries

In this group, countries feature energy regulators that engage in coordinated efforts with their respective National Consumer Rights Authorities and ministries. Energy ministries and ministries of relevant sectors play a pivotal role in shaping and implementing energy policies and regulations. They work in tandem with energy regulators to align regulatory practices with national energy strategies, ensuring a stable and secure energy supply. This group signifies countries where there is harmonious collaboration between the regulator, government and Competition Authorities to tackle the topic at hand.

In **Albania**, the regulator works closely with the Energy Ministry, regional and national consumer protection associations and the Competition Authority.

In **BIH**, SERC harmonises its key regulatory activities and exchanges information with the Ministry of Foreign Trade and Economic Relations of BIH, the entity energy regulatory commissions in BIH and other regulatory bodies established at the national level, primarily the Competition Council of BIH.

In **Egypt**, the electricity regulator collaborates with other organisations and institutions to ensure consumer protection, including the Consumer Protection Agency and the Agency for the Protection of Competition and Prevention of Monopolistic Practices. Additionally, they have established a protocol to exchange experiences in the field of consumer protection with the agency for regulating the drinking water utility.

In **Jordan**, the energy regulator, EMRC, collaborates with the Ministry of Energy and Mineral Resources and the Jordan Standards & Metrology Organisation.

In **Lebanon**, LCEC, the Ministry of Energy and Water and the Electricity Distribution Company (EDL) always coordinate their efforts to ensure consumer protection. They work together in setting strategies, formulating policies and spreading awareness among consumers to promote good energy habits.

In **Palestine**, the energy regulator may need to collaborate with various stakeholders, including the Palestinian Society for Consumer Protection, the Palestinian Central Bureau of Statistics and related ministries such as the Ministry of Economy.

In **Türkiye**, like in other countries within this group, the regulator collaborates with the Energy Ministry and the Commerce Ministry. Additionally, the regulator works in conjunction with the Public Auditor institution and regional and national consumer protection associations, as well as other relevant authorities, such as the Competition Authority.

2.1.2.3. Collaboration with National Consumer Right Authorities and Other Stakeholders

This group comprises countries where energy regulators collaborate with National Consumer Rights Authorities and key stakeholders, including Distribution System Operators (DSOs) and Transmission System Operators (TSOs). The collaboration aims to promote market competition and efficiency while safeguarding consumer interests. Other stakeholders may also include the government.

In **Algeria**, the energy regulator collaborates closely with the Energy Ministry, Finance Ministry and Trade Ministry. They also work in conjunction with regional and national consumer protection associations, as well as the Hydrocarbons Regulatory Authority (ARH). Furthermore, the regulator engages with Transmission Operators and Distribution Operators, all with a shared commitment to serving the consumer's interests.

In **Greece**, the energy regulator collaborates with other organisations to ensure consumer protection. They work with Transmission System Operators, Distribution System Operators, consumer organisations, as well as the Greek Ombudsman and other relevant entities to enforce customer protection measures and address consumer complaints.

In **Montenegro**, the energy regulator (REGAGEN) coordinates with DSO, TSO, Ministry of Capital Investments, Energy Community, Chamber of Commerce of Montenegro and Centre for Consumer Protection (CEZAP).

2.2. Outreach and Awareness

In the pursuit of promoting consumer awareness, this subchapter illustrates that effective outreach utilises various communication channels, whether between the regulator and the consumer or the supplier and the consumer. Awareness campaigns for the public fortify the consumers' role in the energy market. By focusing on various initiatives to raise consumer awareness, regulators aim to educate and engage energy consumers, fostering a culture of sustainable energy consumption and empowering individuals to make informed decisions.

2.2.1. Communication with Consumers

2.2.1.1. Between Regulator and Consumer

Energy regulators in different countries in the region use a variety of channels to communicate with end consumers. These channels include websites for all regulators, except for two. Most members have stated that they maintain websites providing information on energy regulations, consumer rights and other topics of interest to end consumers. Furthermore, regulators are increasingly utilising social media platforms such as Facebook, Twitter and LinkedIn to share information with end consumers. Other common means for regulators to communicate with end consumers include press releases, where regulators often issue statements to announce new regulations or other important developments. Additionally, regulators employ newsletters, meetings, workshops and seminars as effective communication tools.

The specific channels that a regulator uses will vary depending on the country and the regulator's specific goals. However, the channels listed above are some of the most common ways that regulators communicate with end consumers. Figure 3 below provides more details regarding the distribution of the forms of communication between regulators and consumers.

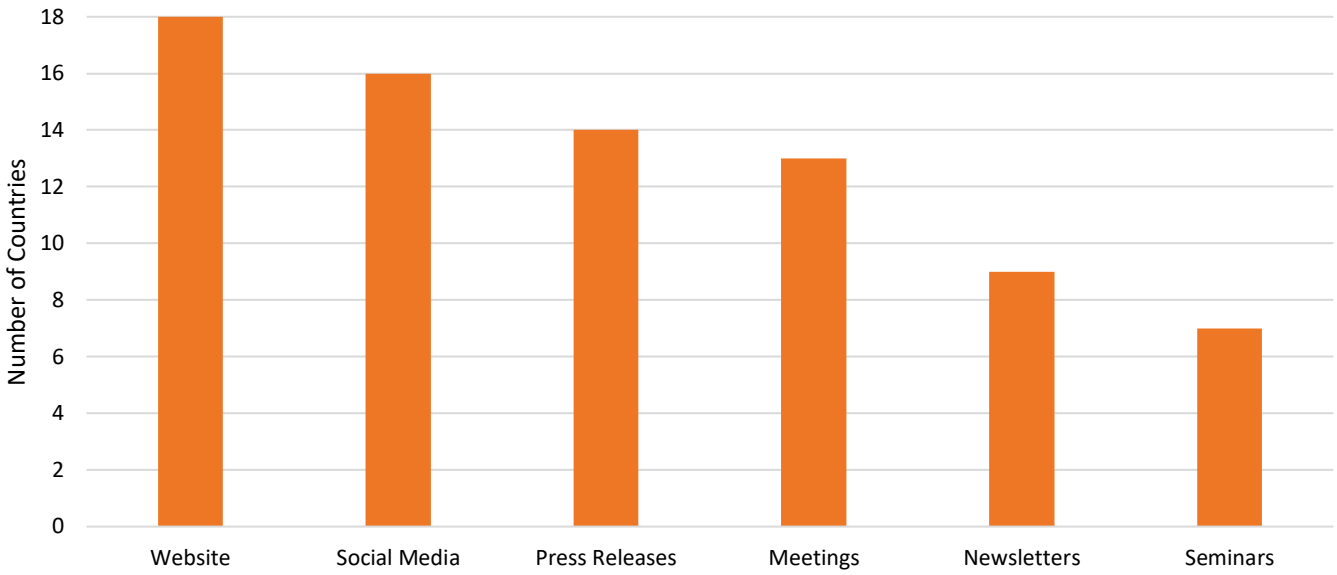

Figure 3 - Distribution of Regulator/Consumer Communication

More details on how each energy regulator/member in the Mediterranean Region manages the issue of communicating with the end consumer can be seen below:

In **Albania**, ERE utilises its website, social media and press releases to communicate with end consumers. ERE also conducts meetings with consumer protection associations and organises regional meetings involving licensees and consumer protection representatives.

In **Algeria**, CREG utilises its website, social media and press releases to communicate with end consumers. CREG also holds meetings with representatives of national consumer protection associations and organises regional meetings with consumer protection, sometimes in the presence of the distributor.

In **BIH**, SERC employs its website, press releases, and, on a needs basis, press conferences to communicate with end consumers.

In **Cyprus**, the CERA provides updates through its website and by press releases, if necessary.

In the **Egyptian** electricity sector, EgyptERA publishes all regulations, Board of Directors' decisions, or announcements on its official website and Facebook page. Meanwhile, GasReg in Egypt uses its website, social media, press releases, public consultations, workshops, seminars and other informational events to communicate with end consumers.

In **France**, the Energy Regulatory Commission (CRE) utilises its website to provide information for end consumers. Additionally, CRE leverages social media and traditional media channels to highlight specific messages. Individuals can also receive information directly by subscribing to ad hoc press releases and monthly newsletters.

In **Greece**, the regulator communicates with end consumers through its website, social media and a call centre. RAEWW has developed various tools and platforms to protect and educate energy consumers,

including a price comparison tool, a consumer complaint platform and a microsite on the electricity consumption of devices.

Quick Look

Greece Case Study

In **Greece**, RAEWW utilises popular social media platforms such as LinkedIn and its website to inform consumers about energy topics. Additionally, it has created several tools and platforms to protect and educate energy consumers:

- Price Comparison Tool: RAEWW has developed a platform where consumers can compare electricity and gas products offered by suppliers.
- Consumer Complain Platform: RAEWW has established a platform where consumers can submit complaints about energy bills. RAEWW monitors these complaints and intervenes with user-friendly solutions.
- Microsite on Electricity Consumption of Devices: RAEWW has developed a microsite (www.electricitycostcalculator.gr) that offers a user-friendly calculator. Consumers can input their device usage times and their supplier's prices to calculate their energy bills.
- Online Application for Energy-Saving: RAEWW provides an online application supporting consumers on energy-saving issues in their buildings. This platform informs consumers in a simple and reliable way about how they can 'modernise' their building or home through a package of energy interventions, aiming to save energy and reduce relative investment costs.
- 5-Day/Week Call Centre: RAEWW operates a call centre five days a week, providing consumers with daily information on energy issues.

In **Israel**, PUA utilises its website, social media and a weekly newsletter to communicate with end consumers.

In **Italy**, ARERA employs its website, social media, press releases and meetings with consumer organisations to communicate with end consumers. Additionally, ARERA can define short 'messages from the Regulator' that must be published by all energy suppliers in their bills.

In **Jordan**, the Energy and Mineral Resources Regulatory Commission (EMRC) utilises its website, social media, audio-visual channels, meetings with partners, awareness campaigns and offices in different governorates to communicate with end consumers.

In **Lebanon**, the Ministry of Energy and Water regularly publishes energy tariffs (fuel prices, electricity prices from private generators, new EDL tariffs). LCEC uses all its social media platforms to provide updates to end consumers.

In **Malta**, REWS uses its website to communicate with end consumers.

In **Montenegro**, the regulator uses its website as well as news and web media to communicate with end consumers.

In **Palestine**, the regulator employs various communication channels, including its website, social media, formal emails, SMS, magazines and radio channels, to reach and engage with end consumers.

In **Portugal**, ERSE utilises multiple communication tools such as its website, a newsletter, videos and podcasts, radio campaigns and various brochures to connect with end consumers.

In **Slovenia,** the regulator provides consumers with access to information on its website through a single point of contact for their rights.

In **Spain**, the CNMC uses its website, social media, blog and podcast to communicate with end consumers. The CNMC also holds meetings with consumer groups and other stakeholders.

In **Türkiye**, the regulator uses websites and their energy guide list. Furthermore, EMRA holds regional meetings with consumer protection agencies in the presence of licensees.

2.2.1.2. Between Supplier and Consumer

Effective communication between energy market stakeholders and end consumers is also of paramount importance, ensuring that consumers are well-informed about the electricity services they receive. Across the Mediterranean region, countries employ diverse strategies and channels to distribute essential information to their consumers. These range from updates on pricing and contract terms to information on environmental impacts and consumer rights. Various approaches, such as official websites, social media, traditional media and regulatory requirements, are employed to foster transparency, consumer empowerment and accountability within the electricity industry. This exploration highlights the multitude of methods utilised to achieve these goals across the region.

The provision of information to consumers regarding electricity services varies across different countries. Suppliers in **Albania**, **Algeria**, **Egypt**, **Israel**, **Italy**, **Jordan and Türkiye** employ various channels such as official websites, social media platforms and audio-visual channels to disseminate updates and important information. In **BIH**, compliance with regulations mandates distribution system operators and suppliers to inform customers through websites, newspapers, brochures and invoices. Suppliers in **Cyprus**, on the other hand, emphasise transparency, ensuring that consumer rights and pricing information are clearly disclosed on bills and websites.

France and **Greece's** suppliers adapt their communication tools to suit customer preferences, employing emails, SMS, phone applications, websites and bill notifications. In **Lebanon**, EDL primarily relies on its website, newsletters and TV channels for updates. In **Malta**, suppliers utilise SMS, websites and social media to keep consumers informed. **Montenegro's** Energy Law requires suppliers to publish pricing information, consumer rights and environmental impacts on their websites and bills. It also updates consumers on bill payment methods and discount policies through various media channels.

Palestinian suppliers employ a diverse set of channels, including social media, websites, magazines, news platforms, radio channels, notes on receipts and PERC platforms. In contrast, a supplier in **Portugal**

communicates through letters, emails, SMS, phone calls and invoices. Suppliers are obliged to provide, whenever asked by customers, a pre-contractual information template with the main characteristics of the contract. Furthermore, it is mandatory that suppliers inform consumers about contract changes with at least 30 days in advance. This communication must include information about the right to terminate the contract without any penalty if the consumer does not accept the new terms. Suppliers in **Slovenia** mandated to inform consumers about price and contract term changes at least a month in advance, with this information being provided free of charge. In **Spain**, suppliers are obligated to inform consumers of contract changes one month in advance, either in writing or via email. This allows consumers the option to withdraw from the contract free of charge, as outlined in Law 24/2013. This law emphasises transparency and price comparison in the revision process.

Meanwhile, in **Morocco**, suppliers are responsible for communicating with the end consumer solely through their website.

2.2.2. Awareness Campaigns

Energy regulators across various countries recognise the pivotal role of education and awareness campaigns in empowering consumers within the energy market. These campaigns aim to inform consumers about their rights, responsibilities and options, fostering a sense of active participation. Regulators understand that informed consumers are more likely to make decisions that align with their preferences and needs. Additionally, these campaigns sometimes broadcast impartial news and information to assist consumers in making well-informed choices.

Through awareness campaigns, energy regulators underscore the importance of promoting energy efficiency and sustainability. Consumers are made aware of the economic, environmental and personal benefits associated with energy-efficient practices. Campaigns stress long-term cost savings and the reduction of carbon footprints, encouraging consumers to adopt energy-efficient behaviours. Furthermore, consumers are often kept informed about new practices and technologies, and are provided with detailed information regarding transparency, calculation methods and other specifics. Figure 4 below illustrates the focus areas of countries in their awareness campaigns.

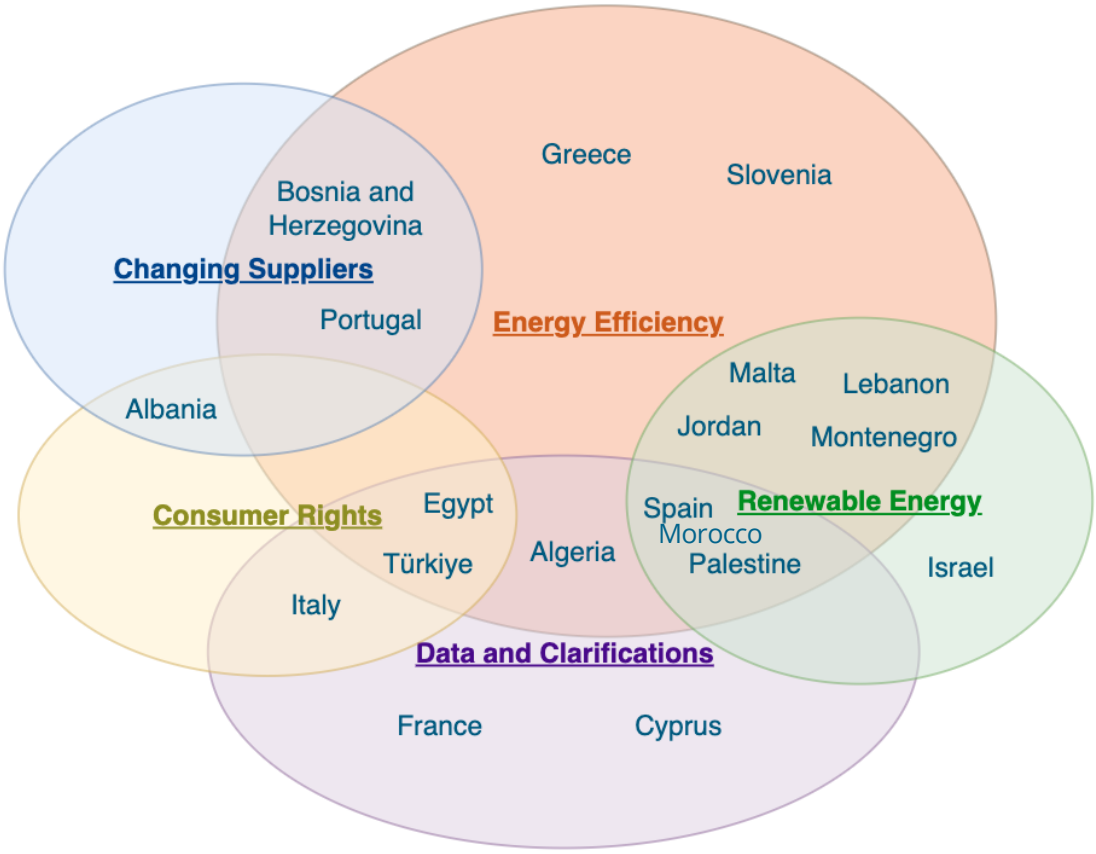

Figure 4 - Awareness Campaigns Focus per Country

Albania's energy awareness campaigns are comprehensive and cover various crucial topics in the energy sector. They empower consumers by providing information about their rights, connection procedures, fees, changing suppliers and understanding electricity bills. These campaigns play a vital role in ensuring well-informed consumers.

In **Algeria,** campaigns prioritise consumer safety and promote energy efficiency. They educate consumers about safety risks related to electricity and gas misuse while encouraging responsible energy consumption practices. As part of the miscellaneous data and clarifications provided by CREG, campaigns to prevent carbon monoxide poisoning are carried out in close collaboration with the ministry responsible for energy.

Energy awareness campaigns in **BIH** aim to educate consumers about switching energy suppliers, provide investment guidelines and promote energy-saving through websites and leaflets.

In **Cyprus,** the regulatory authority is allowed to publish information documents to enhance public awareness of electricity-related issues, ensuring transparency in the energy sector.

In **Egypt,** campaigns within the electricity sector cover a wide range of topics, including energy efficiency, regulations, consumer rights, metering systems, billing and pricing, delivered through various channels. Similar goals exist in the gas sector, with a focus on energy conservation and safety. GasReg addresses topics such as gas consumer rights, safety issues (how to safely use gas appliances, how to act in case of identifying gas leaks) and energy conservation within the gas market.

In **France**, the regulator CRE primarily supports consumers during market transitions by providing data and clarifications but does not conduct extensive consumer awareness campaigns. CRE has been particularly active in the media and with the press for the last year.

In **Greece**, the Regulatory Authority (RAE) collaborates with consumer organisations to promote energy-saving practices through practical advice and tools, such as the 'electricity cost calculator.'

Israel's campaigns focus on transitioning to green energies, aligning with global efforts to promote sustainable and environmentally friendly energy sources.

Italy's campaigns focus on transitioning to green energies, aligning with global efforts to promote sustainable and environmentally friendly energy sources.

Jordan's EMRC conducts awareness campaigns on energy-saving practices, renewable energy adoption, environmental awareness and sustainability, utilising various communication channels.

In Lebanon, campaigns emphasise energy efficiency, renewable energy and installation guidelines, showcased through national TV channels, social media and flyers.

Malta's campaigns primarily focus on energy-saving initiatives and motivating consumers to install renewable energy systems, contributing to a more sustainable energy landscape.

Montenegro promotes energy-saving practices and solar installations through public calls, aiming to enhance efficiency and sustainability.

The Agence Marocaine pour l' Efficacité Energétique (AMEE) in **Morocco** conducts campaigns to promote energy efficiency and renewable energy across various sectors such as transportation, buildings, industry, agriculture and urban planning. AMEE utilises events, online platforms, radio, TV and consulting to inform and engage both the public and professionals, aiming for a sustainable energy future in Morocco.

In Palestine, awareness campaigns cover a wide range of energy-related topics, including energy-saving practices, safety measures, renewable energy, tariffs, complaints systems and connection fees. Various communication methods are employed to disseminate this information.

Portugal's campaigns address topics such as switching energy suppliers, raising awareness about company practices and providing energy-saving tips through multiple communication channels.

In Slovenia, energy suppliers are mandated to regularly inform consumers about consumption patterns and efficient energy usage opportunities. This information is typically included on bills, enhancing consumer awareness.

Spain's dynamic energy market features diverse suppliers employing varying communication strategies, including price reductions, promotion of renewable energy options and more. Communication methods encompass web-based platforms, advertising, telephone, radio, television and tailored approaches.

Quick Look

France Case Study

The French Energy Regulatory Commission (CRE) is legally responsible for supporting consumers in the phasing-out of regulated tariffs. It also strives to identify consumers' additional needs to ensure they can make informed decisions. The energy crisis has prompted CRE to publish indicative reference prices and intensify its guidance for professional consumers.

On July 1, 2023, French-regulated gas supply tariffs were discontinued for all, encompassing households and micro-businesses. In a bid to instil trust in the free market, the CRE publishes indicative price indexes. These monthly benchmarks for gas supply prices serve as an average estimate, reflecting the costs incurred by suppliers in providing natural gas to residential customers.

This initiative draws on the experience of publishing weekly price indexes for small and medium enterprises as well as public buyers of similar sizes during key times. Launched in Autumn 2022, this initiative was renewed for Autumn 2023. The price references published by CRE are intended to assist SMEs and local authorities in the process of signing or renewing a supply contract for 2024. The goal is to ensure that suppliers' offers are competitive and reflect the actual costs of supply. This is achieved through a reference built on a transparent, neutral and non-discriminatory methodology.

In addition, in September 2023, CRE published its guide to best practices for private and public-sector professional consumers. This guide aims to assist them with their gas and electricity purchases by describing the issues to consider before signing or renewing a contract. It emphasises the importance of anticipating and properly analysing energy requirements. The guide also explains how contract prices are set, distinguishes between different types of contracts based on consumers' consumption characteristics and purchasing strategies, and highlights contractual clauses that require particular attention and their impact on consumers' bills. Furthermore, in October 2023, CRE followed up with a specific guide tailored for social landlords.

3
BILLING ELEMENTS

As mentioned previously, billing is taken as an example to showcase how consumers can be protected, guided, and eventually empowered. The intricate process of energy billing serves as a crucial bridge between suppliers and consumers. This chapter explores energy billing, starting from the fundamental principles of metering, where energy usage is meticulously measured, to the detailed breakdown of billing information. The chapter sheds light on how energy costs are calculated and presented to consumers. Additionally, the chapter highlights the topic of billing disputes, offering insights into how regulators resolve confusion between suppliers and customers. Furthermore, the chapter sheds light on consumers' rights, empowering them to make informed decisions when it comes to changing energy suppliers and utilising price comparison tools to optimise their energy expenditures.

3.1. Metering Basics

Meter reading is a fundamental aspect, and ensuring accurate billing represents the summit of the supplier-consumer relationship. However, the methods employed for meter reading vary significantly from one country to another, reflecting a blend of technological advancements, regulatory frameworks and consumer preferences.

In **Albania**, the meter reading process is relatively traditional, involving physical visits by the distributor's agents who are responsible for reading the indices on the meters installed at consumers' locations. While this method is labour-intensive and may not be as efficient as more modern, automated approaches, it ensures accuracy and reliability in capturing consumption data.

Algeria employs a combination of meter reading methods. Distributor agents physically visit the premises of low-voltage consumers or use portable data capture terminals (PDE) to read the indices. However, all medium and high-voltage customers are remotely read. Additionally, consumers have the option to transmit their meter indices online through a dedicated application on the distributor's website, offering convenience and real-time data transmission.

In **BIH**, the DSO organise and conduct meter readings, giving them control over the process. Meter readings can be carried out physically, ensuring data accuracy. Additionally, in some areas, remote readings are implemented, and consumers in remote areas may also participate through self-reading, with the DSO retaining the right to verify the readings. The frequency of meter readings is linked to various factors, including supplier switches, tariff changes and contract terms.

In **Cyprus**, the meter reading process is quite varied. For consumers connected to the Low Voltage Distribution Network, meter readings are conducted through on-site visits by department employees who electronically record the data. This method ensures data accuracy and reliability. However, for consumers connected to the Medium Voltage Distribution Network or low-voltage premises with a load exceeding 100A, remote automated reading is employed, enhancing efficiency and reducing the need for physical visits.

Egypt employs different meter reading methods in its electricity and gas sectors. In the electricity sector, a mixed approach is used, wherein representatives from the company physically visit consumers to check

their meters. In contrast, the gas sector offers more flexibility, permitting physical meter readings by meter readers or self-reporting by consumers through websites or mobile applications. Self-reporting involves consumers taking their meter readings and submitting them digitally, streamlining the billing process and giving consumers more control over their data.

In **France**, smart meters, capable of remotely transmitting data, have become the norm. In principle, traditional meters are still physically read, but consumers have the right to transmit their readings via the internet, phone, or any other means they choose. This flexibility caters to the diverse preferences of consumers.

Meter reading in **Greece** primarily involves physical visits to consumer premises. For standard low-voltage customers, readings are taken every 4 months, with estimated consumption used for a portion of this period. Eventually, company personnel visit to read the meters and calculate the total consumption. This approach strikes a balance between convenience and data accuracy.

Israel's meter reading landscape is diverse, reflecting the transitional phase towards full smart meter deployment. Different types of meters require specific reading methods, including physical, remote, combined and smart meters. The choice of method depends on the meter type, contributing to a varied metering landscape.

In **Italy**, remote reading is adopted for smart meters, providing accurate data without the need for physical visits. However, for traditional meters, physical readings by the DSO are the standard practice. Additionally, consumers have the option to self-report their readings to the supplier, offering flexibility and convenience.

Meter reading in **Jordan** is adaptable, employing both physical and remote methods. Physical readings involve meter readers visiting consumer premises and manually recording index readings. In contrast, many meters are equipped with remote monitoring capabilities, enabling data transmission to the utility company without physical intervention. This can be achieved through various technologies, ensuring data accuracy and reducing the necessity for on-site visits.

In **Lebanon**, the meter reading is organised through Distribution Service Providers (DSPs). Representatives from these DSPs physically visit power meters to collect data, which is then reported to the electricity distribution company (EDL) for billing. This approach ensures that accurate consumption data is captured and used for billing purposes.

Malta employs various meter reading methods to accommodate diverse consumer situations. Smart meters facilitate remote reading, ensuring both data accuracy and convenience. In cases of traditional meters, the DSO conducts manual readings and customers also have the option to submit readings electronically. Billing based on actual consumption is mandated by law, with bimonthly billing being the common practice.

Meter reading in **Montenegro** varies based on whether consumers have smart meters. For those with smart meters, index readings are collected remotely, enhancing efficiency and data accuracy. Traditional meters still require physical readings, ensuring accuracy and reliability.

In **Morocco**, the remotely conducted project is currently in the early stages of its implementation phase, with pilot projects and trials having been launched. However, there is still a physical component involved in the process.

The meter reading approach in **Palestine** depends on the type of meters consumers have on their properties. Various meters, including post-paid meters, pre-paid meters, smart meters and remote-control meters, employ different reading methods. Some meters are read physically, requiring monthly field visits, while others are read remotely or through prepaid methods.

In **Portugal**, meter readings are primarily conducted physically for both electricity and gas meters in most cases. However, regulatory authorities have defined strict standards for the frequency of local index readings, ensuring timely and accurate billing for consumers. In the electricity sector, there is a mandatory requirement that by the end of 2024, all meters must be replaced with smart meters. This transition will enable remote and even more accurate metering information, enhancing the efficiency of the billing process.

Slovenia's approach to meter reading differs between electricity and natural gas. Electricity metering devices record consumption data for most users, with the option for remote data transmission. Users without smart meters are read annually and some consumers can provide monthly consumption data through self-reading. For natural gas, daily metering is required for high-usage points, while physical meter reading is conducted annually when remote readings are unavailable.

In **Spain**, meter readings are predominantly conducted remotely.

Meanwhile, in **Türkiye**, index readings are done physically by the distributor's agents during their visits for reading collection. However, for smart meters, the readings are taken remotely.

Quick Look

Spanish Case Study

In **Spain**, smart meters communicate data through powerline communication (PLC) to a device known as a Tertiary Concentrator, which serves as an intermediary. These concentrators not only facilitate data transmission but also monitor energy flows for fraud detection. Communication between the concentrators and the distributor is secured through VPN networks, enabling various functions such as power adjustments, billing and network management.

In the case of an individual, smart meters communicate via PLC to a device owned by the distributor known as a Tertiary Concentrator. This device is typically located in buildings referred to as Transformer Centres.

The Tertiary Concentrators, in addition to serving as intermediaries between the meters and the Distributor, can also include supervision functions. This involves conducting measurements of the energy

circulating through the transformer to detect fraudulent uses of the electric fluid. They monitor at all times to ensure there are no deviations between the aggregate power of all the meters and that measured at the output of the transformer. The Concentrators communicate with the Distributor via IP through several channels (radio, fibre, 3G, etc.), often with a second level of protection based on VPN networks. The Distributor can communicate back with the concentrators, requesting changes to the contracted power of a particular meter, adjustments to billing periods, connection and disconnection of the electrical network, or even the implementation of firmware updates.

It is worth mentioning that for non-smart meters, different countries have varying periods during which consumption is measured. The details can be seen in Table 1 below:

Table 1 - Frequency of Meter Measurement per Country

	Monthly	Bi-monthly	Quarterly	Yearly	Other
Albania	X		X*		
Algeria	X		X		
BIH	X				
Cyprus		X			
Egypt	X				
France				X	X
Greece			X		
Israel	X	X			
Italy					X
Jordan	X				
Lebanon		X			
Malta		X			
Montenegro	X				

	Monthly	Bi-monthly	Quarterly	Yearly	Other
Morocco	X				
Palestine	X				
Portugal		X	X		
Slovenia				X	
Spain		X			
Türkiye	X		X		

It is noteworthy to mention that in **Albania**, exceptionally, the longest period during which the reader is allowed not to generate measurement data, either due to the lack of access to the measurement data or the inability to read the generated data, is 3 months. During this time, the invoice is issued monthly, referring to the data generated in the same month of the previous year. At the end of this period and upon reading the correct data generated by the meter, the corrected invoice is issued.

Quick Look

Italy Case Study

In **Italy**, more than 99% of electricity meters are smart meters. However, for natural gas, the reading frequency of a traditional meter depends on the average yearly consumption of the customer, as follows:

- At least 1 reading per year for consumption up to 500 Smc/year.
- At least 2 readings per year for consumption up to 1.500 Smc/year.
- At least 3 readings per year for consumption up to 5.000 Smc/year.
- Monthly reading for higher yearly consumption.

Once the meter readings are taken and the calculations are made, the bill is issued and sent to the final consumers by the supplier. However, different countries in the Mediterranean region have different frequencies at which the bill is given to the consumer; details of which can be seen in Figure 2 below:

Table 2 - Frequency of Bill Issuing per Country

	Monthly	Bi-monthly	Quarterly	Yearly	Other
Albania	X		X		

BILLING ELEMENTS

	Monthly	Bi-monthly	Quarterly	Yearly	Other
Algeria	X		X		
BIH	X				
Cyprus	X	X			
Egypt	X				
France				X	X
Greece	X				X
Israel	X	X			
Italy					X
Jordan	X				
Lebanon		X			
Malta		X			
Montenegro	X				
Morocco	X				
Palestine	X				
Portugal	X	X			
Slovenia	X				
Spain	X				
Türkiye	X		X		X

It is important to mention that in both **Albania**, a bill is sent once a month; however, every three months, the bill is sent based on the exact consumption rather than the estimated consumption. Meanwhile, in **Algeria** and **Türkiye**, industrial consumers are billed monthly, while household consumers are billed every 3 months. In Türkiye, more than 12 bills are sent out to the consumer in some exceptional cases.

One may also notice that in France, the bill is provided to the consumer once a year. This is due to legal requirements stipulating that the term 'bill' should specifically refer to the actual consumption rather than an estimated one. By law, the supplier must produce an actual consumption bill at least once every year. Throughout the year, the consumer is requested to make monthly or bi-monthly payments based on contractual obligations. Requirements may vary depending on the type of consumer.

Regarding contractual obligations and the frequency of billing, in **Greece**, there might be a slight difference where bills are sent bi-monthly instead of monthly.

Meanwhile, in **Italy**, the billing frequency is defined in the supply contract; customers have the right to receive a bill based on actual consumption at least once a year. Electricity and natural gas supply contracts in the free market usually establish a monthly or bi-monthly billing frequency. With reference to regulated supply service, billing frequency is bi-monthly for electricity and depending on the average yearly consumption, in coherence with the meter reading frequency.

3.2. The Bill

3.2.1. Rules on the Content of the Bill

In this subchapter, the regulatory landscape governing the contents and formats of electricity bills across various countries is explored from the perspective of the bodies or entities responsible for the content of the bill. Understanding the guidelines and processes for crafting these essential documents is crucial for ensuring transparency, accuracy and clarity in billing practices. Each country in the Mediterranean region outlined has its own set of laws, directives and regulatory bodies tasked with defining the requirements for electricity bills. A summary of the institutions that developed the rules governing the contents of the bills can be seen in Table 3 below.

Table 3 - Institution/Body Responsible for Setting the Contents of the Bill

	NRA	Ministry	Other
Albania	X	X	
Algeria			X
BIH	X		X
Cyprus	X		
Egypt (Electricity)			X
Egypt (Gas)	X		

	NRA	Ministry	Other
France		X	
Greece	X	X	
Israel (Electricity)	X	X	
Israel (Gas)		X	X
Italy	X		
Jordan	X	X	
Lebanon			X
Malta	X	X	
Montenegro	X		
Morocco		X	
Palestine	X		
Portugal	X	X	
Slovenia	X	X	
Spain		X	
Türkiye	X	X	

Details of every country can be seen below:

In **Albania**, the regulator sets out the minimum requirements for electricity bills as per the electricity law, while the Ministry of Finance handles approving the format of these bills.

In **Cyprus**, CERA decides on the requirements for bill content and pricing information to ensure clarity, accuracy and user-friendliness for final consumers. The laws regulating the electricity market and Supply Rules govern the content and format of bills.

In **Egypt's** Gas Sector, GasReg collaborates with gas suppliers to create clear and comprehensive gas bills. Although no specific steps are outlined due to GasReg's recent establishment in 2018, discussions and criteria agreement precede bill implementation.

Meanwhile, the European Union legislation and **French** law establish principles and requirements for household consumer invoices. Detailed rules for invoicing and payment terms are provided in the arrêté du 18 avril 2012[2]. The National Energy Ombudsman (MNE) may issue general recommendations in dispute resolution.

In Greece, **RAEWW** consults the public and stakeholders before publishing decisions on bill contents and formats. These decisions can take months to finalise, as evidenced in RAE's Decision 389/2022.

In **Israel**, the regulatory authority defines accounting standards related to billing, including content, payment methods and delivery. The Ministry of Energy determines consumer groups eligible for electricity discounts. In the Israeli gas sector, the suppliers also have a say regarding what can be included in the bills.

In Italy, **ARERA** sets minimum information requirements for energy bills, while suppliers have flexibility in defining the bill format. Compliance with regulator-defined information elements is mandatory.

In **Jordan**, the electricity bill format is determined by EMRC and distribution companies. The Energy and Minerals Regulatory Commission (EMRC) works on guidelines to enhance bill clarity for consumers.

Bill reviewing in **Malta** is an ongoing process conducted by the Ministry and the NRA.

The content of electricity bills in **Montenegro** is defined by the general conditions for electricity supply and the Agency is mandated to adopt these conditions.

In **Morocco,** the distribution market is a combination of public and private entities. For private distribution, the Ministry of Interior plays a role in setting rules or requirements for distribution companies through cahiers de charges (specifications or contracts). These cahiers de charges can provide more specific guidelines for the distribution companies' operations, including billing practices. For the public sector, represented by ONEE distribution, since its overseeing ministry is the Ministry of Energy, the cahier de charges is published by law.

In **Palestine**, the Energy Regulatory Commission (PERC) monitors bill formats provided by Distribution Companies (DisCos) and offers recommendations for improvements based on consumer feedback and field visits.

In **Portugal**, rules for bill content and format can be established through decree-law or ERSE's regulation instruments, with legislative acts in place to elaborate and publish these rules.

[2] Arrêté du 18 avril 2012 *relatif aux factures de fourniture d'électricité ou de gaz naturel à leurs modalités de paiement et aux conditions de report ou de remboursement des trop-perçus*

In **Slovenia**, under VAT law, taxable persons must invoice supplies in accordance with the Value Added Tax Act. The Act on Electricity Supply ensures that electricity bill information is correct, clear and user-friendly, with the agency supplying additional clarifications on its website.

In **Spain**, the Ministry handles establishing the contents of electricity bills. This process involves consultation with relevant stakeholders and is formalised through resolutions, such as the one from April 28, 2021, specifying the minimum content and model of electricity bills for regulated supply.

In **Türkiye**, EMRA determines the minimum requirements and bill format that the natural gas bill must meet based on the provisions of the natural gas market law. The Ministry of Energy applies discounts in some special cases such as earthquakes. EMRA has approved the 'Communique on the principles regarding the determination and invoicing of the sales amount of natural gas for invoicing,' which includes provisions for the supplier to inform the customers of their respective invoices.

Others

In **Algeria**, there is no specific entity responsible for bill content and format for household consumers. Suggestions for bill improvements can come from various sources, including the operator, Commission, or consumer protection associations. The regulatory basis is outlined in executive decree N°05-468.

In **BIH**, the regulatory commissions in the two Entities of BIH define the rules for the content and format of electricity bills for end consumers. In the Brčko District of BIH, these conditions are approved by SERC.

Meanwhile, in **Lebanon**, the national electric utility, EDL, handles determining the format of electricity bills.

3.2.2. Monitoring of Compliance of Rules

Following the finalisation of the bill format and its contents, an institution is usually tasked with monitoring compliance with the pre-set rules. It is this entity's role to ensure that the supplier is providing the requested information in the most effective way possible. A detailed diagram below shows which institution monitors said compliance.

In most Mediterranean countries, the body responsible tends to be the regulator. Seldom times, the entity responsible is the government. More details can be seen in Table 4 below:

Table 4 - Institution/Body Responsible for Monitoring the Compliance of Bills

	NRA	Ministry	Other
Albania	**X**	**X**	
Algeria			**X**
BIH			**X**
Cyprus	**X**		

BILLING ELEMENTS

	NRA	Ministry	Other
Egypt (Electricity)	X		
Egypt (Gas)	X		
France		X	
Greece	X		
Israel	X		
Italy	X		
Jordan	X	X	
Lebanon			X
Malta	X		
Montenegro	X	X	
Morocco		X	
Palestine	X		
Portugal	X		
Slovenia	X		
Spain		X	
Türkiye	X		

In **Albania**, the Ministry of Finance oversees the compliance of bills with the general rules, and the Consumer Protection Agency ensures adherence to consumer protection laws.

In **Egypt**, the Electricity Holding Company and EgyptERA monitor Distribution Companies (DisCos) according to the Electricity Distribution code requirements. Meanwhile, in the gas sector, GASREG enforces rules for gas bill content and format. The monitoring is done through audits, investigations, complaints, self-assessments and reports submitted by gas suppliers.

In **France**, the content of electricity and gas bills is regulated by consumption laws and is enforced by the Ministry for Economy's Competition, Consumer Affairs, and Fraud Control services (DGCCRF).

The **Greek** regulator (RAE) routinely checks supplier bills for infringements of the Energy Act or the Supply code. They also introduced the 'Positive Report' initiative to recognise compliant suppliers.

In **Israel**, the authority sets standards for the entire billing procedure, and the same applies to the gas sector, where NGA is responsible.

ARERA in **Italy** checks suppliers' compliance with billing transparency regulations and can impose sanctions for non-compliance.

EMRC in **Jordan** handles monitoring the compliance of billing rules and ensures distribution companies adhere to prescribed guidelines and regulations.

In **Malta**, there is an ongoing monitoring process conducted by the national regulator REWS, but no specific process is outlined.

In **Montenegro**, the regulator monitors whether suppliers correctly display network usage charges, while the Ministry responsible for energy oversees the implementation of the Energy law.

In **Palestine,** PERC monitors bill formats from DisCos, makes recommendations, and may receive bills from consumers or collect samples during field visits.

ERSE in **Portugal** monitors bill content compliance through complaints and can initiate audits and inspection actions.

The regulatory agency (AGEN) in **Slovenia** monitors the implementation of internal market provisions for electricity and natural gas, with the authority to impose fines for infringements.

Supervision in **Spain** is conducted by the Ministry and Regional Energy Services. Consumers and Consumer Organisations can directly report non-compliance.

Other

In **Algeria**, the regulatory basis for invoices is defined by executive decree n°05-468, with specific details about energy bills outlined in executive decree 05-182. The CREG plays a role in tariff decisions.

In **BIH**, in the two Entities of BIH, the relevant entity regulatory commissions have passed General Conditions for Electricity Supply, which include the rules related to the contents and format of bills for end consumers. In the Brčko District of BIH, these conditions are developed by the regulated company and approved by SERC.

Lastly, the EDL in **Lebanon** handles the bill's format, issuance and content to ensure all necessary sections are included.

3.2.3. Information Provided by the Bill

3.2.3.1. Identification data

Bills tend to include identification data that distinguishes one consumer from the other. In that regard, the questionnaire assessed the presence of the following data on the bill:

- Supplier's details
- Customer's name
- Billing address
- Supply address
- Number of metering points and type of meters
- Date of issue
- Date of due payment
- Billing period
- Method of payment

Details regarding the inclusion of identification data in each country can be found in the tables below. Note that the countries are grouped by geographical position, with the north shore divided between east and west, while the MENA region is treated separately.

3.2.3.1.1. North Shore (East)

Table 5 - Billing Identification Data (North Shore - East)

	Albania		BIH		Cyprus		Greece		Montenegro		Türkiye	
	ELE	GAS	ELE		ELE		ELE	GAS	ELE		ELE	GAS
Supplier's details	X	X	X		X		X	X	X			X
Customer's name	X	X	X		X		X	X	X			X
Billing address (address of the person to whom the bill is addressed)	X	X	X		X		X	X	X			X
Supply address (address of the point of delivery)	X	X	X		X		X	X	X			X
Reference number - Number of metering points	X	X	X		X		X	X	X			X
Reference number - Type of meters							X	X	X			X

BILLING ELEMENTS

	Albania		BIH		Cyprus		Greece		Montenegro		Türkiye	
	ELE	GAS	ELE		ELE		ELE	GAS	ELE		ELE	GAS
Reference number - Other			X									X
Date of issue	X	X	X		X		X	X	X			X
Date of due payment	X	X	X		X		X	X	X			X
Billing period	X	X	X		X		X	X	X			X
Method of payment	X	X	X		X							X

3.2.3.1.2. North Shore (West)

Table 6 - Billing Identification Data (North Shore - West)

	France		Italy		Malta		Portugal		Spain		Slovenia	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE	GAS	ELE	GAS
Supplier's details	X	X	X	X	X		X	X	X	X	X	X
Customer's name	X	X	X	X	X		X	X	X	X	X	X
Billing address (address of the person to whom the bill is addressed)	X	X	X	X	X		X	X	X	X	X	X
Supply address (address of the point of delivery)	X	X	X	X	X		X	X	X	X	X	X
Reference number - Number of metering points	X	X	X	X	X		X	X	X	X	X	X
Reference number - Type of meters	X	X	X	X	X				X	X		X
Reference number - Other	X	X			X						X	
Date of issue	X	X	X	X	X		X	X	X	X	X	X
Date of due payment	X	X	X	X	X		X	X	X	X	X	X

BILLING ELEMENTS

	France		Italy		Malta		Portugal		Spain		Slovenia	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE	GAS	ELE	GAS
Billing period	X	X	X	X	X		X	X	X	X	X	X
Method of payment	X	X	X	X	X		X	X	X	X		

3.2.3.1.3. South Shore (MENA)

Table 7 - Billing Identification Data (South Shore)

	Algeria		Egypt		Israel		Jordan		Lebanon		Morocco		Palestine	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE		ELE		ELE	
Supplier's details			X	X	X		X	X	X		X		X	
Customer's name			X	X	X		X	X	X		X		X	
Billing address (address of the person to whom the bill is addressed)			X	X	X		X	X	X		X		X	
Supply address (address of the point of delivery)				X	X		X	X					X	
Reference number - Number of metering points			X	X	X		X	X	X		X		X	
Reference number - Type of meters			X				X	X	X		X		X	
Reference number - Other													X	
Date of issue			X	X	X		X	X	X		X		X	
Date of due payment			X		X		X	X			X		X	
Billing period			X	X	X		X	X	X		X		X	

	Algeria		Egypt		Israel		Jordan		Lebanon		Morocco		Palestine	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE		ELE		ELE	
Method of payment					X		X	X					X	

3.2.3.2. Energy and Prices Data

In addition to the identification data, the bill must include energy and price data. A sample of the data analysed per country is as follows:

- Synthetic information - Capacity charge, energy charge, fixed charge, capacity charge and others
- Total consumption
- Payable amount - Excluding and including VAT.
- Payable amount - Benefits and subsidies
- Breakdown of payable amount - Network charge, supply service, energy, levies, taxes and others
- Outstanding/previous debts

Details of such data per country can be seen in the tables below. Like previously, the countries are grouped by geographical position, where the north shore is divided between east and west, while the south shore/MENA region is treated separately.

3.2.3.2.1. North Shore (East)

Table 8 - Billing Energy and Pricing Data (North Shore - East)

	Albania		BIH		Cyprus		Greece		Montenegro		Türkiye	
	ELE	GAS	ELE		ELE		ELE	GAS	ELE		ELE	GAS
Synthetic information - Capacity charge (charge depending on the connection capacity)			X				X	X	X		X	X
Synthetic information - Energy Charge (variable charge depending on energy consumed)	X	X	X		X		X	X	X		X	X
Synthetic information - Fixed charge (charge not depending on energy consumed or capacity)	X	X	X		X		X	X	X		X	X

BILLING ELEMENTS

	Albania		BIH		Cyprus		Greece		Montenegro		Türkiye	
	ELE	GAS	ELE		ELE		ELE	GAS	ELE		ELE	GAS
Synthetic information - Energy product specification (is there a special product such as usual fuel mix, green fuel mix, other possible products?)					X		X				X	
Synthetic information - Capacity charge (fixed charge depending on the connection capacity)							X	X			X	X
Synthetic information - Energy charge (variable charge depending on energy consumed in high tariff and in low tariff)	X	X	X				X				X	X
Synthetic information - Energy charge (variable charge depending on energy consumed in a single tariff)			X		X		X	X	X		X	
Synthetic information - Energy charge (fixed charge not depending on energy consumed or capacity)					X		X	X				
Total consumption	X	X	X		X		X	X			X	X
Payable amount - Excluding and including VAT	X	X	X		X		X	X	X		X	X
Payable amount - Benefits and subsidies	X	X			X		X	X	X			
Payable amount – Other	X	X			X*		X	X	X			

BILLING ELEMENTS

	Albania		BIH		Cyprus		Greece		Montenegro		Türkiye	
	ELE	GAS	ELE		ELE		ELE	GAS	ELE		ELE	GAS
Breakdown of payable amount - Network (transmission and distribution) charge			X		X		X	X			X	X
Breakdown of payable amount - Supply service (margin)			X						X			X
Breakdown of payable amount - Energy	X	X	X		X		X	X	X		X	X
Breakdown of payable amount - Levies	X	X	X		X		X	X	X		X	X
Breakdown of payable amount - Taxes and excise duties	X	X	X		X		X	X			X	X
Outstanding/previous debts	X	X	X		X		X	X	X		X	X

3.2.3.2.2. North Shore (West)

Table 9 - Billing Energy and Pricing Data (North Shore - West)

	France		Italy		Malta		Portugal		Spain		Slovenia	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE	GAS	ELE	GAS
Synthetic information - Capacity charge (charge depending on the connection capacity)			X	X	X		X	X	X	X	X	X
Synthetic information - Energy Charge (variable charge depending on energy consumed)	X	X	X	X	X		X	X	X	X	X	X
Synthetic information - Fixed charge (charge not depending on	X	X	X	X	X		X	X	X	X	X	X

BILLING ELEMENTS

	France		Italy		Malta		Portugal		Spain		Slovenia	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE	GAS	ELE	GAS
energy consumed or capacity)												
Synthetic information - Energy product specification (is there a special product such as usual fuel mix, green fuel mix, other possible products?)			X				X	X	X		X	
Synthetic information - Capacity charge (fixed charge depending on the connection capacity)			X	X			X	X	X	X	X	X
Synthetic information - Energy charge (variable charge depending on energy consumed in high tariff and in low tariff)	X	X	X		X		X	X	X		X	X
Synthetic information - Energy charge (variable charge depending on energy consumed in a single tariff)	X	X	X	X	X		X	X	X		X	
Synthetic information - Energy charge (fixed charge not depending on energy consumed or capacity)			X	X			X	X	X	X		
Total consumption	X	X	X	X	X		X	X	X	X	X	X
Payable amount - Excluding and including VAT	X	X	X	X	X		X	X	X	X	X	X
Payable amount - Benefits and subsidies			X	X	X		X	X	X	X		

	France		Italy		Malta		Portugal		Spain		Slovenia	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE	GAS	ELE	GAS
Payable amount – Other	X	X	X	X					X	X		
Breakdown of payable amount - Network (transmission and distribution) charge	X		X	X			X	X	X	X	X	X
Breakdown of payable amount - Supply service (margin)	X	X	X	X					X	X		X
Breakdown of payable amount - Energy			X	X	X		X	X	X	X	X	X
Breakdown of payable amount - Levies	X	X	X	X			X	X	X	X	X	X
Breakdown of payable amount - Taxes and excise duties	X	X	X	X			X	X	X	X	X	X
Outstanding/previous debts			X	X	X		X	X	X	X	X	X

3.2.3.2.3. South Shore (MENA)

Table 10 - Billing Energy and Pricing Data (South Shore)

	Algeria		Egypt		Israel		Jordan		Lebanon		Morocco		Palestine	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE		ELE		ELE	
Synthetic information - Capacity charge (charge depending on the connection capacity)	X	X			X				X				X	
Synthetic information - Energy Charge (variable charge depending on energy consumed)	X	X	X	X	X		X	X	X				X	

BILLING ELEMENTS

	Algeria		Egypt		Israel	Jordan		Lebanon	Morocco	Palestine
	ELE	GAS	ELE	GAS	ELE	ELE	GAS	ELE	ELE	ELE
Synthetic information - Fixed charge (charge not depending on energy consumed or capacity)	X	X		X	X	X		X		X
Synthetic information - Energy product specification (is there a special product such as usual fuel mix, green fuel mix, other possible products?)										X
Synthetic information - Capacity charge (fixed charge depending on the connection capacity)	X	X						X		X
Synthetic information - Energy charge (variable charge depending on energy consumed in high tariff and in low tariff)	X	X	X			X		X		X
Synthetic information - Energy charge (variable charge depending on energy consumed in a single tariff)	X	X								X
Synthetic information - Energy charge (fixed charge not depending on energy consumed or capacity)	X	X				X				X
Total consumption	X	X	X	X	X	X	X	X	X	X

	Algeria		Egypt		Israel		Jordan		Lebanon		Morocco		Palestine	
	ELE	GAS	ELE	GAS	ELE		ELE	GAS	ELE		ELE		ELE	
Payable amount - Excluding and including VAT	X	X		X	X				X		X		X	
Payable amount - Benefits and subsidies	X	X		X	X		X				X		X	
Payable amount – Other	X	X	X											
Breakdown of payable amount - Network (transmission and distribution) charge													X	
Breakdown of payable amount - Supply service (margin)									X				X	
Breakdown of payable amount - Energy	X	X	X	X	X		X		X				X	
Breakdown of payable amount - Levies	X	X							X				X	
Breakdown of payable amount - Taxes and excise duties	X	X		X	X				X		X		X	
Outstanding/previous debts	X	X	X	X	X		X						X	

3.2.4. Information Provided (Metering Data)

Understanding the intricacies of metering data is essential. The applied practices in different countries not only play a crucial role in ensuring correct and transparent billing but also empower consumers to make informed decisions about their energy consumption.

BILLING ELEMENTS

In **Albania**, the information on bills related to metering data is concise and includes the meter number, old index and new index. The energy consumption for both gas and electricity is metered monthly for both household and non-household customers.

In **Algeria**, the billing information comprises the meter number, old index and new index. Gas and electricity consumption is metered quarterly for low voltage/pressure and monthly for medium and high voltage/pressure. The consumption is determined by the difference between the old index and the new index and this value is billed to the consumer. Electricity (Low voltage) customers in Algeria have three tariff choices (progressive, double and triple tariff) based on their needs. On the other hand, gas customers (Low pressure) have only a progressive tariff available to them.

In **BIH,** metering data are provided on electricity bills, encompassing the meter number, old index, new index and a breakdown of energy consumed in high and low tariffs for households. Meters are read monthly, enabling customers to compare current and previous consumption easily.

In **Cyprus**, metering data on household electricity bills include information such as tariff type, meter indication, previous meter indication, total consumption and more. Tariffs in Cyprus are structured based on fuel prices and the bill provides details on fuel adjustment charges.

Quick Look

Cyprus Case Study

There is no gas market in Cyprus. The provided data corresponds to the household electricity bill issued by the dominant supplier, Electricity Authority of Cyprus (EAC). The bill includes the following information related to metering data:

- Type name of tariff.
- Indication of the meter.
- Previous indication of the meter.

(For tariffs with a fixed billing rate for all hours of the day and all seasons, only one meter reading is displayed).

- Total consumption.
- Electricity consumption during the same period of the previous year.
- Graphic illustration of the consumption of electricity for the current period related to the consumption of last year's period.
- Basic fuel price (€/metric ton).
- Current fuel price (€/metric ton).
- Fuel adjustment clause.

The tariffs are structured on a Basic Fuel Price of €300 per Metric Ton (MT). The Current Fuel price is the Weighted Average Fuel Price of the Month (WAFP) per MT for power energy production. The WAFP is calculated every month according to the fuel consumption and cost of fuel:

(Cost of fuel consumption of the month + COSMOS charge + cost of the greenhouse rights)/Quantity of fuel consumed during the month.

The cost of Power Energy production depends on the cost of the fuel used for generation, which is adjusted monthly in the following manner: The charge per kilowatt/hour (kWh) refers to the basic fuel price of €300/MT. For every 1 cent increase or decrease in the basic price of €300/MT of fuel cost, the price per kWh is increased or decreased by the value of the Coefficient of Fuel Adjustment currently in force. The Fuel Adjustment Charge is calculated as follows:

(Current Fuel Price – Basic Fuel Price) x Coefficient of Fuel Adjustment x 100.

In **Egypt**, bills include only the last reading, with previous readings available upon request from the Distribution company. Gas bills in Egypt display the total gas consumption for the current and previous months, enabling customers to track their consumption patterns.

In **France**, the bill must include the consumption period covered and the indices from the start and end of the period. It should also specify whether the level of consumption billed is estimated, actual, or transmitted by the customer. When it is an estimation, the bill must provide additional specific information. In the case of natural gas, the network operator uses a gas conversion coefficient to determine the quantity of energy corresponding to the volume supplied. The bill must also include this gas conversion coefficient. Additionally, for comparative purposes, the bill must provide the consumption history in kWh for the whole year preceding the invoice date.

In **Greece**, metering data on bills includes detailed information such as energy consumption, time of use, capacity, technology and meter type. Some meters allow remote access for consumption data and historical consumption data can be requested.

In **Israel**, bills show the amount of electricity consumed at a domestic tariff, with graphical comparisons to regional consumption averages. This helps consumers understand their consumption patterns compared to others in their area.

In **Italy**, metering information on bills includes the date and reading values, nature of reading (actual, self-reading, or estimated), measured and total consumption and historical consumption for the last 12 months. Electricity bills in Italy also detail consumption based on different time slots. Similarly, like **Cyprus**, Italy provides a high level of detail on electricity bills. Both countries' bills include information on the type of tariff, meter indication, previous meter indication and total consumption, among other details. However, one key difference is that Cyprus provides additional information related to fuel prices and adjustment clauses.

In **Jordan**, metering data on electricity bills is transparent and customer-focused. The billing information includes the current meter reading, previous meter reading, consumption period, unit of measurement

(e.g., kilowatt-hours) and the applicable tariff rate for electricity. Traditional meters require manual reading by meter readers who visit the premises and record the consumption. However, smart meters can measure and transmit consumption data automatically, enhancing accuracy and convenience. Customers in Jordan can compare their actual consumption with historical or previous billed consumption by referring to the meter readings provided on the bills. This enables them to assess their energy usage patterns effectively. Billing practices in Jordan are governed by energy regulations and utility policies to ensure transparency and fairness in the billing process.

In **Lebanon**, bills display total consumption, the difference between current and previous meter readings, and energy consumption per tranche with relative prices.

Malta indicates meter readings at the beginning and end of the billing period and includes bimonthly consumption data from the past year.

Montenegro compares the current month's consumption with the same month from the previous year, considering the variation in the tariff (high and low tariffs).

In **Palestine**, bills include meter reading periods, debts, dates, VAT and more, with post-paid meters read monthly according to tariff laws.

Portugal uses real metering data or estimated readings, with consumer readings considered real metering readings.

In **Slovenia**, electricity bills provide a comprehensive overview of consumption. They display the meter balance at the beginning and end of the billing period, detailing both higher and lower tariff consumption, or a single tariff if applicable. The bill clarifies whether the balance is based on actual measured data or estimated values. Additionally, customers can review their electricity consumption for the past 12 months leading up to the billing month. For natural gas, customers receive detailed invoices specifying the components billed, along with an explanation of how readings are determined (whether estimated or based on actual readings). The bill also includes data for converting volume units into energy units. Customers have multiple means to compare their current gas consumption, including personal records, historical data from the operator over two years, and online access to their customer account with the operator and supplier. Furthermore, customers have physical access to their gas meter readings and can take their readings at any desired interval, providing transparency and control over their energy usage.

In **Spain**, electricity bills feature historical consumption data presented in the form of a bar graph, adhering to specific guidelines. The graph illustrates months on the horizontal axis and kilowatt-hours (kWh) on the vertical axis, adopting a naming format like 'month-XX.' The bill incorporates a minimum of the last 14 months' consumption information, and for new customers, the available consumption period is displayed. Depending on the billing frequency (bimonthly or monthly), either alternative months or consecutive months constitute the period. Each month's consumption is depicted by vertical bars, with different colours signifying various tariff periods, and estimated consumptions are clearly marked with distinct colours. Explanatory legends for the colour scheme are provided, and a horizontal line, determined by the relevant

authority (COR), indicates the average consumption in kWh for the specified period. Specific formatting applies if the consumer is under the Last Resort supplier.

In **Türkiye**, billing information for gas consumption includes the meter number and the old and new index. The measurement of gas consumed is conducted through a monthly reading of the indices for both household and non-household customers.

3.2.5. Receipt and Payment

Once calculations are made, the bill is sent to the customer based on their billing address. Upon analysing how consumers in the Mediterranean region receive their bills and choose their method of payment, one can highlight the following similarities between the countries.

Online Bill Access: Many of the countries mentioned, such as Albania, Algeria, Cyprus, Egypt, France, Greece, Israel, Italy, Jordan, Malta, Montenegro, Palestine, Portugal, Slovenia, Spain and Türkiye, allow consumers to access their bills online through the respective distributor's or supplier's website or application.

Electronic Bill Delivery: In several countries, consumers have the option to receive their bills electronically via email or other online methods. This is mentioned in BIH, Cyprus, Israel, Italy, Montenegro and Portugal.

Flexibility in Payment Methods: Most countries provide consumers with multiple payment methods, including electronic payment, credit/debit card payments and online banking. This flexibility is highlighted in Albania, Algeria, BIH, Cyprus, Egypt, Greece, Israel, Italy, Jordan, Malta, Montenegro, Portugal, Slovenia and Spain.

Consumer Choice: Many countries emphasise that consumers have the freedom to choose their preferred method of bill delivery and payment. This is particularly notable in BIH, France, Israel, Italy, Malta, Montenegro, Portugal, Slovenia and Spain.

Physical Bill Delivery: Some countries, like Egypt, Lebanon and Türkiye, mention physical bill delivery to the consumer's address as part of the process.

Mobile Access: Palestine mentions various methods of bill receipt, including mobile applications, reflecting the increasing use of mobile technology for billing in several countries.

Payment at Service Offices: Several countries mention the option for consumers to pay their bills at customer service offices, adding convenience for those who prefer in-person interactions. This option is mentioned in Egypt, Jordan and Malta.

Regulatory Framework: Some countries, like France and Italy, mention specific regulations or consumer rights related to bill delivery and format, emphasising the importance of consumer choice and protection.

Details per country can be seen below:

In **Albania**, bills are distributed through the distributor's contracted postal service. Consumers have the option to access their bills online via the distributor's website and can choose to settle them physically or electronically, including electronic payment through interbank cards.

BILLING ELEMENTS

In **Algeria**, bills are distributed by the distributor's agents and consumers can also access their bills online through the distributor's website. Payment options include physical or online methods.

In **BIH**, bills are delivered to the customer's specified address in the contract, but electronic delivery via email is an option. Customers can choose from various payment methods, including cash, debit cards, credit cards, mobile payments and electronic bank transfers.

In **Cyprus**, bills can be received either by post or email, and consumers who wish to switch to email delivery can apply online.

In **Egypt**, electricity bills are delivered by representatives from the distribution company and can also be accessed on the company's website or through an online application. Gas bills are typically delivered in person, but consumers can inquire about their bills online.

In **France**, consumers receive bills by postal mail by default, but suppliers may opt for digital invoices for willing consumers if they carry out annual confirmations and implement sufficient communication. Consumers have the right to request paper invoices at any time, free of charge.

In **Greece**, bills can be sent via post or email, depending on the supplier's service availability.

In **Israel**, bills are distributed by the distributor's contracted postal service by default, but consumers can request to receive their bills by email. Online bill consultation and telephone service requests are also available.

In **Italy**, ARERA regulations dictate that customers should receive electronic bills by default but can request paper bills by post. Payment methods can be selected from those offered by the supplier, including bank or credit card direct payment.

In **Jordan**, consumers with non-smart meters receive bills manually on-site, while those with smart meters receive electronic bills via text messages or the distribution company's application. Payment options include customer service offices and electronic methods.

In **Lebanon**, consumers receive physical bills at their billing address from the DSP representative, with a few days allowed before collecting payment in cash.

In **Malta**, bills can be received by post or electronically, and various payment methods are available, including online payment through the supplier's website, customer care offices, direct debit, internet banking, ATMs and post offices.

In **Montenegro**, the bill receipt method is determined by the supply agreement, and the consumers can choose between receiving bills via post or email.

In **Palestine**, the method of bill receipt varies based on meter types and technology, including hand delivery, SMS, email, mailbox, mobile applications and prepaid meters.

In **Portugal**, consumers can choose to receive bills by mail or email, and they have the flexibility to select their preferred payment method within the available options.

In **Slovenia**, bills are typically issued in physical form, but consumers can opt for electronic bills. Different payment options are offered to ensure flexibility in settling bills.

In **Spain**, consumers have the choice of receiving bills via post or email, allowing them to select their preferred method of bill delivery.

In **Türkiye**, the distribution company's meter reading personnel take care of distributing the bills. Consumers have the convenience of checking their bills online via the 'Customer area' on the distributor's website and can then settle their bills either in person or through online methods. The distribution company ensures that the bill reaches the customer's address a minimum of 10 days before the due date.

3.3. Billing Disagreements

Upon receipt and after reviewing the bill, consumers can often misunderstand some of the elements or believe that the provided information is inaccurate. This sub-chapter discusses how a consumer should file complaints related to the bill and the potential role of the regulator in settling any disputes that may arise.

3.3.1. Consumer Complaints Regarding Bills

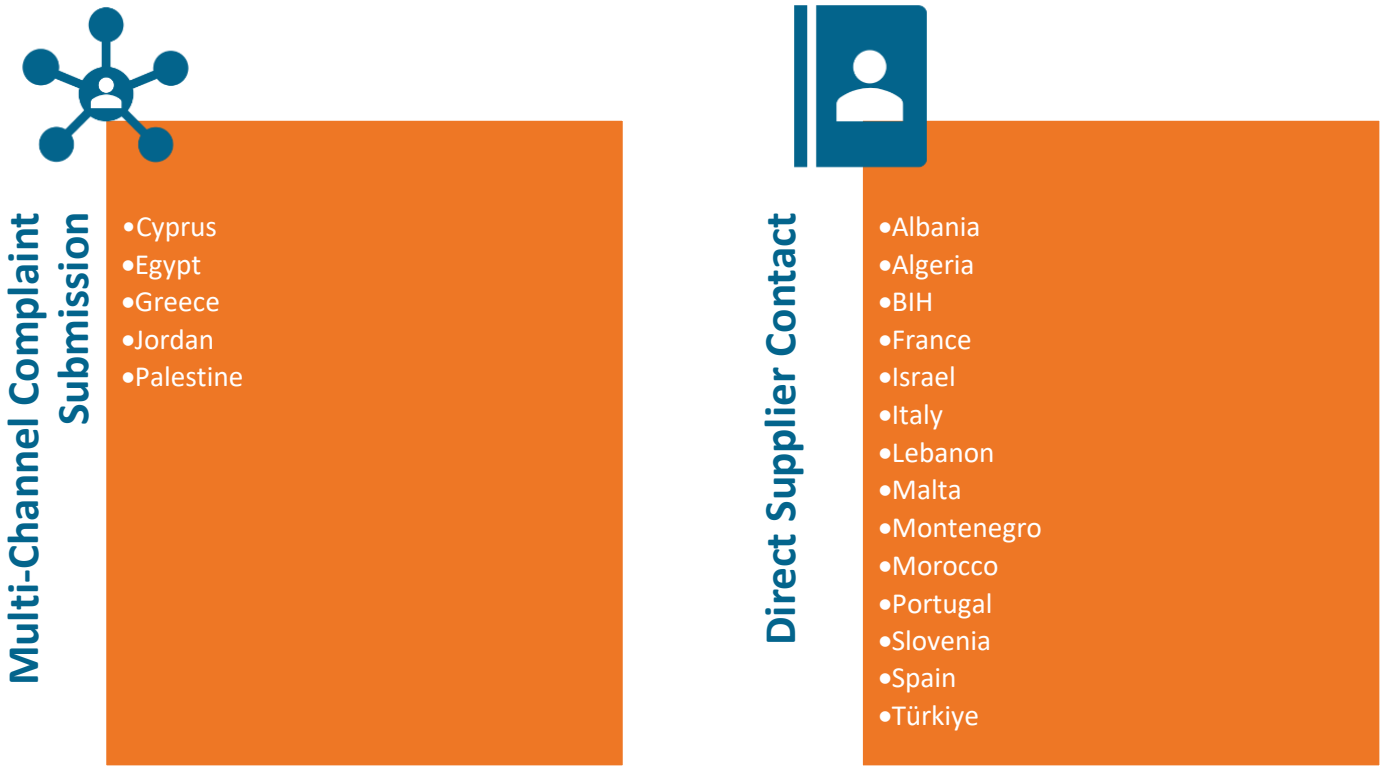

Figure 5 - Mechanism for Consumer Complaints

Regarding complaints and after analysing the replies from the regulatory bodies of the Mediterranean region, one can group the countries based on their similarities as seen in Figure 5 above:

It is noteworthy to mention that these groupings are based on general similarities in their approaches to billing dispute resolution, but each country has its unique aspects and variations in its procedures and regulations. A detailed view of every country's perspective can be seen below based on its classification.

3.3.3.1. Multi-Channel Complaint Submission

This group of countries places importance on providing consumers with multiple channels for submitting complaints, including correspondence, email, telephone and in-person visits.

In **Cyprus**, consumers have the right to raise complaints about their electricity bills. The process involves multiple channels of communication, including corresponding letters, emails (through the regulator's website), telephone and even in-person visits to the regulator. There are distinct procedures for complaint handling and formal dispute settlement proceedings, both of which are governed by Electricity Law No. 87/2015 and its executive regulations. The regulator plays a crucial role in overseeing the entire process, ensuring consumers' concerns are addressed effectively.

In **Egypt**, consumers can raise complaints regarding their electricity bills, and these complaints can be submitted through various means, including letters, email, telephone, or by visiting the regulator in person. The complaint handling process involves several steps, including assigning a complaint number, forwarding the complaint for analysis and informing both the complaining party and the licensed company about the progress. Consumers need to contact the electricity company first, and if the company does not resolve the complaint within a specified timeframe, the regulator may intervene. Similarly, in Egypt's gas sector, consumers can raise complaints about their gas bills by contacting their gas supplier's customer service department. The gas suppliers do not allow consumers to defer payment until the complaint is resolved; it is an obligation to pay the full amount. Depending on the nature of the complaint, the gas supplier either addresses the issue or directs the consumer to the appropriate channel for resolution, ensuring that consumer concerns are addressed effectively.

In **Greece**, consumers can lodge complaints about their bills to various entities, including the Regulatory Authority for Energy (RAE), DSOs, Suppliers, Alternative Dispute Resolution (ADR) bodies and the Ombudsman. Processing times for these complaints vary depending on the organisation involved, with deadlines ranging from 10 working days for suppliers to 90 calendar days for ADR bodies. Unless the complaint is addressed to the supplier, it is generally resolved after the payment deadline, ensuring that consumers' rights are protected.

In **Jordan**, consumers have the right to dispute their electricity bill. If a dispute is found to be valid, the customer is not obligated to make payment, and the distributor will suspend any disconnection of the supply due to the unpaid invoice. This mechanism provides financial relief and protection for consumers while billing disputes are addressed.

In **Palestine**, consumers can lodge complaints about their bills with the Discos, and if the issue remains unresolved, they can escalate it to PERC through various means of communication. This multi-tiered approach provides consumers with options for effectively addressing billing concerns.

Quick Look

Egyptian Case Study

In **Egypt's** electricity sector, consumers have the option to file complaints regarding their electricity bills, with most issues being resolved before bill payment is due. The complaint submission process to the regulator is designed to be accessible and efficient, offering various methods for customers to choose from:

- Corresponding letters.
- Email (utilising the complaint form on the regulator's website).
- Telephone.
- In-person visits (walk-ins) to the regulator's office.

However, it's crucial to note that the procedures differ between complaint handling and formal dispute settlement proceedings, governed by the Electricity Law No. 87/2015 and its executive regulations.

Complaint Handling Procedures:

1. Complaints received are stamped with a unique Regulator entry number for tracking purposes.
2. The complaint is presented to the CEO of the regulator, who then forwards it to consumer protection specialists and related divisions that may require technical or financial analysis.
3. The consumer protection division promptly prepares two letters:
    - The first letter is addressed to the complaining person, providing them with the complaint number and informing them that the Regulator is actively investigating the matter.
    - The second letter is sent to the licensed company, informing them of the results of the study and analysis conducted by the working group.

In the case of phone-in complaints, agency representatives gather key information during the initial contact, including:

- The complainant's name, address, telephone number and any other available contact details.
- The name of the licensed company involved.
- The main points of the complaint.

The complaint then follows a structured flow within the Regulator, ensuring proper addressing. Notably, the Regulator's primary role in dealing with complaints is to ensure that consumers first contact the company directly.

If the company fails to respond and resolve the complaint within ten working days, the consumer protection division initiates further actions. This includes sending three reminders to the company. If the issue remains unresolved, the Regulator takes its decision and communicates it to the company, requiring

compliance. In cases where the company still does not resolve the complaint, the matter may be escalated to the Board of Directors.

It's essential to acknowledge that certain types of complaints may require more extensive study and analysis due to their complexity.

3.3.3.2. Direct Supplier Contact

In these countries, there is a strong focus on consumer protection. They encourage consumers to make direct contact with the companies involved in billing disputes before escalating the issue further. The goal is to ensure consumers' rights are protected, and disputes are resolved efficiently.

In **Albania**, customers have the right to dispute their invoices. If the dispute is found to be valid, they are not obliged to make payment. Importantly, in such cases, the distributor will suspend any disconnection of the supply due to the unpaid invoice. This provides a level of protection to consumers, ensuring they are not unfairly penalised for legitimate billing concerns.

In **Algeria**, consumers have the right to raise disputes regarding their invoices. If a dispute is justified, customers are not required to pay the disputed amount and the distributor will suspend the cut-off of the supply for the unpaid invoice. However, consumers must act promptly by submitting a complaint to the distributor within 15 days of receiving the invoice. Failure to do so may result in the distributor's customer system generating a cut-off order.

Customers in **BIH** can submit a written complaint regarding the amount expressed on the bill to the supplier/DSO, and the time limit for doing so coincides with the payment deadline. Resolution times vary depending on the region within the country, with different entities having their own timelines for addressing complaints. If not satisfied with the result of the complaint, customers living in FBIH and RS may address the entity regulatory bodies, FERK and RERS, respectively. Meanwhile, customers living in BD BIH may initiate dispute resolution before the Basic Court in BD BIH. Consumers should be aware that they are required to pay the uncontested amount of the bill while the complaint is being processed.

In **France**, consumers have the right to dispute their bills by lodging a written complaint with the supplier's customer service department initially. If the complaint remains unresolved after two months or if the response is unsatisfactory, eligible consumers have the option to escalate the matter to the National Energy Ombudsman (MNE) free of charge. Eligible consumers encompass a wide range of individuals and entities, such as individual consumers, micro-businesses and local authorities. While there is no mandatory requirement to postpone the payment deadline during a dispute, each case is considered individually. This system provides a mechanism for consumers to address billing concerns through a formal process. Disputes concerning the fulfilment of supply contracts follow the same process, and alerts may also be sent to the French government's fraud control and consumer affairs services (DGCCRF).

In **Israel**, consumers receiving electricity bills have a specified window of time before the payment deadline to contact the call centre if they have concerns about their bills. During this period, the account will be postponed until the issue is clarified. If a consumer has already paid the bill and errors are later found, they

will receive arrears interest. However, if no errors are found, the consumer must pay the bill, including arrears interest at the time of payment. This highlights the importance of timely communication in addressing billing disputes. The same principles apply to consumers in the gas market, but it's noteworthy that there is no such mechanism for household consumers.

In **Italy**, consumers have the option to submit written requests for information or raise complaints about their bills. Suppliers are required to respond within 30 days, and failure to meet this deadline results in the supplier having to pay an automatic indemnity to the customer in the next bill. If the payable amount on the bill is found to be incorrect, the supplier must credit the customer with the correct amount within 60 days (or 90 days for billing periods of 4 months). This system encourages prompt resolution of billing issues and ensures that customers are compensated for delays in response.

In **Lebanon**, consumers can contact the call centre of EDL for assistance in understanding and resolving complaints about their electricity bills. This personalised approach helps consumers navigate billing concerns with the support of knowledgeable staff.

In **Malta**, consumers can directly raise complaints regarding their bills with the supplier or DSO. This streamlined process allows consumers to address billing issues efficiently and directly with the responsible parties.

In **Montenegro**, consumers have the right to submit complaints about their bills within a specified timeframe. The supplier is obligated to resolve the complaint within a specified period, and the resolution timeframe depends on when the complaint is filed, ensuring that consumers' concerns are addressed promptly.

Meanwhile, consumers in **Morocco** have the option to raise a complaint regarding their bill by contacting the customer service or client service department through various channels, including dedicated complaint lines or green phone lines. However, the timeline for resolving bill-related complaints may vary, and in many cases, utility companies require customers to pay their bills even if they have raised a complaint. If the complaint is later resolved in the customer's favour, they may receive a refund or credit. Consumers can raise generic complaints related to billing errors, service interruptions, or other issues and if not satisfied with the initial resolution, there may be procedures for escalating complaints to higher levels.

Portuguese consumers can raise complaints about their bills directly with the supplier. Any potential supply cut is suspended until the complaint is resolved. Complaints can be initiated through various channels, including phone, email, website, or complaints books (which also have an electronic format), offering flexibility and accessibility for consumers.

In **Slovenia**, consumers can submit complaints about their bills to their suppliers. If the complaint is not resolved or the consumer remains dissatisfied with the resolution, they have the option to request an out-of-court dispute resolution procedure conducted by an independent provider. This process is free of charge for consumers and ensures that billing disputes are addressed impartially.

In **Spain**, the payment period for bills varies, and consumers in the free market can agree with their suppliers on different payment terms. The resolution period for complaints is one month, depending on

the supplier's response time. This flexibility accommodates consumer needs while also providing a reasonable timeframe for addressing complaints.

In **Türkiye**, customers have the right to object to the invoice amount. The objection should be raised with the customer services unit of the distribution company within one year from the date of notification. The distribution company is then obligated to decide on the objection within ten business days from the date it is received. It's important to note that making an objection does not exempt the customer from the payment obligation. If the objection is found to be justified by the distribution company, any amount collected beyond the consumption fee subject to the objection will be refunded to the customer in cash, along with the applied delay interest, within five business days from the date the objection is decided. Alternatively, with the customer's acceptance, the refunded amount may be deducted from their next invoice.

3.3.2. Role of the Regulator in Dispute Settlements

Recognising the importance of addressing consumers' complaints, this chapter delves into the process of dispute resolution as administered by energy regulators across the region. It scrutinises the legal frameworks, mechanisms and responsibilities vested in regulatory bodies, playing a pivotal role in resolving disputes that extend beyond individual consumer complaints.

The **Albanian** regulator, ERE, holds the legal authority, as per the provisions of Article 24 of Law No. 43/2015 'On Power Sector' and Article 98 of Law No. 102/2015 'On Natural Gas Sector,' to address customer complaints, mediate disputes between licensees and resolve issues between licensees and customers or system users seeking access to the grid. It's important to note that complaints related to penal offences or those subject to court proceedings are excluded from this regulatory process.

In **Algeria**, as per the CREG decision (D/29-13/CD of 31 December 2013), the regulator manages consumer appeals, specifically addressing dissatisfaction with how distributors handle complaints. CREG produces annual and semi-annual reports, with plans to establish a conciliation service in 2023–2024.

Meanwhile, in BIH, the three regulatory commissions – SERC, FERK and RERS – as stipulated by relevant laws, possess distinct competencies for dispute resolution. These commissions handle disputes related to electricity supply, tariffs, service delays, quality of supply and more, based on their respective jurisdictions.

In **Cyprus**, CERA is the designated authority responsible for out-of-court dispute resolution and addressing disputes between market participants. CERA ensures that consumers have access to comprehensive information regarding their rights, relevant legislation and available dispute-resolution mechanisms. This information is made electronically available through single points of contact.

In **Egypt**, the regulator, mandated by Article 4 of Electricity Law No. 87/2015, is tasked with reviewing and adjudicating disputes among Electricity Utility Stakeholders. Article 6 outlines the agency's authority to approve decisions addressing such disputes. The Electricity Distribution Code and General Conditions for Distribution Licenses serve as essential regulatory instruments for resolving complaints and disputes in the electricity sector. In the gas market, if gas market participants in Egypt submit complaints to GasReg concerning gas market activities, these complaints undergo review by committees appointed by the GasReg CEO. The committees may engage internal or external experts and consultants in their analysis, which

includes hearing sessions with involved parties, document review and compliance assessment with relevant laws and GasReg regulations. The committee's recommendations are shared with concerned parties and, if accepted, may be forwarded to the Board of Directors for approval. Disputes not resolved through recommendations result in detailed reports presented to the Board of Directors for decision-making.

In **Greece**, the Regulatory Authority for Energy (RAE) exclusively examines customer complaints related to regulatory supervision matters specified in regulatory decisions issued pursuant to the Energy Act. RAEWW does not handle disputes of a civil or commercial nature.

In **Israel**, the electricity regulator is responsible for examining complaints and disputes with electric companies. It assesses complaints, gathers references from involved parties and makes decisions on the matter. In some cases, issues may be escalated to plenary members for resolution.

In **Italy**, the regulator has established a dispute settlement body known as Servizio Conciliazione (www.conciliazione.arera.it). This body offers a free conciliation procedure for customers when suppliers provide unsatisfactory responses or fail to respond within the regulated deadline of 30 days. The procedure involves an online meeting where an independent professional mediator, appointed by the dispute settlement body, assists both parties in reaching an agreement. Customers can also have representation in this process, such as through consumer organisations. Agreements reached during this procedure hold legal value.

In **Jordan**, the regulator serves as an intermediary between consumers and distribution companies. EMRC handles complaints related to billing, service quality and other issues. By enforcing regulations and overseeing distribution companies, EMRC ensures fair practices and consumer protection.

In **Malta**, dispute resolution is governed by the Dispute Resolution (Procedures) Regulations, S.L.545.30, published in 2016. These regulations mandate the regulator, REWS, to issue determinations to resolve disputes within four months from the date of notification.

In **Montenegro**, the regulator resolves disputes between energy undertakings or between them and users of their services if the parties entrust the Agency. This process is regulated by the Rules for resolving disputes through arbitration adopted by the Agency.

In **Palestine**, the Palestinian Energy Regulatory Commission (PERC) handles various complaints and facilitates dispute resolution between distribution companies and consumers.

In **Portugal**, the regulator can provide information and clarification to consumers, recommend conflict resolutions and sanction companies if they are found to be in violation of the law or regulations. However, ERSE does not have the authority to impose specific solutions for disputes. Whenever ERSE's intervention is not sufficient to solve a concrete dispute, the regulator recommends consumers appeal to alternative dispute resolution means, like arbitration centres, with whom there are settled protocols.

In **Slovenia**, the regulatory agency is responsible for deciding on disputes between system users, electricity suppliers and market operators in both the first and second instances.

In **France** and **Spain**, the energy regulator lacks the competencies and authority to intervene in consumer dispute settlements with suppliers. In France, this responsibility falls under the purview of the National Energy Ombudsman (MNE). Meanwhile, due to **Lebanon's** lack of a fully functioning regulatory authority, there is little to no information available on the matter.

In **Türkiye**, EMRA provides instructions to natural gas distribution companies in line with the authority it receives from the law. It requests that disputes be resolved and consumers be informed about their applications.

3.3.3. Increasing Bill Understanding

Energy bills can often be misunderstood by consumers, leading regulatory authorities and energy providers to explore innovative strategies for enhancing transparency and accessibility. The drive to empower consumers and make them active participants in the energy market has resulted in various initiatives. For example, Albania has integrated QR codes into its electricity bills, while Spain provides detailed breakdowns of charges. The Mediterranean Region aims to equip consumers with the knowledge and tools necessary to understand their energy usage and costs effectively.

In **Albania**, ERE collaborates with operators and consumer protection associations to enhance energy bills for both households and non-household customers. Plans for the year 2023 include the incorporation of a QR code on electricity bills, providing consumers with pertinent information tailored to their billing periods.

Similarly, in **Algeria**, the regulator is collaborating with stakeholders to revamp and improve the readability of the energy bill, with the anticipated implementation scheduled for 2023–2024 to ensure better comprehension by all consumers.

In **Egypt**, gas suppliers are actively taking measures to enhance the clarity of gas bills. These efforts involve redesigning bills for improved understanding, providing informative materials and ensuring the availability of well-trained customer service representatives to assist consumers with inquiries.

In **France,** there is a mandate for electricity and natural gas suppliers to adapt communication and information to cater to consumers with disabilities, promoting inclusivity in the energy market.

In **Greece**, the Regulatory Authority for Energy (RAE) has approved a bill template designed to enhance transparency and simplicity in charges and contractual obligations. This initiative is aimed at assisting consumers in better understanding their energy bills.

In **Israel,** the focus is on graphic bill presentations, smart meter deployment and providing additional information through dedicated applications to improve consumer understanding and participation in energy consumption management.

Italy mandates suppliers to publish a 'guide to reading the bill' on their websites, explaining the information present on bills and where to find it.

Jordan is replacing conventional electricity meters with smart meters by 2025, enabling consumers to access energy consumption data and regulate their usage effectively.

In **Lebanon**, one of the Distribution Service Providers, BUS, which oversees North Lebanon, created an interactive link (http://www.bus.com.lb/customerservice/understandyourbill/61#understandyourbill=true&selectedarea=15) whereby the consumer understood how the bill is calculated.

Malta provides explanations on how to interpret bills on the supplier's website.

In **Morocco**, there is an obligation in cahier de charge to include both Arabic and French in the bill to make it broader for the public.

Portugal's ERSE financially supports projects like 'Fatura amiga' (https://www.fatura-amiga.pt/). ERSE also produced a video to help consumers understand the content of the invoice at https://www.erse.pt/comunicacao/multimedia/como-ler-uma-fatura-de-eletricidade-e-gas-natural/. In 2022, it also promoted a study on consumers' awareness of the bill (https://www.erse.pt/media/bh5mgzlv/relatoriofatura_2022.pdf).

Slovenia has established detailed rules for displaying information on electricity invoices through a general act, enhancing consumer comprehension.

Spain, in a 2021 resolution, has standardised the content of electricity bills, including graphs to explain costs, consumption and environmental impact, thereby ensuring consumers have access to vital information and resources.

3.4. Consumer Rights

This sub-chapter explores the actions a supplier should take if they intend to update their terms and conditions or modify the nature of a contract while it is ongoing. Additionally, it highlights the power of the consumer by demonstrating how individuals in any country can change their contracts or switch suppliers. It emphasises the importance of consumers maintaining a comprehensive understanding of the market, including prices, facilitated by the use of price comparison tools.

3.4.1. Supplier Terms and Conditions and Nature of Consumer Contracts

There are mechanisms in place to safeguard consumer rights, whether in regulated or free-market environments. In the Mediterranean region, there are some commonalities and distinctions among countries regarding suppliers notifying consumers and ensuring transparency and fairness in contractual amendments. Upon analysing and grouping the countries based on their similarities, certain key themes emerge, and they are as follows:

- **Advance Notification of Contract Changes:** Many countries, including Albania, Cyprus, France, Greece, Italy, Portugal and Slovenia, require suppliers to notify customers in advance (ranging from 15 days to 60 days) of any proposed changes to their supply contracts. This notification ensures that customers have time to consider and respond to alterations in their contractual terms.
- **Regulatory Approval:** In several countries, such as Albania, Algeria, Cyprus, Egypt and Montenegro, changes to contract terms often require approval from regulatory authorities or commissions. This

oversight ensures that contractual changes are made in compliance with relevant laws and regulations.

- **Automatic Revisions:** Algeria mentions that contracts are automatically revised in the event of changes in legislation or regulations, highlighting the need for contracts to remain in alignment with the law.
- **Consumer Rights:** Many countries, including Cyprus, France, Italy and Slovenia, emphasise the importance of informing consumers about their rights, such as the right to terminate the contract if they do not agree with proposed changes. This protects consumers from unilateral changes by suppliers.
- **Monopoly vs. Competitive Markets:** Some countries, like Israel and Jordan, have a regulated monopoly in electricity distribution, limiting consumer choice of suppliers. In contrast, others, such as BIH and Portugal, have introduced competitive markets, allowing consumers to choose their electricity suppliers.
- **Standardised Contracts:** Palestine and Montenegro mention standardised contracts for consumers, showing uniform terms and conditions applied across distribution companies.

The specifics per country can be seen below:

In **Albania**, suppliers are obliged to inform their customers of any changes in the contract terms at least 15 days before implementing these changes. This notification includes information about customers' rights to unilaterally terminate the supply contract. Moreover, any alterations to the contract terms must receive approval from the Albanian Regulatory Authority for Energy (ERE).

In **Algeria**, model supply contracts are established and approved by CREG in accordance with Executive Decree No. 10-95. The contract undergoes automatic revisions in the event of changes in legislation or regulations. Any other modifications to the contract require an amendment process.

In **BIH,** electricity customers have the freedom to choose their supplier in compliance with applicable laws and regulations. The SERC has established a framework enabling customers to exercise this choice and switch suppliers.

In **Cyprus**, consumers have the right to determine contract duration, renewal and termination terms, and receive advance notification of any changes to contractual terms. Suppliers are required to transparently inform customers of supply price adjustments and provide reasons, conditions and the scope of the adjustment. The CERA ensures that customers can terminate contracts if they disagree with new terms or price adjustments.

In **Egypt**, the terms and conditions of consumer contracts are subject to regulation, and any changes must be approved by the regulatory board of directors. Contracts for non-eligible consumers are typically fixed and do not allow for changes by consumers.

In **France**, suppliers must notify customers of any amendments to contractual conditions at least one month before implementation, either by post or electronically, based on customer preference. Changes to electricity pricing are subject to additional regulations under European law, and similar regulations for gas

pricing are expected following the Gas Directive recast. Customers have a three-month window to cancel contracts without penalty when notified of changes unless such changes are legally required.

In **Greece**, suppliers are required to inform consumers 60 calendar days in advance of any contractual changes taking effect, as mandated by Article 30 of the Electricity Supply Code.

In **Israel**, there is a monopoly on electricity transmission, distribution and supply. New providers must obtain licenses that specify consumer rates and plans. The monopoly is fully regulated, including rate and account configurations.

In **Italy**, suppliers can propose modifications to contract terms if the contract allows it. Customers must be notified in writing at least three months in advance, explaining the proposed changes and their rights, such as the right to change suppliers.

In **Jordan**, there is no free market for electricity distribution. Residents are bound to a single distribution company based on their place of residence, and the choice of distribution company is not available to consumers.

Malta has a single electricity supplier, and any changes in terms and conditions must be communicated to the regulator. Final consumers are to be informed in advance of such changes.

In **Montenegro**, suppliers are obligated by the Energy Law and General Conditions for Electricity Supply to publish any price and fee changes on their websites, ensuring consumers are informed and can opt to terminate contracts if they disagree with price changes.

Electricity supply contracts in **Palestine** are standardised for all consumers across distribution companies. Any changes to these contracts require approval from the Palestinian Electricity Regulatory Council (PERC).

In **Portugal**, suppliers may propose changes to contractual conditions at the end and during each contractual period, with specific contract provisions governing amendments. Loyalty contracts cannot be modified during their predefined periods unless it is in the consumer's interest and there is an express agreement.

In **Slovenia**, suppliers are required to notify household customers transparently and comprehensibly at least one month before changes to general contract terms or prices come into effect. Customers have the right to withdraw from the contract within one month of the change without penalty.

In **Spain**, consumers must be informed one month in advance of any contract changes in a clear and understandable manner. Contract modifications can typically occur at the end of the contract period or its extensions, with specific regulations governing these changes outlined in Law 24/2013, which pertains to the electricity sector.

In **Türkiye**, the contract terms to be signed with free consumers are determined freely, provided they do not contradict the relevant legislation.

3.4.2. Consumers Switching/Ending Contracts with Suppliers

BILLING ELEMENTS

In recent times, consumers have often gained the ability to choose their electricity and natural gas providers. This freedom to switch suppliers fosters competition, potentially lowering costs and enhancing service quality.

The following sections explore how different countries in the region facilitate this transition, including the legal frameworks, regulatory codes and practical steps involved. Each country's approach to switching suppliers reflects its unique energy market and consumer protection measures.

In **Albania**, electricity customers must adhere to a 30-day payment period after closing or suspending a contract with their suppliers. This regulation ensures the timely settlement of financial obligations. Additionally, customers are entitled to receive confirmation of fee collection interruption when terminating a contract, providing them with legal reassurance. In the case of contract disconnection, the supplier is responsible for taking the final meter reading and calculating the last bill, ensuring transparency in the process. Albania also grants customers the right to switch suppliers, even if they have outstanding debts with their previous suppliers, under certain conditions. This demonstrates a commitment to consumer choice while addressing financial responsibilities.

Algeria currently operates a regulated energy market with a single supplier, 'Sonelgaz-Distribution.' Consumers in Algeria do not have the option to switch suppliers, as there is no competition in the market. Contract termination can occur under specific circumstances, including contractual breaches, bankruptcy, or legal settlements, but these terminations do not involve switching to a different supplier. The one-month notice requirement for contract termination ensures a degree of predictability for both consumers and the distributor.

BIH features distinct yet very similar rules for supplier switching in different administrative units, including the Federation of BIH (FBIH), Republika Srpska (RS) and the Brčko District of BIH (BD BIH). Each unit has set up regulations in accordance with the relevant laws that enable customers to switch suppliers, ensuring consumers can choose their electricity provider.

Cyprus offers a consumer-friendly process for switching energy suppliers. Customers can change suppliers without incurring any charges, regardless of their consumption level. This promotes competition in the market and empowers consumers to make informed choices. The provision of a final closing bill within six weeks of switching ensures clarity and a financial settlement. Cyprus also encourages collective switching schemes, enhancing consumer protection and participation in the energy market.

In **Egypt**, eligible consumers can transfer from one distribution licensee to another by providing the first licensee with one month's notice or adhering to the period specified in their contract. This notification process ensures a smooth transition. It's noteworthy that both the subscriber and the first licensee are responsible for settling any financial accounts related to their contracts. The National Telecommunications Regulatory Authority (NTRA) can authorise the purchase of electricity from another licensee if there are unsettled amounts, with the assurance that the consumer will fulfil their obligations.

France's energy market allows consumers of all categories to switch suppliers effortlessly. The process simply involves signing a new contract with the desired supplier. Importantly, this switch comes at no

additional cost to the consumer. However, professional consumers with higher energy consumption may face penalties for early contract termination, serving to balance consumer flexibility with contractual obligations.

Greece has embraced a straightforward supplier-switching process. Consumers are free to choose a new supplier without incurring any charges. They must ensure that their existing contract has expired to avoid penalties. The new supplier manages the necessary formalities, streamlining the process and enhancing consumer accessibility to different energy providers.

Israel is amending its procedures to offer consumers greater flexibility. Under the proposed changes, consumers will have the choice to re-register in the name of the property owner when switching suppliers. This change aims to simplify the process and ensure a smooth transition for consumers between energy providers. Currently, the process involves consumers contacting their chosen provider and requesting a switch, with the change taking effect the month following the request. In the gas market, consumers are unable to change the supplier due to the presence of a natural monopoly; however, they have the right to change the marketer.

In **Italy**, consumers can switch to another supplier by subscribing to a supply contract with the new provider. To terminate their current contract, consumers must submit a written request to their existing supplier and ensure that all outstanding dues are settled. This process maintains financial transparency and allows consumers to transition to a new supplier efficiently.

Jordan's energy market operates on a regional basis, with each region served by a specific distribution company. This limits consumers' ability to switch suppliers within the same region. To change suppliers, consumers must relocate to a region served by a different distribution company. This regional structure restricts consumer choice within Jordan's energy market.

Malta's electricity market features a single established supplier, and consumers do not have the option to switch suppliers. To terminate their electricity supply, consumers must complete the necessary form and settle any pending dues. However, the lack of competition in the market limits consumer choice in terms of energy providers.

Montenegro has a structured process for consumers to switch suppliers. It involves consumers applying to the new supplier, data verification and the finalisation of a new supply contract. The entire process aims to ensure a smooth transition and adherence to financial obligations. The new contract starts on the day of the consumer's previous month's consumption.

Palestine's energy market includes distribution companies rather than suppliers. To terminate an energy supply contract, consumers must visit the distribution company and submit the necessary paperwork. There is no option for consumers to switch suppliers within the Palestinian energy market.

Portugal offers a straightforward process for consumers to switch suppliers. To change suppliers, consumers only need to contact the new supplier and enter into a new contract. It is also mandatory that the switching process be concluded within a maximum of three weeks. This streamlined process makes it easy for consumers to select their preferred energy provider.

Slovenia has well-defined procedures for switching suppliers in both the electricity and natural gas sectors. Consumers need to verify the status of their existing contracts, conclude new contracts with their chosen suppliers and follow specific steps to start the switch. This process ensures a smooth transition for consumers and fosters competition in the energy market.

In **Spain**, consumers can easily switch suppliers by signing a new contract with their chosen provider. The new supplier initiates a messaging procedure with the DSO to facilitate the switch, ensuring that consumers receive final energy readings and billing automatically. This process simplifies supplier switching for consumers and promotes market competition.

In **Türkiye**, customers have the option to terminate their contract with the distribution company by applying. To switch to a different supplier, the consumer must meet the conditions for free consumers, as without satisfying these requirements, changing suppliers is not feasible. However, if the consumer meets the necessary conditions, they can select a new supplier according to their personal preference.

Quick Look

BIH Case Study

There are separate but similar rules for the FBIH, the RS and the BD BIH setting up the supplier switching procedure passed by the relevant regulator, as follows:

- Rules on the supply of customers in the Brčko District of BIH with electricity passed by SERC,
- Rulebook on eligible customer supply and the procedure for supplier switching passed by FERK, and
- Rulebook on eligible customer supply and the procedure for supplier switching passed by RERS.

All of these rules have been passed in accordance with applicable laws and enable customers who want to switch their suppliers to do so.

Article 25 of the Rules on Supply of Customers in Brčko District of BIH with Electricity, passed by SERC, defines the steps taken in the supplier switching procedure as follows:

(1) An eligible customer wishing to switch its supplier shall be obligated to submit to the supplier from whom it wishes to be supplied an application on the form as prescribed by the supplier.

(2) The completed form referred to in Paragraph (1) of this Article shall include a statement, that is, an authorisation for the new supplier to take all required steps to switch the supplier.

(3) The new supplier, under the authorisation referred to in Paragraph (2) of this Article, shall submit a contract termination notice to the existing supplier no later than seven days from the day of receiving the application referred to in Paragraph (1) of this Article.

(4) The new supplier shall be obligated to submit a supplier switching application to the system operator on the form as prescribed by the system operator no later than seven days from the day of receiving the application referred to in Paragraph (1) of this Article.

(5) The supplier that receives the supply contract termination notice referred to in Paragraph (3) of this Article shall be obligated to make all data required for the completion of the contract termination procedure available to the system operator and new supplier no later than seven days from the day of receiving the notice.

(6) The distribution system operator shall be obligated to approve the application no later than ten days from the day of receiving the application referred to in Paragraph (4) of this Article, that is, to inform the new supplier of required changes to the application within the same deadline if there is a discrepancy with the contract on connection and network utilisation contract, and to inform the existing supplier with whom the contract shall be terminated of supplier switching and the contract termination date.

(7) The distribution system operator shall submit to the previous and new suppliers' data on the status of billing quantities at the end customer's metering devices at the time of commencing the application of the new contract no later than three days from the day of reading the billing metering device.

(8) The date of supplier switching, that is, the day of commencing the application of the new contract, shall be the day of reading the meter device.

(9) The eligible customer shall be obligated to regulate financial obligations towards the previous supplier when switching the supplier.

(10) The new supplier shall be obligated to ensure the compatibility of the supply contract, contract on connection, network utilisation contract and the relevant balance responsible party before the application of the new contract commences.

(11) The new supplier with whom the eligible customer has concluded a new contract in line with the system operator's approval referred to in Paragraph (6) of this Article shall submit a copy of the contract immediately after the conclusion of the contract to the system operator and balance responsible party in accordance with the provisions of General conditions for electricity supply, grid rules, market rules and balance responsibility contracts.

(12) When submitting the contract, the new supplier may omit commercial or confidential data or ask for the protection of their confidentiality.

(13) The supplier switching procedure may last no longer than 21 days.

Quick Look

Greece Case Study

In Greece, consumers enjoy the freedom to switch their electricity and natural gas suppliers at no additional cost following market liberalisation. The process is governed by specific regulations detailed in the Electricity Supply Code (Government Gazette, Series II, No. 832, 09.04.2013), as amended by Article 1 (Government Gazette, Series II, No. 1463, 24.05.2016), and the Natural Gas Supply Code (Government Gazette, Series II, No. 1969, 01.06.2018), also subject to amendments.

For Electricity Consumers:

- Market Freedom: Consumers have the liberty to choose their energy supplier for both residential and business purposes.
- Regulatory Framework: Guidelines for switching suppliers are outlined in the Electricity Supply Code (Government Gazette, Series II, No 832, 09.04.2013) and its subsequent amendments.
- Contract Check: Prior to switching, consumers need to ensure that the minimum contract term with their existing supplier has concluded to avoid any penalties.
- Switchover Request: Consumers initiate the switch by formally requesting the change from their chosen new supplier, clearly expressing their intention to switch.
- Contract Termination: The current contract can be terminated in writing by the consumer or through authorisation given to the new supplier.
- Supply Switchover Confirmation: The new supplier must furnish a supply switchover confirmation to the network operator (HEDNO S.A.) within 15 days of contract signing. For remote contracts, the supplier must provide the consumer with the contract, tariff details and a request cancellation form. The supply switchover confirmation is then submitted within three days after the 14-day cancellation period concludes.
- Effective Start Date: The new contract becomes effective the day before the supply switchover confirmation takes effect, with the specific date determined by the network operator.
- Switch Completion: HEDNO S.A. finalises the switch within two days of receiving the supply switchover confirmation, accounting for any restrictions, such as unpaid bills or electricity theft, as per the Supply Code and Network Operation Code.

For Gas Consumers:

- Supplier Selection: Consumers choose a new gas supplier based on their preferences.
- Supply Application: Consumers submit a Supply Application to the new supplier, accompanied by a written termination of their existing contract or authorisation for the new supplier to handle the termination.
- Debt Settlement: Consumers must settle any outstanding debts from their previous supply contract or adhere to the debt settlement policy of the previous supplier. Vulnerable Household Customers may have specific considerations.

- Change of Meter Representation: The new supplier submits a Request for Change of Meter Representation to the relevant DSO within five working days after concluding the supply agreement.
- Effective Date: The new contract takes effect on the date when the Change of Meter Representation Request is verified by the DSO.
- Debt Verification: The DSO verifies overdue debts with the previous supplier. The old supplier must respond within three days via the electronic system.
- Final Meter Reading: In the absence of overdue debts, the DSO performs a final on-site reading of the customer's consumption meter within ten calendar days of receiving the old supplier's response. Automatic readings apply to telemetering systems.
- Debt Resolution: Overdue debts trigger notification to the customer or new supplier (if acting on the customer's behalf). To complete the switch, the customer must settle debts, reach an agreement with the old supplier or request the new supplier to assume the debt.

These structured procedures ensure a smooth transition for Greek consumers when changing electricity and gas suppliers, fostering competition and consumer choice in the energy market.

3.4.3. Price Comparison Tools

The presence and functionality of energy price comparison tools vary widely from one country to another. This sub-chapter provides an overview of several nations and their respective stances on energy price comparison tools. While some countries have embraced these tools to empower consumers in selecting their energy providers, others have unique circumstances, such as uniform national pricing or regulatory limitations, that have led to the absence of such tools. Understanding the reasons behind the presence or absence of these tools sheds light on the dynamics of energy markets and consumer choices in these regions.

In **BIH**, a Price Comparison Tool was introduced in November 2018 through a collaborative effort involving various stakeholders. This ground-breaking tool in Southeast Europe provides customers with information on the electricity sector, consumption tips, guidance on switching suppliers, current prices and energy-saving advice. It is accessible at www.uporedistruju.ba and is overseen by the regulatory commissions in BIH, in cooperation with USAID.

Cyprus is developing a price comparison tool under the authority of CERA, as mandated by the law. A tender for consultancy services is forthcoming to create this tool.

France has a public and independent comparison tool for residential clients and micro-businesses, managed by the National Energy Ombudsman (MNE). Since 2022, CRE has calculated and made available an electricity reference price for small and medium-sized businesses every autumn. CRE is now doing the same every month for very small gas consumers since the end of regulated gas tariffs in June 2023.

Greece offers two public price comparison tools, one operated by RAEWW and the other by the Ministry of Development and Investments. Numerous private tools also exist. These tools provide information on consumer offers for the current month.

In **Italy**, ARERA publishes a public price comparison tool (www.ilportaleofferte.it) that covers all available customer offers. Private web-based tools are also accessible for comparison.

In **Palestine**, the reliance is on Distribution Companies, and tariffs are fixed for all customer categories. PERC reviews tariffs based on cost changes and recommends adjustments to the government.

Portugal has price comparison tools, with the NRA responsible for one of them, accessible at https://www.erse.pt/simuladores/precos-de-energia/.

Slovenia provides a comparison tool on the agency's website for consumers to assess energy prices.

Spain offers a comparison tool managed by CNMC, allowing consumers to review natural gas and electricity offers for domestic and small business customers. It is accessible at https://comparador.cnmc.gob.es/.

However, some countries do not have a price comparison tool. In examining their absence, several distinct factors and circumstances come to light.

In **Albania**, there is currently an absence of a functioning price comparison tool available for consumers. However, it is noteworthy to state that the Albanian regulator has completed the procurement of the Price Comparison Tool platform. During October and November 2023, the regulator's staff underwent training, and they will subsequently instruct the suppliers on the modalities of using the platform. The platform is expected to enter full operation in the first days of January 2024.

In **Algeria**, the absence of such tools is attributed to uniform energy pricing across the entire nation, negating the necessity for comparison tools. **Egypt's** lack of price comparison tools is a consequence of energy prices being determined by prime ministerial decrees, resulting in standardised rates that are not subject to market competition. **Israel's** regulatory authorities do not provide a consumer comparison tool, possibly due to the emerging nature of this field as of the 2021 information cut-off. No specific information is available concerning the presence of price comparison tools in Lebanon. Meanwhile, in **Malta**, these tools are deemed inapplicable as there is only a single electricity supplier, precluding consumer choices for comparison. Similarly, **Montenegro** lacks price comparison tools because it has just one energy supplier offering various tariff packages, thus limiting the demand for such tools. **Türkiye** also has no price comparison tool yet.

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CONCLUSIONS

CONCLUSION

Consumer protection lies at the heart of regulatory oversight, and this report places a strong emphasis on the pivotal role regulators play in ensuring that consumers are treated fairly and justly. Regulators assume multidimensional responsibilities in safeguarding consumer interests.

A central theme of this report is the imperative for clear and transparent communication between regulators, energy market stakeholders (suppliers and DSOs), and consumers. Effective collaboration with a range of stakeholders, including ministries, energy companies and consumer protection and competition organisations, is highlighted as a cornerstone of successful regulatory practices. Indeed, all countries have unique particularities. However, a regulatory-centred collaborative approach with stakeholders ensures that consumers' interests are represented and protected at every level of decision-making, policy formulation and implementation, while still ensuring that the market functions well with all parties benefiting.

The report has also found that outreach and awareness campaigns are instrumental tools employed by regulators to empower consumers and transform them from passive consumers to active participants in the energy market. These initiatives bridge the gap between regulators, suppliers and consumers, ensuring that information flows transparently and that consumers are educated and informed. Whether fostering communication between the regulator and consumers or between suppliers and consumers, these channels serve as avenues for information dissemination across various scopes, as well as tools for problem-solving.

Billing Elements takes centre stage as an example to demonstrate consumers' rights and how they can be protected. The report emphasises that Billing Elements serve as an exemplar showcasing best billing practices, thereby preventing misunderstandings and disputes. Upon delving deeper into this chapter, one would notice that it meticulously explores the details of metering, bill contents, compliance monitoring and dispute resolution mechanisms. Among the topics discussed is that not all countries have the same legal definition for a 'bill'; a few countries highlighted that for a bill to be legally referred to as a 'bill,' it must include the exact reading of the consumption and should not be an estimate.

Regulators, as vigilant protectors of consumer rights, oversee processes related to billing elements and have a direct or indirect impact to ensure that consumers receive accurate bills and have options in case of disputes. Although there is diversity in the way complaints are filed, it is important to note that all regulators play a role in addressing these concerns in one way or another.

Consumer rights are woven into the fabric of the regulatory framework and regulators must establish rules and standards that safeguard consumers. These rights extend to supplier terms and conditions, contract termination and access to price comparison tools. The report has found that some countries handle such procedures in diverse ways, while others show some similarities. Furthermore, the importance of having a price comparison tool in liberalised (open) markets has been agreed upon by the members, as they help consumers choose the offer that suits them best. Regulators, in their role as advocates, create an environment where consumers can make informed choices, switch suppliers when necessary and access the information they need to compare prices and make the best decisions.

CONCLUSION

In a dynamic energy market landscape, these guidelines, in the form of successful practices performed in the region, provide an invaluable framework for regulators and energy market stakeholders to navigate the complexities of consumer protection. The report serves as a practical resource to enhance consumer confidence, promote fairness, and ensure transparency in regulated industries.

Ultimately, this report reaffirms the regulator's commitment to supporting the end consumer. Regulators are not just enforcers of rules but also tireless advocates for consumers, working diligently to ensure their protection, empowerment, and satisfaction.

Recommendations and Way Forward

To further advance the goals outlined in the report and enhance consumer protection in the energy market, some steps are recommended to be taken.

Encouraging ongoing collaboration between regulators, energy market stakeholders, ministries, energy companies, and consumer protection and competition organizations is necessary. Regular meetings, forums, and working groups can facilitate dialogue, information sharing, and joint problem-solving.

It is also recommended to build on the success of outreach and awareness campaigns by regulators, considering expanding these initiatives to reach a broader audience and utilising more diverse communication channels.

Furthermore, it is significant for all countries to promote the development of uniform consumer rights protection standards, covering aspects such as supplier terms and conditions, contract termination, and access to price comparison tools. This can ensure a baseline level of protection for consumers across diverse regulatory environments.

Strengthening Dispute Resolution Mechanisms is also mandatory. It would be sensible to ensure that consumers have accessible and effective avenues to address complaints, and regulators should play an active role in resolving disputes promptly and fairly.

Lastly, facilitating ongoing knowledge exchange and experience sharing among countries in the region is key, although, it should be highlighted that one solution does not fit all. However, encouraging regulatory authorities to learn from each other's successes and challenges can have a major boost in capacities and abilities. Indeed, this report serves as a written medium of the process of knowledge dissemination between the countries of the Mediterranean region, and this is how MEDREG excels, where it acts as a bridge between the different regulatory authorities in the area. MEDREG's collaborative framework helps chart the way forward. Furthermore, as MEDREG is a platform for the exchange of know-how with a key mission to harmonise regulatory frameworks in the region, the report seeks to leverage cooperation to establish a stable, and secure Mediterranean Energy Market.

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