

TREATMENT OF VULNERABLE CONSUMERS IN THE MEDITERRANEAN COUNTRIES



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Consumer
Working group
(CUS WG)

ABSTRACT

This document (Med20-30GA – 3.1.7) presents a report on the situation of vulnerable consumers among MEDREG members.

This document provides an overview of the situation across MEDREG members states as it regards the treatment of vulnerable consumers. The state of play has been presented through an analysis of the types of support and models applied for the protection of vulnerable consumers, which includes understanding and definition of vulnerable consumers, specific support schemes from energy and/or social welfare system, types of support and coverage of costs as well as examples of best practices.

The analysis of the situation is based on the contribution provided by MEDREG members through filled questionnaires. The same questionnaire has been used in 2016 when the first Vulnerable Consumer Report¹ was developed. This document will also provide a comparative analysis, aiming to note the progress made during the four-year period by comparing the current situation against the situation in 2016.

The report provides recommendations aiming to improve the situation of vulnerable consumers and their protection, with the objective of guiding MEDREG members on taking feasible, sustainable and adequately responsive measures, according to the economic and social situation of their country.

Keywords: vulnerable consumer, energy poverty, protection measures, economic and non-economic support schemes, MEDREG members.

¹ Vulnerable Consumers Report, Working Group on Consumers Issues, Malta, 18/05/2016 found at http://www.medreg-regulators.org/Portals/_default/Skede/Allegati/Skeda4506-116-2016.7.5/MEDREG_Vulnerable_Consumers_report_final.pdf?IDUNI=oghqj-mtbbc034ame5elhkghv589

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DISCLAIMER

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ABOUT MEDREG

MEDREG is the Association of Mediterranean Energy Regulators, bringing together 27 regulators from 22 countries, spanning the European Union, the Balkans and North Africa.

Mediterranean regulators work together to promote greater harmony in regional energy markets and legislations, seeking progressive market integration in the Euro-Mediterranean basin.

Through constant cooperation and information exchange between members, MEDREG aims at fostering consumers rights, energy efficiency, infrastructure investment and development, based on secure, safe, cost-effective and environmentally sustainable energy systems.

MEDREG acts as a platform providing information exchange and assistance to its members as well as capacity development activities through webinars, training sessions and workshops.

The MEDREG Secretariat is located in Milan, Italy. This report is the result of work carried out by the MEDREG Consumers Working Group (CUS WG), which provided the data and comments. MEDREG wishes to thank the CUS WG for their contribution and efforts, and would like to give a special thanks to the support of the consultant Ms. Zyhrada Kongoli in drafting the report.

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

RELATED DOCUMENTS

MEDREG documents

• “Vulnerable Consumers Report”, Working Group Consumers Issues, May 2016, Ref. Med16-21GA-4.5.1, http://www.medreg-regulators.org/Portals/_default/Skede/Allegati/Skeda4506-116-2016.7.5/MEDREG_Vulnerable_Consumers_report_final.pdf?IDUNI=oghqlmtbbc034ame5elhkghv589;

External documents

• Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU, <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1602757943678&uri=CELEX:32019L0944>

• Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC, <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32009L0073>

• Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2018.328.01.0001.01.ENG

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EXECUTIVE SUMMARY

Protection of vulnerable energy consumers has been addressed in different ways in different countries across the Mediterranean region due to particular circumstances in each country with regard to the social, economic and energy situation. For this purpose, MEDREG is committed to assess the current situation and provide recommendations aiming to ensure that vulnerable consumers, wherever they live, enjoy a high level of protection in all member states in the Mediterranean region.

Protection of vulnerable consumers has been acknowledged and promoted as one of the basic rights of energy consumers. The principles on the basis of the energy market call for fair treatment of consumers. In particular, vulnerable consumers have to be treated fairly among themselves and in relation to other energy consumers. The energy markets, at the European level and beyond, are becoming more consumer-centric, providing for extended rights of energy consumers. In this respect, the protection of vulnerable consumers is gaining more importance.

Protection of vulnerable consumers is an issue of utmost importance due to its impact on the lives of people and the high sensitivity of the matter. The scope of vulnerability is wide and so is the scope of protection. In this report, focus has been placed on energy consumers from vulnerable households and on the nature of protection measures. The objective is to highlight the most adequate measures and to recommend ways of improvement towards more inclusive, transparent and accountable measures and processes.

The management of protection of vulnerable consumers is a very important and critical process. Ideally, it starts with having legislation or policy in place, the implementation of which is supported by a system, and consists of well-designed products targeting particular groups of vulnerable consumers. All these stages need to be periodically assessed, based on their impact, and reviewed, if there is room for improvement. The protection measures need to be backed up by a protection system, which guarantees the safeguarding of protection principles and the fairness of the process. Identification of vulnerable consumers is not always an easy job as, in many cases, vulnerable consumers are not

able to or fail to handle the required procedures for benefitting from protection measures. Therefore, a system that is linked with social, welfare and health databases, and works on the basis of the vulnerability criteria approach, can generate a reliable list of vulnerable consumers, at any given time.

The COVID-19 pandemic has created sharper challenges for countries due to increased domestic demand for energy linked to confinement measures and increased number of economically vulnerable persons. The combination of increased energy use with the financial hardships of many households has aggravated the situation of vulnerable energy consumers. Therefore, the mechanisms and schemes established to identify and provide support to vulnerable consumers should be flexible and efficient in ensuring adequate coverage.

Due to the differences in the socio-economic situation, the response to vulnerability has been different in different countries. Though, regardless of the approach adopted in each country, all MEDREG members have measures in place targeting vulnerable energy consumers.

Based on the best practices reported by the respondent countries, and the need for more inclusive and accountable protection policies for vulnerable consumers, it is recommended that the countries lacking the following measures shall:

- develop definitions for vulnerable consumers and energy poverty, as well as policies and objectives in addressing the needs of vulnerable consumers and reducing the number of energy poor consumers
- enhance interaction among involved entities to adequately identify and protect vulnerable customers
- establish systems of automatic recognition of vulnerable consumers in order to not leave behind consumers that, due to health conditions or low levels of literacy, cannot access the protection measures
- develop protection measures that respond to the needs of vulnerable consumers adequately, fairly and sustainably
- assess the impact of the protection measures continuously

1

INTRODUCTION

The CUS WG works consistently to enhance the protection of household consumers in the MEDREG countries, as a prerequisite for their economic and social wellbeing. In this respect, this report intends to update the information on the state of play with regard to the protection of vulnerable consumers across MEDREG countries, compared to 2016 and as reflected in the first report on this issue¹.

The National Regulatory Authorities (NRAs) have a great role to play in protecting the consumers' rights and, in particular, vulnerable consumers' rights. The recent policy and legal documents at the European level recommend that Regulatory Authorities should be granted powers to ensure high standards of public support to vulnerable consumers and the full effectiveness of protection measures for those consumers, in particular. Therefore, the findings and recommendations of this document aim to guide the work and involvement of NRAs in ensuring reliable criteria and adequate protection for vulnerable consumers.

The information provided and analysed in this document is based on the contribution of MEDREG members collected through questionnaires filled and submitted by 17 countries, including Albania, Algeria, Cyprus, Egypt, France, Greece, Italy, Jordan, Lebanon, Malta, Montenegro, Portugal, Slovenia, Spain, Palestine, Israel and Turkey, as reflected in the Annex attached to the report.

1.1 Methodology

To gather the intended information, a questionnaire was developed and shared with MEDREG members. The questionnaire consisted

of several questions, closed and open, designed to collect as much information on the situation of vulnerable energy consumers and their protection. The questionnaire contained separate sections for the electricity and gas sectors.

The questionnaires were circulated to all 22 member countries to be filled out by the NRAs. The MEDREG Secretariat received 19 responses from 17 countries.

1.2 Objective of the report

The objective of this report is to provide an overview of the situation as regards the level of protection of vulnerable consumers across MEDREG members, to note the improvements compared to the situation captured in the report of year 2016, and to provide recommendations for advancing the issue of vulnerable consumers protection to a next level, making reference to the recent policy developments and best practices.

¹ Available on MEDREG website: <http://www.medreg-regulators.org/Publications/Consumers.aspx>

2

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2

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2.1 Existence of a definition of “vulnerable consumer” and “energy poverty” in the legislation and the nature of definition

The existence, or lack, of a definition does not provide much information on the degree of protection in a given country, but rather on the comprehensibility of the term and on whether the protection is based on a well-defined concept. The response to the question of whether there is a definition on “vulnerable consumers” gives information on whether this issue has already been addressed by the energy legislation in a given country and on how this term is understood in that country.

In the context of the measures to protect vulnerable consumers¹, in the EU, the member states are required to define the concept of vulnerable consumers. The same provision which

¹ Article 28 of the Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU.

requires member states to define the concept of vulnerable consumers also suggests the criteria to be taken into consideration, such as income levels, the share of energy expenditure out of disposable income, dependence on electrical equipment for health reasons, age and energy efficiency of homes, among others. In this report, particular attention shall be paid to consumers living in remote areas.

The majority of the respondent countries state that a definition of vulnerable consumers exists in their country (see Figure 1). In 12 out of 17 respondent countries, there is a definition in the legislation. This is the case in Albania, Cyprus, France, Greece, Italy, Malta, Montenegro, Portugal, Slovenia, Spain, Palestine and Israel. Croatia also uses a specific definition of vulnerable consumers for both electricity and gas².

² ACER/CEER Annual Report on the Results of Monitoring the Internal Electricity and Gas Markets in 2018, October 2019, page 17, checked on Nov 1, 2020. Available at <https://www.ceer.eu/documents/104400/6693346/ACER+Market+Monitoring+Report+2018+-+Consumer+Protection+and+Empowerment+Volume%281%29/dad05c46-f5ae-936d-4a21-d66c508ea5bf>

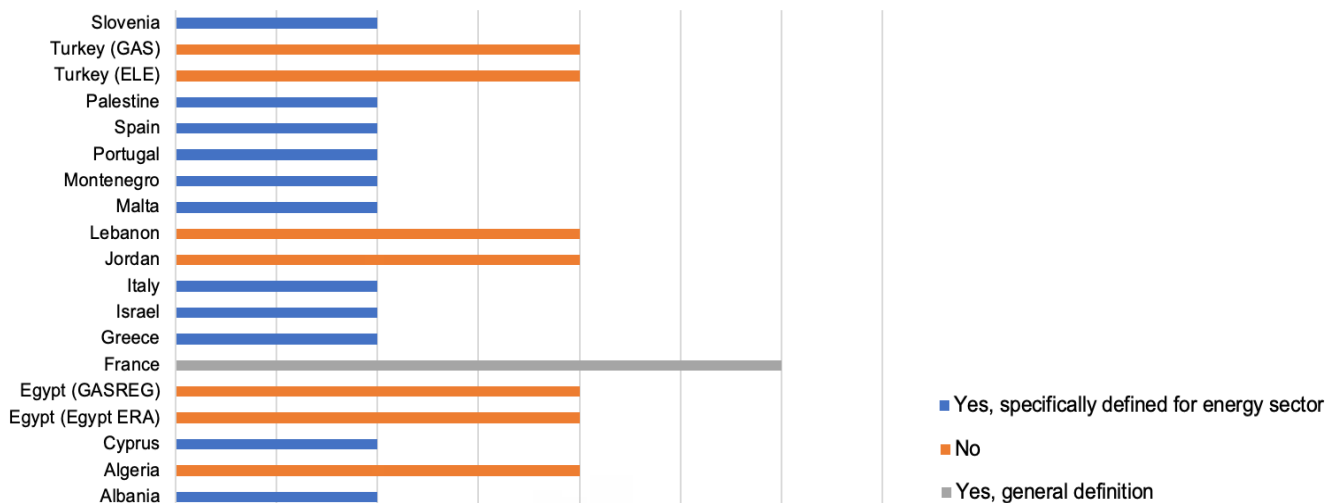


Figure 1. Definition of a “vulnerable consumer” in the legislation

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Compared to the 2016 report, the situation remains the same for Algeria, Egypt, Jordan and Turkey. These countries still do not have a definition in place for a vulnerable consumer. In Egypt, GASREG specified that there is no definition in place; but according to the Gas Law, there are only two kinds of consumers: eligible and non-eligible. The definition of non-eligible consumer as per the law "means a consumer supplied by natural gas in accordance with the price set by the cabinet of minister".

With regard to the nature of the definition, whether it is specific for electricity and gas usage or a general one, in seven countries, Albania, Cyprus, Malta, Portugal, Slovenia, Spain and Israel, there is a specific definition for electricity usage. In the case of Albania, Cyprus and Portugal, a specific definition for gas usage also exists. In the case of France, it's reported that the definition is general, but the content of the definition points

out energy in a security context. Thus, it seems that the definition of vulnerable consumers refers specifically to the energy sector.

Concerning the concept of "energy poverty", there are only few cases (three) among the respondent countries that have a definition for the same, as in the case of Cyprus, France and Spain. In fact, the concept of vulnerable consumer is linked to energy poverty and includes it.

However, it is recommended that the states have to establish a set of criteria for energy poverty nonetheless. Addressing of the needs of energy poor consumers is also very critical. Typically, the criteria of households in energy poverty includes those with low incomes and high energy expenditure with disposable income, but also poor energy efficiency.

Figure 2. Definition of a "vulnerable consumer" for energy sector¹.

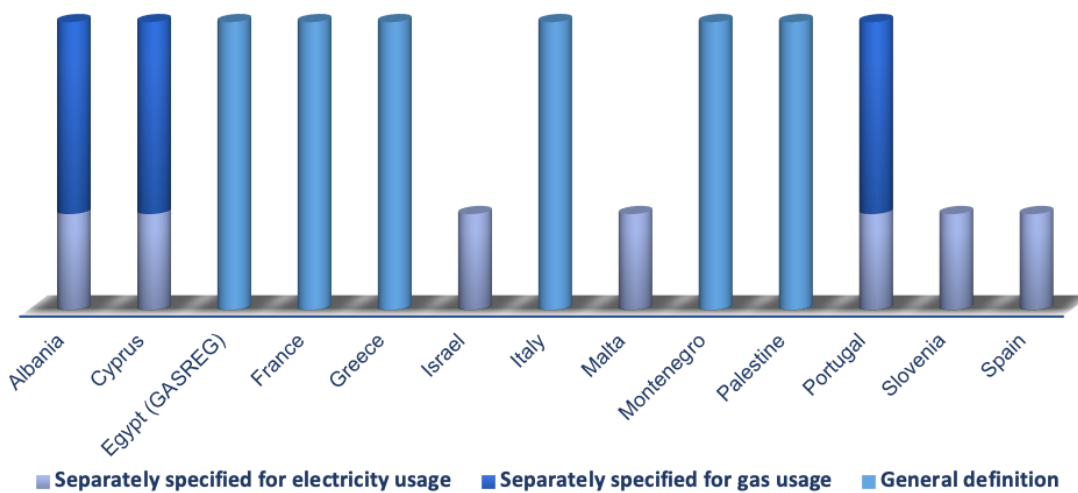
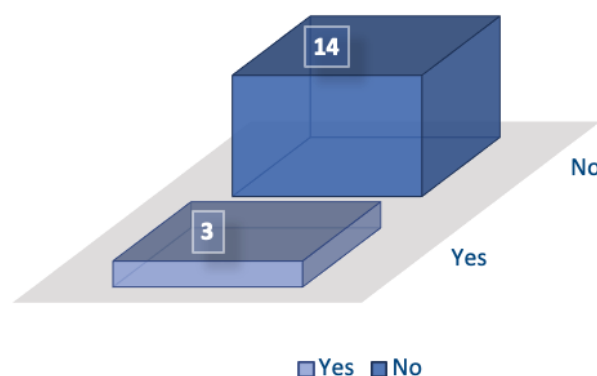
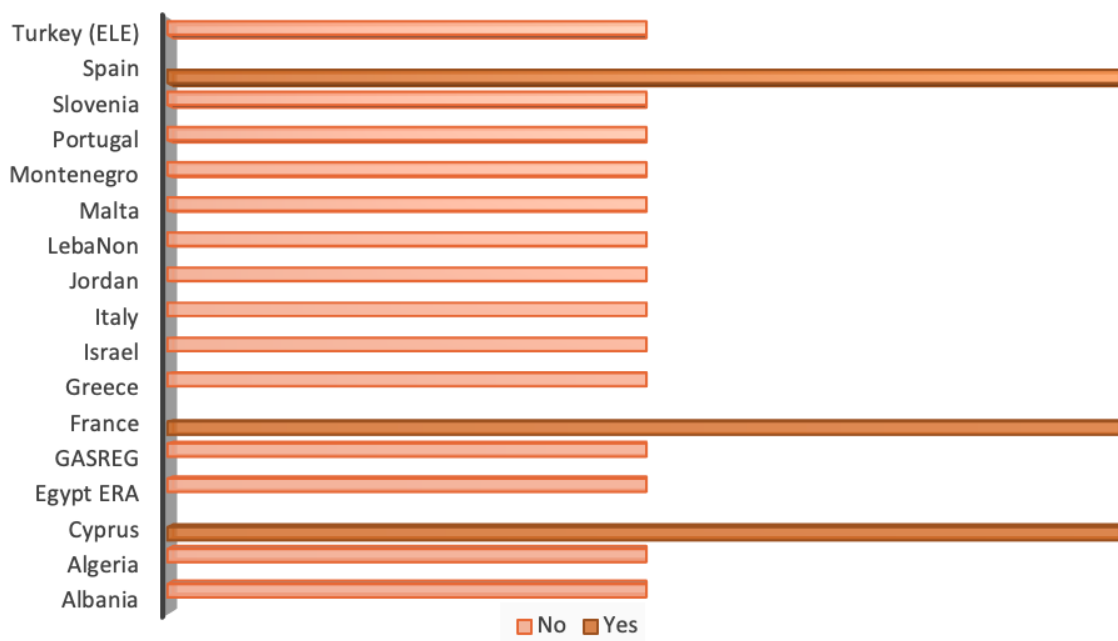


Figure 3. Definition of "energy poverty" in the different countries



¹ Not all countries responded to the question.

Figure 4. Definition of “energy poverty” in the different countries¹.



¹ Not all countries responded to the question.

In the EU, it's recommended that member states should assess the number of households suffering from energy poverty and prioritise part of the national action plans to reduce the number of such households. Even though the criteria for the vulnerable energy consumer and for households in energy poverty are similar, the methods of approaching these two different manifestations of vulnerability are different. While in the case of vulnerable consumers, the countries should take protective measures, the main challenge in the case of energy poor households is to reduce the number of such households. Hence, it is recommended that all countries should establish a definition of vulnerable consumers and a set of criteria for households suffering from energy poverty.

2.2 Content of the definition or the criteria for obtaining the status of “vulnerable consumers”

The existence of a definition for vulnerable consumers, or the existence of criteria on the basis of which the status of a vulnerable consumer can be obtained, is very much related to clarity, transparency and liability of the process of declaring the status of vulnerable consumers and, simultaneously, the level of adequacy and

coverage of relevant protection measures.

Even though a general understanding of the term “vulnerable consumer” may be self-explanatory, the definition of this term not only contributes to a structured understanding, but also directly affects the outcome of granting the status. What is more critical is that it concurrently affects the granting of support and the adequate cover of vulnerable consumers.

For this purpose, the EU Directive 2019/944 on common rules for the internal market calls member states to take appropriate measures to protect consumers and, in particular, to ensure that there are safeguards to protect vulnerable consumers. In this perspective, it requires member states to define the concept of vulnerable consumer.

The same Directive highlights the obligation of public services to take protective measures for consumers, in particular, for vulnerable consumers. It suggests criteria to be taken into consideration as well as protection measures. However, each country has the freedom to take the necessary measures to protect its vulnerable consumers. Such measures shall be designed to fit with the profile of the vulnerable consumer in

that country and should comply with social and energy policy frameworks in place. They should also be achievable in case of setting a price and/or affordable from a financial perspective, in terms of cost coverage.

For the above reasons, there are some elements that shall be taken into consideration and assessed when defining the concept of vulnerable consumer and when designing the respective protection measures. A definition generally entails criteria which serve to qualify a consumer as vulnerable when meeting at least one of them, as there are cases when a consumer meets simultaneously more than criteria.

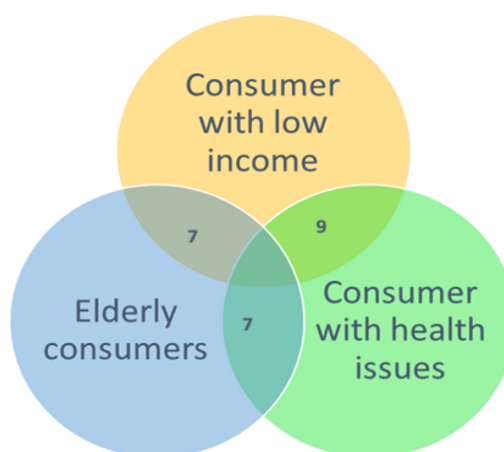


Figure 5. Most common criteria¹.

As we discuss the definition and criteria, which go hand in hand, we can note that the criteria referred to by almost all respondent countries, including those that do not have a definition of the term “vulnerable consumer”, have witness common economic and social conditions of the consumers, particularly health and age.

The way the countries have formulated the definitions and criteria is different and provides for a wide base of protection criteria, which can serve as food for thought in the process of reviewing criteria in each country, with the larger objective of leaving no vulnerable consumer behind. The table below provides information on how the different countries have formulated the criteria and/or the definition for vulnerable consumers.

Table 1. Most common criteria²

Responses	Consumers with low income	Elderly consumers	Health criteria
Countries			
Albania	X		
Cyprus	X	X	X
Egypt	X		
France		X	X
Greece	X	X	X
Israel		X	
Italy	X		X
Malta	X	X	X
Montenegro	X		X
Portugal	X	X	X
Spain	X	X	

¹ Not all countries responded to the question.

² Not all countries responded to the question.

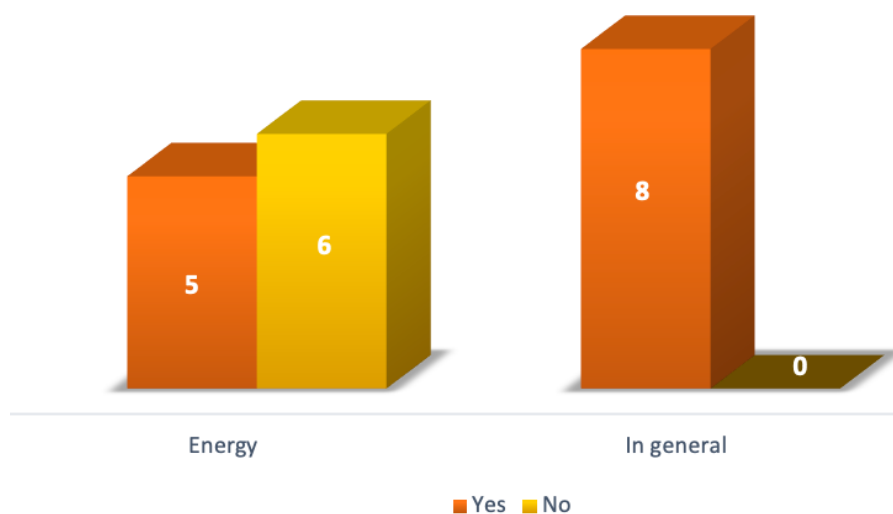
In the vast majority of the respondent countries, there are criteria for obtaining the status of vulnerable consumers for electricity, as in the case of Albania, Cyprus, France, Greece, Italy, Jordan, Malta, Montenegro, Portugal, Slovenia, Spain and Israel. In fewer countries, there are criteria set for the gas sector, as in the case of Albania, Egypt, Slovenia and Portugal. Even though there are criteria related to vulnerable consumers in the gas sector of Albania, no support scheme is yet active in gas sector.

2.3 Existence of support schemes within the energy sector and/or under social welfare schemes

The existence of support schemes and their source, in terms of their origin from the energy

sector and/or social welfare schemes, doesn't make any difference as far as the protection of vulnerable consumers is concerned. However, information on the support schemes within the energy sector or social welfare system leads to identification of the responsible state authority, as the state has the sole responsibility for safeguarding the rights of vulnerable consumers. It is very important to see that there are support schemes across MEDREG countries and it is less relevant to understand if they come from the energy sector for energy consumers or from the social welfare system for energy consumers. On the other hand, taking into consideration the primary role of state in designing and implementing support schemes for vulnerable consumers, it is interesting to see how the different responsible state agencies from energy or social welfare sectors respond to the needs of vulnerable consumers.

Figure 6. If specific support scheme for vulnerable consumers does not exist within the energy sector, does the general social welfare system protect them? With respect to energy/gas:



Theoretically, the energy regulatory bodies and governmental bodies having responsibilities for the energy sector are more likely to recognise and better manage the needs of their consumers. In addition, the effects/costs of protection measures applied to vulnerable consumers are more likely to be better mitigated within the energy sector. Likewise, the vulnerable energy consumers can attain higher attention from the energy sector rather than the social welfare system which has diverse vulnerable categories to accommodate .

Provided that the welfare systems are designed in a way to serve to the vulnerable groups, there are chances that automatic granting of the status of vulnerable consumer, if applicable, and the data checking processes are more effective within welfare systems.

In the case of MEDREG countries, there are countries that support vulnerable consumers within the

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energy sector, such as Albania, Cyprus, Egypt, France, Greece, Italy, Jordan, Lebanon, Montenegro, Portugal, Slovenia, Spain, Palestine and Israel. There are other cases when vulnerable consumers are supported with respect to energy, albeit through social welfare systems, such as in Algeria, Malta and Turkey. In the case of Albania and Palestine, the vulnerable energy consumers are supported simultaneously by the energy sector and social welfare system.

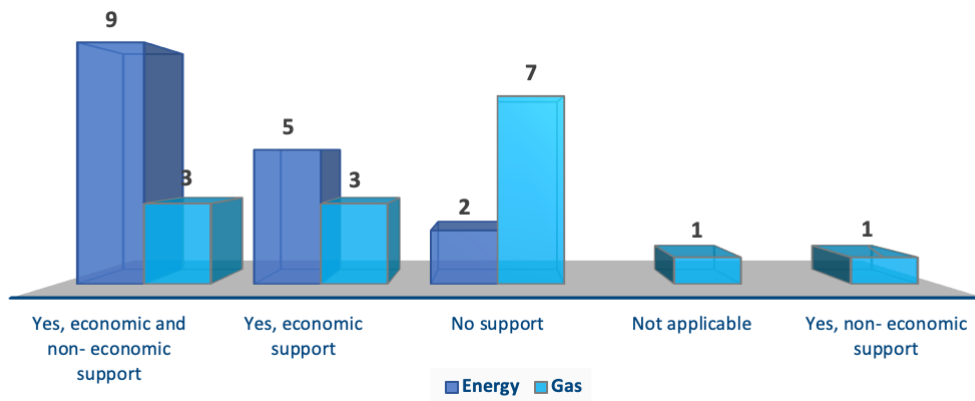


Figure 7. Scheme for vulnerable consumers within the energy and gas sector¹.

In the majority of cases, the support given is economic and non-economic. A combination of economic and non-economic support is reported only for electricity in the case of Albania, Cyprus, Jordan, Montenegro, Palestine and Israel. Economic and non-economic support is provided both for electricity and gas in France and Spain. While in Egypt, Italy and Portugal, economic support is provided only for the electricity and gas sector. In case of Greece, economic and non-economic support is provided for electricity and non-economic support is provided for gas. In Slovenia, only non-economic support is provided for the electricity and gas sector.

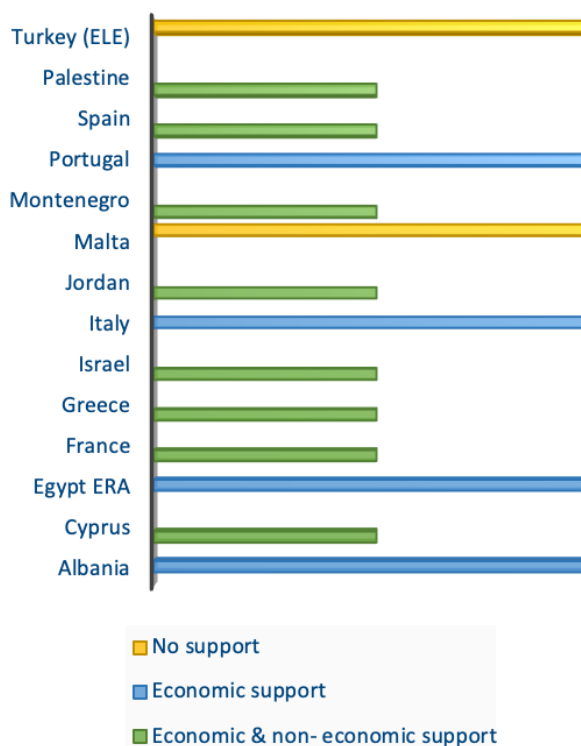


Figure 8. Scheme for vulnerable consumers within the electricity sector

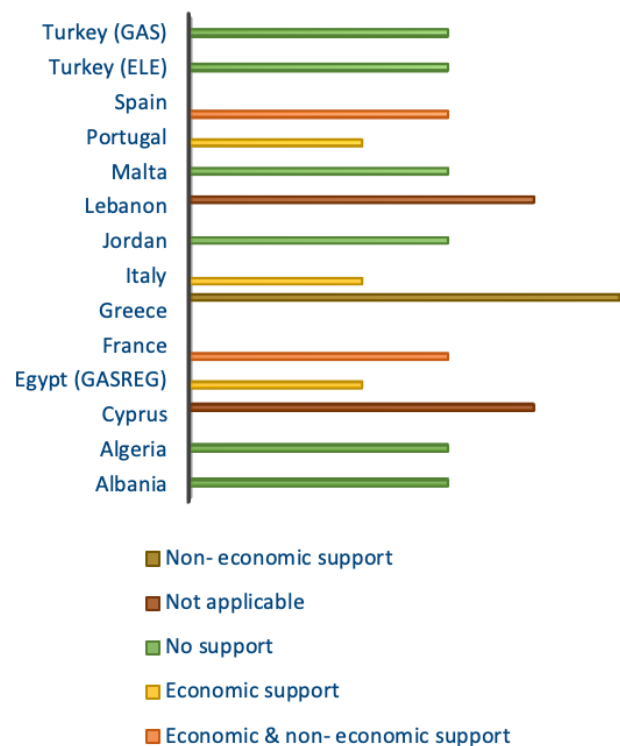


Figure 9. Scheme for vulnerable consumers within the gas sector

¹ Not all countries responded to the question.

2.4 Consumer categories that receive support within the energy sector

Identification of consumer categories that receive support within the energy sector contributes towards the profiling of vulnerable consumers in a given country. Adequate profiling then contributes to the adequate coverage of vulnerable consumers in need for protection.

Across MEDREG countries, there are different categories of consumers which receive economic and non-economic support within the energy sector. An umbrella criterion that is not stated explicitly, but is found in all support schemes in respondent countries, refers to the qualification as household consumers.

While in the majority of countries, the concept of vulnerable consumers relates only to household consumers, there are exceptions when the support schemes for vulnerable consumers extends to small- and medium-sized businesses, especially in the agriculture sector. In the case of Egypt, beneficiaries of support schemes for vulnerable consumers also include non-household consumers from the agriculture sector. In Jordan, the categories of vulnerable consumer also include small- and medium-sized industries as well as the agricultural sector.

In the case of Lebanon, a different approach is taken where differentiated electricity tariffs are applied to a wide range of public and private activities. The beneficiaries of support schemes are grouped into categories on the basis of voltage classifications (low, medium and high tension fees). They are then sub-grouped into categories on the basis of purpose of use (lighting for personal or business use), on the basis of purpose and sensitivity of activity (hospitals, medical care centres, mosques and churches, hotels, cinemas and street lighting) and on the basis of scope of activity (industry, craft sector, agriculture, water treatment and pumping stations).

Vulnerable consumers in all cases include low-income consumers/families, including retired persons and consumers with health issues. In the case of Algeria, residents living in the southern region, where the climate conditions are severe, are specifically targeted. This is the same as in the case of Cyprus, where vulnerable categories

include customs in remote areas. In some of the respondent countries, the size of the household is considered as a criterion for categorisation. Bigger families are included as beneficiaries of vulnerable protection measures, and the bigger the household, the higher the protection provided. This is seen in Italy, Cyprus, Spain and Greece.

As the countries have developed protection measures on the basis of common drivers of vulnerability, only the formulation of the criteria or the names of the categories is different. However, there are some noticeable differences which are mostly related to the profile of vulnerable consumers in a given country and the socio-economic situation of that country.

2.5 Types of support granted to vulnerable consumers

The protection schemes provide for different types of economic and non-economic support. In many cases, combined types of support are provided to vulnerable consumers to ensure effective and continuous protection.

The respondent MEDREG countries report different ways of providing support to vulnerable consumers. These types of economic support are more diverse as compared to non-economic support. There are cases when more than one type of support schemes or complementary support measures are applied, both economic and non-economic.

In some of the respondent countries, a specific reduced or regulated tariff is applied which is sometimes called social tariffs. This is seen in Albania, Cyprus, Egypt, Greece, Jordan, Lebanon, Portugal, Spain, Palestine, Israel and Turkey. In the case of Algeria, the tariff is applied uniformly while there is a particular part of the tariff, considered "social segment", that is applied to all household consumers (125 KW for electricity and 1125 Th for gas). Such a social tariff has been applied in France as well, but since 2018, the financial assistance in the form of energy voucher has replaced it.

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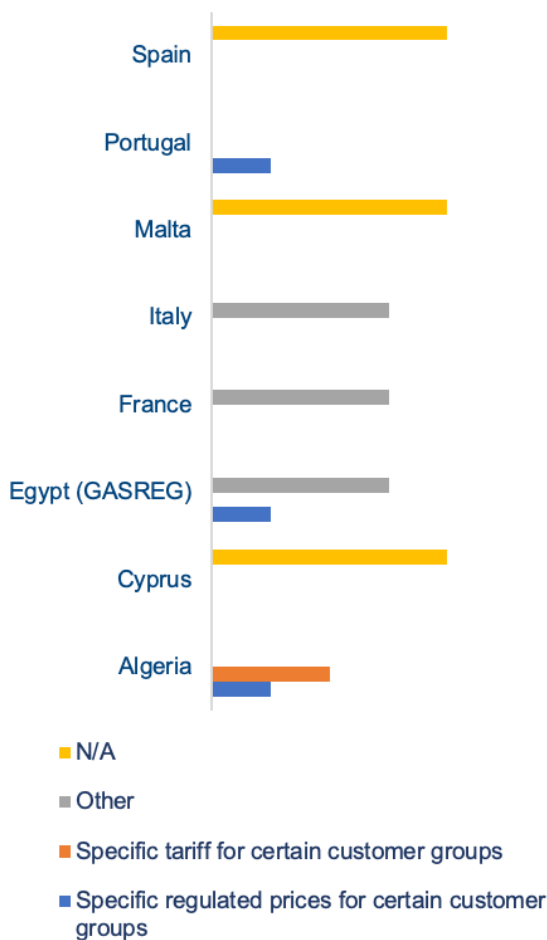


Figure 10. What does economic support system within the energy sector consist of? Gas

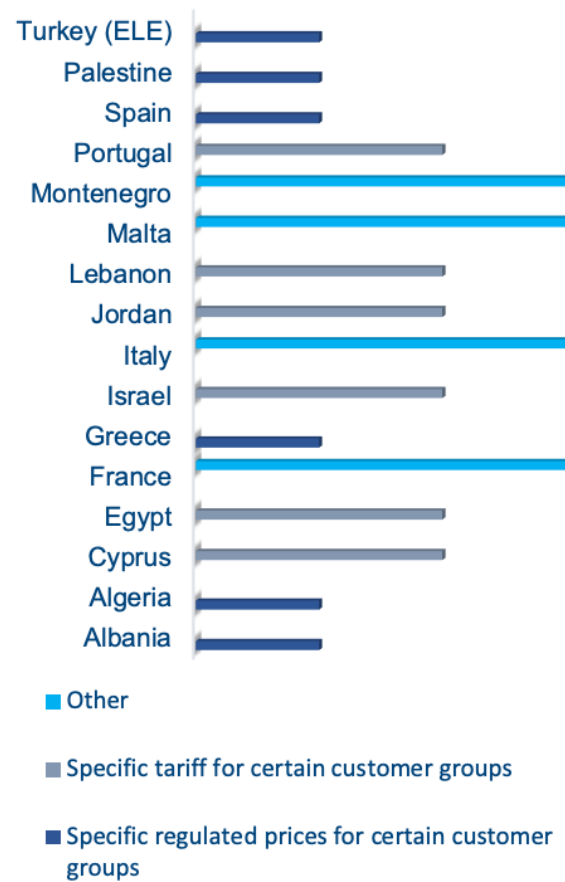


Figure 11. What does economic support system within the energy sector consist of? Electricity

Another type of economic support applied in some of respondent countries consists of discounts on energy bills or compensation/subsidies for a part of the bill, as in the case of Albania, Italy, Malta, Israel and Turkey. In a majority of cases, the amount of compensation or discount is a fixed amount or percentage applied on a yearly basis, as in Italy, or monthly basis, as in Albania, Israel and Montenegro. In Montenegro, the support is provided in the form of subvention for all vulnerable categories, which consist of a 40% discount for bills up to 60 Euros or a fixed amount of 24 Euros for bills over 60 Euros.

In Italy, the compensation given is categorised into six levels. Such categorisation is based on the estimated additional energy used by medical equipment as well as following the supply contract. The discount can be awarded to consumers who apply for it and is valid for one year. So, by the end of the year, the consumers have to apply again

and show that their conditions of vulnerability persist. Due to COVID-19, the Italian NRA, ARERA, automatically postponed the duration of support and stated that the interested consumers can apply at a later time.

In Egypt, in addition to the regulated prices for certain groups, easier payment plans, conditions and direct support for gas connections cost are also available for these gas consumers.

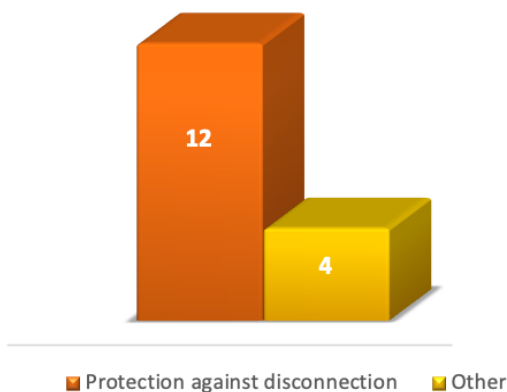
Forms of economic support also exist in the form of exemptions from some components of final energy costs. This may be exemptions from tariffs for the use of DSO-TSO networks, as in the case of Greece, or special/reduced connection fees, as in the case of Palestine.

There are also other types of economic support provided in the form of financial incentives provided to households to promote energy efficiency and financial support to invest in

projects and works contributing to energy efficiency, as in the case of France where, from 2020, support measures are foreseen to cover the costs of thermal renovation work. In addition, French citizens are incentivised to replace their inefficient basic appliances at no cost. In Cyprus, support schemes also exist in the form of financial support for installation of domestic photovoltaic systems or for participating in energy upgrade programmes for housing. Grants and facilities are given also in Jordan for investing in renewable energy by installing solar panel, solar heaters and efficient lamps.

With regard to non-economic support, the most common form among respondent countries that apply non-economic support schemes is the protection from disconnection, as in Albania, Cyprus, Egypt, France, Greece, Italy, Malta, Montenegro, Slovenia, Spain, Palestine and Turkey. In case of France, several warnings are given before disconnection, and disconnection is not an option during winter, from November 1 to March 31. The procedure called emergency supply is also applicable in France, which ensures the continuity of supply by appointing a back-up supplier to replace the defaulting suppliers. This period for warning is 40 days in the case of Greece and 90 days in the case of Israel.

Figure 12. What does non-economic support consist of?



2.6 Coverage of costs for economic support provided to vulnerable consumers

Coverage of costs related to the support of vulnerable consumers is a matter of grave importance in terms of reliability and continuity of support schemes. Regardless of the plans chosen by each country, it is important that each country has rules and plans in place for the estimate of such costs and their coverage.

Different approaches toward coverage of costs of economic support have been reported by the respondent MEDREG countries. Non-economic support also creates some costs which are less significant than those related to economic support, but still count towards this calculation. The majority of the respondent countries report that the costs of economic support provided for vulnerable consumers are covered by the state budget through special governmental funds, as in the case of Albania, Algeria, Egypt, France, Jordan, Lebanon, Malta, Montenegro, Palestine, Israel and Turkey. In case of France and Jordan, other energy consumers cover a part of costs in addition to state budget funds.

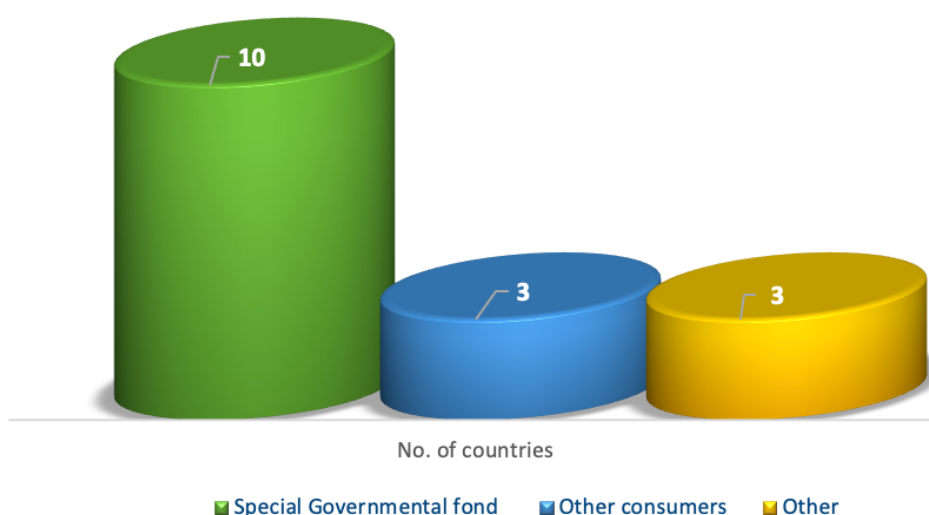


Figure 13. How are the costs of providing economic support to vulnerable consumers covered? Electricity¹.

¹ Not all countries responded to the question.

There are also cases when the costs of support provided to vulnerable consumers are covered by other consumers, as in case of Greece and Italy, by electricity producers, as in the case of Portugal, or by all suppliers, as in case of Spain.

With regard to the coverage of costs for gas, these can be covered by the state budget (Albania, Egypt, France and Spain), partly covered by other means (France and Egypt), and covered by other consumers (Italy and Portugal). However, there is a difference between Italy and Portugal; in the former, the costs are covered only by non-domestic consumers, while in the latter, they are covered by all consumers.

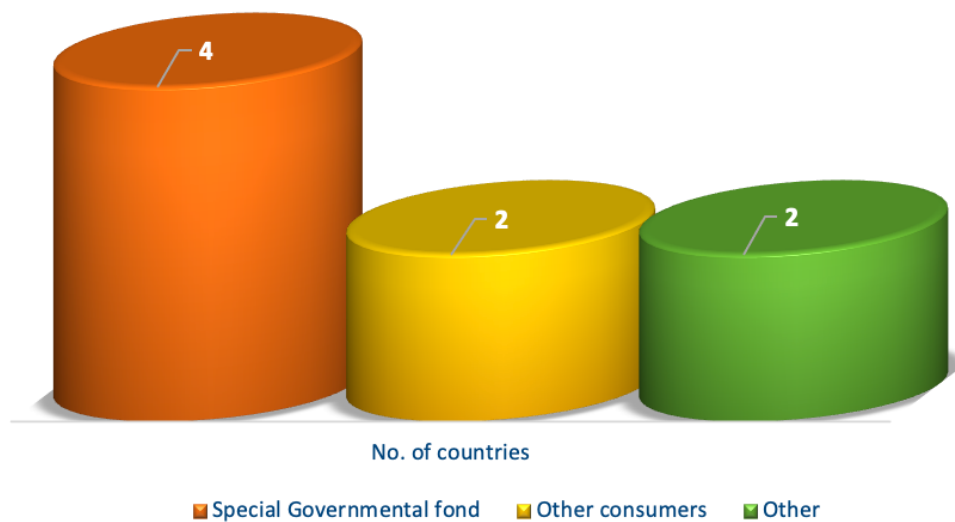


Figure 14. How are the costs of providing economic support to vulnerable consumers covered? Gas¹.

¹ Not all countries responded to the question.

2.7 Correlation between support schemes and season

Vulnerability is more likely to increase in specific weather conditions. Therefore, there are countries that tie support schemes with seasons. This depends on the weather conditions, which may be severe in different countries due to extreme cold or hot weather during a particular season, and is often winter.

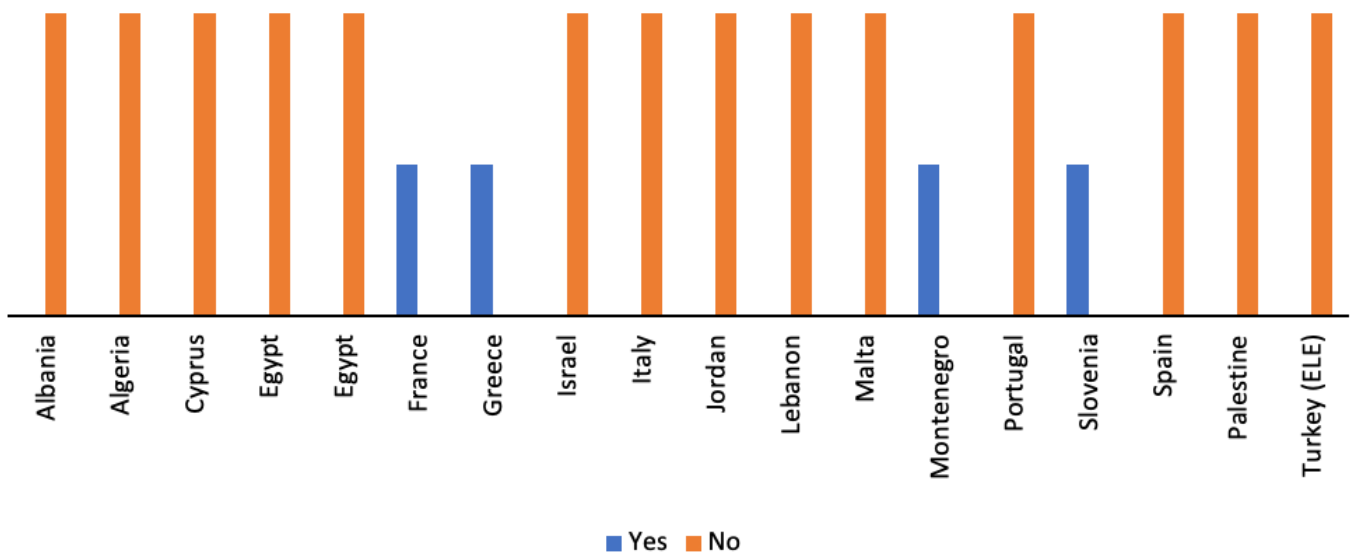


Figure 15. Is the support scheme (economic and non-economic) for vulnerable consumers based on a season (e.g., support during winter for heating purposes)?¹

¹ Not all countries responded to the question.

The majority of respondent report that the support schemes applied in their countries do not relate to a specific season. However, there are cases when the support scheme corresponds to particularly cold or hot weather. In Slovenia, non-economic support scheme is based on the season. In the case of Albania, disconnection is not allowed when temperatures are 15°C. In France, protection from disconnection refers to the winter, starting from November 1 and ending on March 31 as well as extending before and after the winter season. Montenegro prohibits disconnection of electricity and gas from October 1 to the end of April. In the case of Greece, the protection from disconnection of electricity takes place during the cold and hot seasons and to particular periods (November to March and July to August, respectively), while the protection from disconnection of gas applies during the period of November to March.

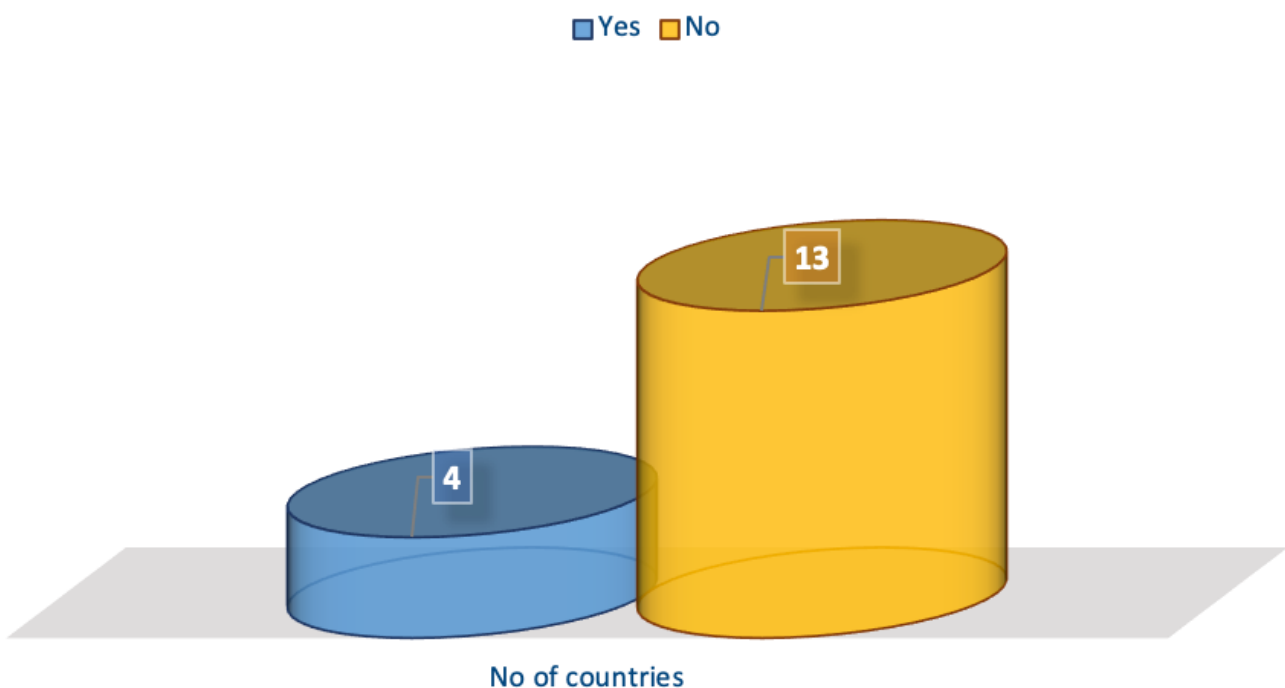


Figure 16. Is the support scheme (economic and non-economic) for vulnerable consumers based on a season (e.g., support during winter for heating purposes¹)?

¹ Not all countries responded to the question.

2.8 Correlation between support schemes and quantity threshold

Support for vulnerability is naturally linked to consumers that consume a moderated amount of energy to fulfil their basic needs. However, there are cases when higher consumption is linked to the use of electrical medical devices or to the size of the household.

There are countries that link their support schemes with size of thresholds, as in the case of Algeria, Egypt, Greece, Jordan, Lebanon, Spain, Israel and Turkey. In the case of Jordan, Israel and Turkey, the monthly threshold is fixed to a certain amount and does not considers additional factors. In case of Greece, there is a variable threshold, 1400–2400 kWh, that considers the number of family members and also people with disabilities. This results in adding 300 kWh per person to the respective thresholds and an additional 600 kWh per person to the respective thresholds that use electricity for medical purposes. In the case of Spain, the threshold is also variable and is set on the basis of the size of the household.

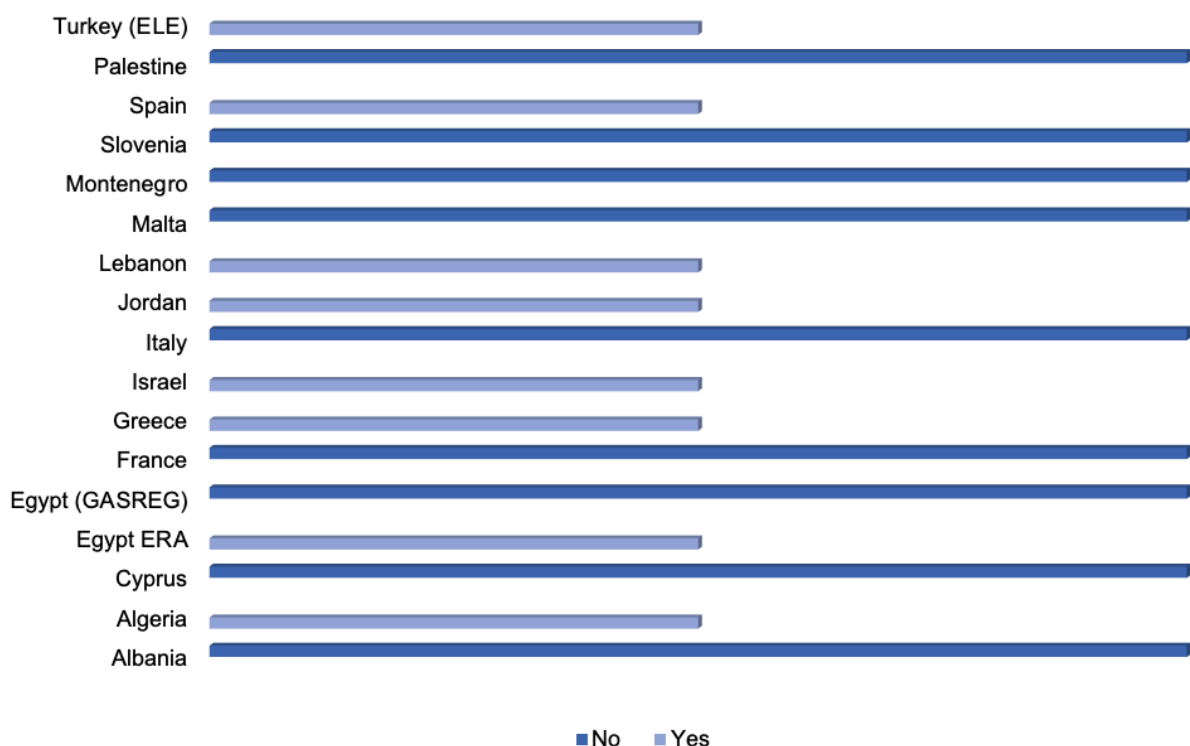


Figure 17. Is the economic and non-economic support scheme for vulnerable consumers based on a quantity threshold (amount of energy)?¹

¹ Not all countries responded to the question.

2.9 Coverage of support schemes for vulnerable consumers

These statistics help to understand the effectiveness and adequacy of support schemes for vulnerable consumers. One of the questions in the questionnaire sent to the MEDREG members, requiring information on the percentage of the households qualifying for and receiving economic support, was designed to provide clarity into the estimated and real effects of economic support that is planned or provided to vulnerable consumers.

It is apparent from the answers that the respondent countries have no updated information in this respect. In many cases, the

provided information refers to 2018, almost two years ago. With regard to the economic support for electricity, the percentages reported by the respondent countries vary from 3.75% (Spain), 4.55% (Cyprus), 5.56% (Montenegro), 7.14% (Greece), 9.48% (Malta), 20% (Albania) and 30% (Israel) to 97.6% (Egypt) and 100% (Lebanon). Only in rare cases (such as Jordan and Algeria) is disaggregated information on the percentage of consumers that qualify for economic support against the percentage of those receiving economic support provided.

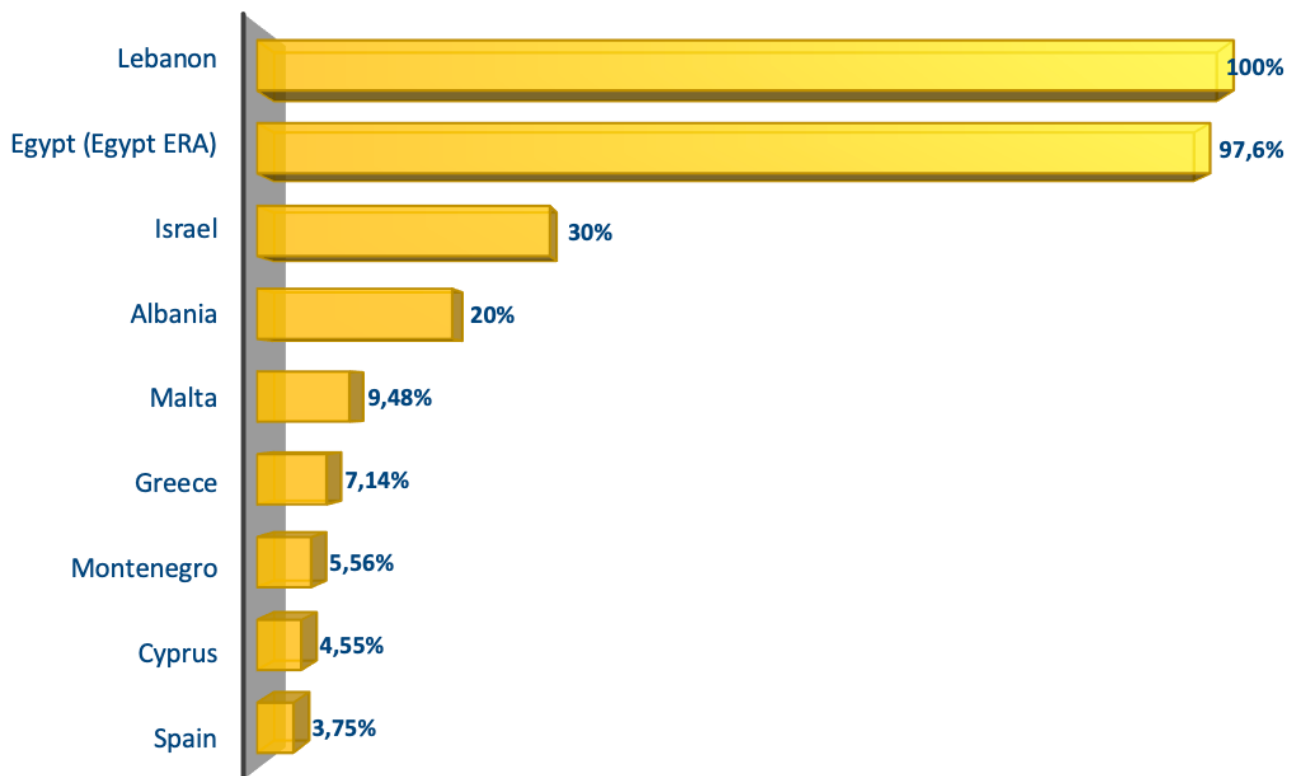


Figure 18. Percentages as per countries response¹.

¹ Not all countries responded to the question.

Little information on the percentage of households qualifying for and receiving economic support was provided for gas. It seems that there are no economic support schemes among the respondent MEDREG countries that have a gas market. Exceptions for the same include Italy, which reports a percentage of 35% of the households meeting the relevant requirements, Portugal, reporting 35,624 consumers in the fourth trimester of 2019, and Spain, where the heating check is applied to consumers registered as beneficiaries of the social electricity tariff (1,050,000 customers). This aid applies to all vulnerable customers, independent of the energy that they use for heating (electricity, gas, fuel, etc.).

2.10 Best practices identified in national practices

Best practices guide countries towards transparent, effective and even innovative solutions and mechanisms for identification and provision of support for vulnerable consumers. As there are different drivers of vulnerability in different countries, the approaches towards vulnerable consumers protection are also different. However, it is interesting to see how countries perceive the practices applied in their countries as successful, and to see their efforts in working towards identifying and formulating good practices for their country. Identifying this is vital as there are countries that have learnt from best practices in international practice or have learnt and reflected upon lessons learnt from their past practices.

In this respect, Albania considered the reduction of the tariff as a bad option, as gives bad signals to consumers. Instead, a direct subsidy was seen as more feasible. However, they are working on establishing a new scheme for the protection of vulnerable consumers on the basis of average monthly consumption of households. The Government of Albania is involved in this regard along with the regulatory authority, ministries responsible for health and social protection and energy distribution companies. Likewise, in the case of Egypt, the direct subsidy of vulnerable consumers is seen as more adequate than a price reduction.

In the case of Algeria, concern surrounding the lack of a definition for the concept of vulnerable

consumer and the need to work on setting relevant criteria on the basis of, and in addition to, existing ones has been recognised as an issue. Jordan is also working on best practices for their country's conditions.

Since 2018, France has applied the energy voucher for electricity (TPN) and gas (TSS). This instrument is perceived as effective in terms of simplifying the procedures for beneficiaries as they are granted automatically to households meeting the rigid and flexible criteria of income and composition. The voucher can be used to pay energy bills, but also to pay for energy efficiency related works. Similarly, Italy will apply an automatic access procedure starting from January 1, 2021, as it becomes aware of the fact that a lower number of vulnerable consumers applied for vulnerable protection measures, while the number of vulnerable consumers was much higher. ARERA has been charged to set the procedures and regulate the information flow among involved entities, ensuring that the system will operate effectively by its planned launch date. Automatic recognition mechanisms are found in Portugal, but for gaining access to social tariffs. In this case, different stakeholders, such as General Directory of Energy and Geology, tax authorities, social security institutions and electricity suppliers, interact to identify and develop a list of eligible beneficiaries. These beneficiaries also have the right to appeal the support granted, if found to be unsatisfactory.

In the case of Montenegro, protection from disconnection is considered a best practice. The same is considered in Malta. Here, the reschedule of payments is also explored as an option, even in cases where consumers have already benefited from other support schemes for vulnerable consumers.

In Slovenia, as a fast reaction due to the COVID-19 pandemic, the government and the regulator adopted measures that suspend certain supplier charges in relation to vulnerable consumers. This includes capacity charges (regulator) and charges for the support of high-efficiency cogeneration and renewable energy (government). Both measures were valid for three months (March–June, 2020) and directly benefited vulnerable consumers, with the aim to reduce energy bills by 27% during the period.

In the case of Spain, the instrument of heating check was identified as a best practice. This was

paid directly to the beneficiary and consisted of a single payment made on annual basis. It varied depending on the degree of the vulnerability of the consumer and the climate zone they reside in. In the case of Israel, the variable tariff system is applied by targeting consumers with low income. The support for consumer lying outside of organisational plans is foreseen and reported as another best practice.

3

CONCLUSION AND RECOMMENDATIONS

3

CONCLUSION AND RECOMMENDATIONS

The feedback received from the respondent countries shows differences in the ways different countries approach the vulnerability of energy consumers. However, all respondent countries have adopted protection measures addressing the needs of such customers. The criteria of vulnerability are set on the basis of similar drivers of vulnerability linked to old age, health and disability, low income and living in remote areas, regardless of formulation of protection products or beneficiaries.

The differences predominantly lie in the way different countries approach the vulnerable consumers in terms of adequacy and coverage of protection measures. Efficacy of support measures depends on the methods used for identification and mechanisms for granting the support, which should always be based on the principles of fairness, transparency and accountability.

In comparison, slight improvements have been noticed as compared to the situation captured in the report of 2016. Such a statement is valid in terms of change in the overall situation across

MEDREG countries. On the other hand, the improvements made in France, Italy and Portugal with respect to the automatic recognition of vulnerable consumers are significant and these best practices can be replicated in other MEDREG countries.

Also taking into consideration the new challenges the energy markets are facing due to COVID-19, it is important to pay attention to the flexibility of the system protecting vulnerable consumers, which should respond to the needs of existing vulnerable consumers, permanent or temporary, but also to the needs of new or future consumers. It seems that needs of electricity consumers are better identified and addressed compared to the gas consumers, albeit not in terms of numbers, but in terms of policies and measures in place.

The overview of the situation across MEDREG members suggests that there is a need for improvement, especially in terms of the interaction between different institutions, adequate identification of consumers, including those unable to apply for support, and sufficient coverage with responsive support measures.

ANNEX 1

LIST OF ABBREVIATIONS

Term	Definition
MEDREG	Mediterranean Energy Regulators
NRA	National Regulatory Authority
GGP	Guidelines of Good Practice
TSO	Transmission System Operator
DSO	Distribution System Operator
kWh	Kilowatt hour

ANNEX 2

DATA COLLECTED BY RESPONDENT MEDREG COUNTRIES TO QUESTIONNAIRES

Table 1: MEDREG country members report on situation of vulnerable consumers

1.

Country	Albania	Received filled questionnaire	✓	Responsible institution	ERE
Main data on vulnerable consumers					
<ol style="list-style-type: none"> 1. Definition for vulnerable consumer – Yes. 2. Specific definition vs general definition – Specific for electricity and gas usage 3. Source of definition – Laws <ul style="list-style-type: none"> •Law on power sector •Law on gas sector 4. Separate definition for electricity usage and gas usage vs general – Separate definitions for electricity usage and gas usage 5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes 6. Level of the regulation where the criteria are set – Laws on energy and gas 7. Specific support schemes within the energy sector: <ul style="list-style-type: none"> •Electricity sector – Yes •Gas sector – No 8. Consumer categories benefiting within the energy sector: <ul style="list-style-type: none"> •For electricity – <ul style="list-style-type: none"> •Families where the head is a pensioner •Paraplegic and tetraplegic invalids, as well as people with disabilities •Low-income citizens with monthly incomes less than 35,000 ALL (approximately 280 Euro). •For gas – No 9. Type of economic support within the energy sector: <ul style="list-style-type: none"> •For electricity – Specific regulated price for certain consumer groups •For gas – No 10. Types of non-economic support applied – Protection against disconnection 11. Specific support schemes from social welfare system: <ul style="list-style-type: none"> •With respect to energy sector – Yes •General – No 12. Definition for “energy poverty” – No 13. How the costs of economic support are covered: <ul style="list-style-type: none"> •For electricity – State budgeted, special governmental fund •For gas – N/A¹ 					

¹ N/A refers to Not Available.

14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 20% (not disaggregated)
 - For gas – N/A
15. Categories of consumers receiving non-economic support – Vulnerable consumers
16. Do the support schemes refer to seasons – No
17. Do the support schemes refer to quantity threshold – No
18. Best practice on vulnerable consumers protection – A new scheme based on average monthly consumption of the household in the process of being developed

2.

Country	Algeria	Received filled questionnaire ✓	Responsible institution	CREG
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – No
2. Specific definition vs general definition –N/A
3. Source of definition – N/A
4. Separate definition for electricity usage and gas usage vs general – N/A.
5. Existing criteria for obtaining the status of “vulnerable consumer” – N/A
6. Specific support schemes within the energy sector:
 - Electricity sector – No
 - Gas sector – No
7. Consumer categories benefiting within the energy sector:
 - For electricity – Household consumers, residents of isolated areas, southern areas
 - For gas – Household consumers, residents of isolated areas, southern areas.
8. Type of support within the energy sector: Economic and non-economic
9. Types of economic support:
 - For electricity – Not answered.
 - For gas – Not answered.
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – Yes
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - For electricity – State budget
 - For gas – State budget
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – Not answered
 - For gas – Not answered
15. Categories of consumers receiving non-economic support: Not answered.
16. Types of non-economic support applied – Protection from disconnection
17. Do the support schemes refer to seasons – No

18. Do the support schemes refer to quantity threshold – Yes
19. Best practice on vulnerable consumers protection – Not answered

3.

Country	Bosnia-Herzegovina	Received filled questionnaire	Responsible institution	SERC
Main data on vulnerable consumers				

4.

Countr	Croatia	Received filled questionnaire	Responsible institution	HERA
Main data on vulnerable consumers				

5.

Country	Cyprus	Received filled questionnaire ✓	Responsible institution	CERA
Main data on vulnerable consumers				

1. Definition for vulnerable consumer – Yes.
2. Specific definition vs general definition – Specific
3. Source of definition – Law
4. Separate definition for electricity usage and gas usage vs general – Specific
5. Existing criteria for obtaining the status of “vulnerable consumer”
– Yes, economic, health, age, remote areas
6. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – No gas market
7. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers benefiting from social schemes, consumers with health problems, elderly
8. Type of support within the energy sector: Economic and non-economic
9. Types of economic support:
 - For electricity- Specific Tariff for special groups
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – Not answered
 - General – Not answered
12. Definition for “energy poverty” – Yes
13. How the costs of economic support are covered:
 - For electricity – Other consumers
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 4.55% (2018)

15. Categories of consumers receiving non-economic support
– Same category receiving the economic support
16. Types of non-economic support applied – Protection from disconnection
17. Do the support schemes refer to seasons – No
18. Do the support schemes refer to quantity threshold – Yes
19. Best practice on vulnerable consumers protection – Not answered

6.

Country	Egypt	Received filled questionnaire ✓	Responsible institution	Egypt Era
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – No
2. Specific definition vs general definition –N/A
3. Source of definition – N/A
4. Separate definition for electricity usage and gas usage vs general – N/A
5. Existing criteria for obtaining the status of “vulnerable consumer” – N/A
6. Specific support schemes within the energy sector:
 - Electricity sector – Yes, economic support
 - Gas sector – Yes
7. Consumer categories benefiting within the energy sector:
 - For electricity – Household and agricultural consumers consuming less than 650 kWh
8. Type of support within the energy sector: Economic and non-economic
9. Types of economic support:
 - For electricity- Specific tariff
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – Yes
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - For electricity – State budget
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 97.6% (not disaggregated)
15. Categories of consumers receiving non-economic support – Same as those receiving economic support
16. Types of non-economic support applied – Protection from disconnection
17. Do the support schemes refer to seasons – No
18. Do the support schemes refer to quantity threshold – No
19. Best practice on vulnerable consumers protection – Not answered

Country	Egypt	Received filled questionnaire ✓	Responsible institution	GASREG
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – No
2. Specific definition vs general definition – N/A
3. Source of definition – N/A
4. Separate definition for electricity usage and gas usage vs general – N/A
5. Existing criteria for obtaining the status of “vulnerable consumer” – N/A
6. Specific support schemes within the energy sector:
 - Gas sector – Yes
7. Consumer categories benefiting within the energy sector:
 - Currently there is no customer categories receiving economic support within gas sector
8. Type of support within the energy sector: Economic
9. Types of economic support:
 - Specific tariff
10. Types of non-economic support applied – There is no economic support for these kind of consumers in gas sector
11. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – Yes
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - State budget and cross subsidy
14. Percentage of households qualifying for/receiving economic support:
 - There is no economic support for these kind of consumers in gas sector
15. Categories of consumers receiving non-economic support – There is no economic support for these kind of consumers in gas sector
16. Types of non-economic support applied – No
17. Do the support schemes refer to seasons – No
18. Do the support schemes refer to quantity threshold – No
19. Best practice on vulnerable consumers protection – Yes

7.

Country	France	Received filled questionnaire ✓	Responsible institution	CRE
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – General
3. Source of definition – Consumer Code
4. Separate definition for electricity usage and gas usage vs general – General

5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes, economic, age and health conditions of the consumers
6. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – Yes
7. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers in difficult health and/or economic situation
 - For gas – Consumers in difficult health and/or economic situation (household supply and centralised heating)
8. Type of support within the energy sector: Economic and non-economic
9. Types of economic support:
 - For electricity – Energy voucher
 - For gas – Energy voucher
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – Not answered
 - General – Not answered
12. Definition for “energy poverty” – Yes
13. How the costs of economic support are covered:
 - For electricity – State budget and other consumers
 - For gas – State budget and other consumers
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 14% in 2018 (not disaggregated)
 - For gas – 35% in 2018 (not disaggregated)
15. Categories of consumers receiving non-economic support – It depends on the support
16. Types of non-economic support applied – Protection from disconnection
17. Do the support schemes refer to seasons – Yes
18. Do the support schemes refer to quantity threshold – No
 - Best practice on vulnerable consumers protection – Automatic recognition of vulnerable consumers and use of energy voucher

8.

Country	Greece	Received filled questionnaire ✓	Responsible institution	RAE
Main data on vulnerable consumers				

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – General
3. Source of definition – Law
4. Separate definition for electricity usage and gas usage vs general – General
5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes, income, age + 70, value of property and health criteria

6. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – Yes
7. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers with low income and low value of property, consumer at age 70+, customers in need for mechanical support, consumers with health issues
 - For gas – Non-economic support is provided to consumers with low income and low value of property, consumer at age 70+, customers in need for mechanical support, consumers with health issues
8. Type of support within the energy sector – Economic and non-economic
9. Types of economic support:
 - For electricity – specific regulated prices
 - For gas – N/A
10. Types of non-economic support applied – Protection against disconnection as well as better debt settlement conditions. Vulnerable consumers are served by priority by the suppliers' customer services
11. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – Yes
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - For electricity –other consumers
 - For gas –N/A
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 7.14% in 2019 (not disaggregated)
 - For gas – N/A
15. Categories of consumers receiving non-economic support – Consumers with low income and low value of property, consumer at age 70+, customers in need for mechanical support, consumers with health issues
16. Do the support schemes refer to seasons – Yes, both for gas and electricity
17. Do the support schemes refer to quantity threshold – Yes, for electricity only

9.

Country	Israel	Received filled questionnaire	✓	Responsible institution	PUA
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – Specific for electricity usage
 - Source of definition – Standards set by Authority
3. Existing criteria for obtaining the status of “vulnerable consumer” – Yes
4. Level of the regulation where the criteria are set – Standards set by Authority
5. Specific support schemes within the energy sector:
 - Electricity sector – Yes
6. Consumer categories benefiting within the energy sector:
 - For electricity –
 - Holocaust survivors
 - Recipients of old-age benefits, etc.

7. Type of economic support within the energy sector:
 - For electricity – Specific tariff for certain consumers
8. Types of non-economic support applied – Warning before disconnection
9. Specific support schemes from social welfare system:
 - With respect to energy sector – Yes
 - General – Yes
10. Definition for “energy poverty” – No
11. How the costs of economic support are covered:
 - For electricity – State budget, special governmental fund
12. Percentage of households qualifying for/receiving economic support:
 - For electricity – 11.2% (not disaggregated)
13. Do the support schemes refer to seasons – No
14. Do the support schemes refer to quantity threshold – Yes

10.

Country

Italy

Received filled
questionnaire ✓

Responsible
institution

ARERA

Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition –General
3. Source of definition – Law
4. Separate definition for electricity usage and gas usage vs general – Separate definitions
5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes, economic and health conditions of the consumers
6. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – Yes
7. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers in difficult health and/or economic situation
 - For gas – Consumers in difficult health and/or economic situation (household supply and centralised heating)
8. Type of support within the energy sector: Economic and non-economic
9. Types of economic support:
 - For electricity – Other, discount in energy bills
 - For gas – Other, yearly discount
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – Not answered
 - General – Not answered
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - For electricity – Other consumers
 - For gas – Non-domestic consumers

14. Percentage of households qualifying for/receiving economic support:

- For electricity – 35% in 2018 (not disaggregated)
- For gas – 35% in 2018 (not disaggregated)

15. Categories of consumers receiving non-economic support – Consumers who need electro-medical powered equipment's and important public service activities like hospitals, schools, prisons

16. Types of non-economic support applied – Protection from disconnection

17. Do the support schemes refer to seasons – No

18. Do the support schemes refer to quantity threshold – No

19. Best practice on vulnerable consumers protection – Starting from 1 January, 2021, the “bonus” benefit must be automatically recognised to entitled consumers, without the need, for them, to present a specific application for admission or renewal, as is the case today. ARERA has been charged to set the procedures and regulate the information flows among all involved entities in order to ensure that the new system will be efficiently working by the fixed deadline.

11.

Country

Jordan

Received filled
questionnaire

✓

Responsible
institution

EMRC

Main data on vulnerable consumers

1. Definition for vulnerable consumer – No

2. Specific definition vs general definition – N/A

- Source of definition – N/A

3. Separate definition for electricity usage and gas usage vs general – N/A

4. Existing criteria for obtaining the status of “vulnerable consumer” – No definition but generally refers to a household consuming below 300 kwh/month, small-medium enterprises with effect in economy and agriculture

5. Specific support schemes within the energy sector:

- Electricity sector – Yes
- Gas sector – No

6. Consumer categories benefiting within the energy sector:

- For electricity –
- Household consuming less than 300 kwh
- Small industry
- Medium industry
- Agriculture
- For gas – N/A

7. Type of support within the energy sector:

- For electricity – Economic support
- For gas – No

8. Types of economic support:

- For electricity
- Specific tariff for certain consumer groups
- Grants and facilities for installing renewable energy (solar panel, solar heater, efficiency lamp) mostly for household consumers
- For gas – No

9. Types of non-economic support applied – No
10. Specific support schemes from social welfare system:
 - With respect to energy sector – Yes
 - General – No
11. Definition for “energy poverty” – No
12. How the costs of economic support are covered:
 - For electricity – State budget, special government fund mainly for some sectors
 - For gas – N/A
13. Percentage of households qualifying for/receiving economic support:
 - For electricity – N/A
 - For gas – N/A
14. Categories of consumers receiving non-economic support
 - Household consuming less than 500 kwh
 - Small industry
 - Medium industry
 - Agriculture
15. Types of non-economic support applied – N/A
16. Do the support schemes refer to seasons – No
17. Do the support schemes refer to quantity threshold – Yes, households consuming below 300 kwh/month
18. Best practice on vulnerable consumers protection – No best practice yet, but working to refer to best practices

12.

Country	Lebanon	Received filled questionnaire	✓	Responsible institution	LCEC
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – No
2. Specific definition vs general definition – N/A
3. Source of definition – N/A
4. Separate definition for electricity usage and gas usage vs general – N/A
5. Existing criteria for obtaining the status of “vulnerable consumer” – N/A
6. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – Not answered
7. Consumer categories benefiting within the energy sector:
 - For electricity, for low tension:
 - Lightning
 - Streets, public establishments, free medical care centres, hospitals, mosques and churches, cinemas, charity groups, hotels
 - Industry, craftsmen, agriculture, water treatment, pumping stations
 - For gas – N/A
8. Type of support within the energy sector: Economic and non-economic

9. Types of economic support:
 - For electricity – Special for certain consumer groups:
 - For gas – Not answered
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – Yes
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - For electricity – State budget, through EDL
 - For gas – N/A
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 100%
 - For gas – N/A
15. Categories of consumers receiving non-economic support – None
16. Types of non-economic support applied – N/A
17. Do the support schemes refer to seasons – No
18. Do the support schemes refer to quantity threshold – Yes, the higher the consumption, lower the support
19. Best practice on vulnerable consumers protection – Not answered

13.

Country	Lybia	Received filled questionnaire	Responsible institution	ME
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Main data on vulnerable consumers

14.

Country	Malta	Received filled questionnaire ✓	Responsible institution	REWS
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – Specific
3. Source of definition – Government act
4. Separate definition for electricity usage and gas usage vs general – Separate definitions
5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes, vulnerable consumers:
 - Consumers part of social schemes such as social assistance, unemployment, pension
 - Consumers with low incomes
6. Specific support schemes within the energy sector:
 - Electricity sector – No
 - Gas sector – No
7. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers benefiting from:
 - Social assistance
 - Unemployment benefit

- Age pension
- Care pension
- Families with incomes less than 8.795 Euro
- Consumers benefiting on humanitarian ground
- For gas – N/A

8. Type of support within the energy sector: Economic and non-economic

9. Types of economic support:

- For electricity – Discount on electricity bills
- An amount to offset 30% of the consumption of electricity prior to the eco reduction up to a maximum assistance of 75 Euro per year per person in the household
- If claimant or spouse are the account holder, they are entitled to a subsidy of not more than €65 per year in respect of the rent of the electricity meter, and a subsidy of not more than 59 Euro per year in respect of the rent of the water meter
- For gas –
- A person who is over 60 years of age and is in receipt of an Energy Benefit will also be awarded 40 Euro annually as a Gas Rebate per household, payable only with actual bills
- A person who is under 60 years of age and is in receipt of an Energy Benefit will be awarded 30 Euro as a Gas Rebate annually per household

10. Types of non-economic support applied – Protection against disconnection

11. Specific support schemes from social welfare system:

- With respect to energy sector – Yes
- General – Not answered

12. Definition for “energy poverty” – No

13. How the costs of economic support are covered:

- For electricity – State budget, special government fund
- For gas – N/A

14. Percentage of households qualifying for/receiving economic support:

- For electricity – 23,638 consumers or 9.48 % in 2018 (not disaggregated)
- For gas – N/A

15. Categories of consumers receiving non-economic support – All consumers

16. Types of non-economic support applied – Protection from disconnection

17. Do the support schemes refer to seasons – No

18. Do the support schemes refer to quantity threshold – No

19. Best practice on vulnerable consumers protection – Vulnerable consumers who are unable to pay their bills even with the receipt of the energy benefit are further aided by the supplier to automatically re-schedule their payments and to pay by instalment tailored to their situation. Moreover, in such cases disconnection is almost never resorted to, with the last resort measures used including the limiting of consumption capacity through the smart metering system.

15.

Country	Montenegro	Received filled questionnaire ✓	Responsible institution	REGAGEN
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – General definition
 - Source of definition – Law on Energy

3. Separate definition for electricity usage and gas usage vs general – Separate definitions
4. Existing criteria for obtaining the status of “vulnerable consumer” – Yes, vulnerable consumers who need health and social care:
 - Disabled persons, persons with special needs and persons of poor health condition, who may be exposed to a threat to life or health as a result of a limitation or suspension of energy supply
 - Persons who need social care as determined by the state authority competent for social care affairs
5. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – No
6. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers being covered by one of the following social benefits:
 - Solidarity supplement for the elderly
 - Social income
 - Unemployment benefit
 - Family allowance
 - Disability pension
 - Old age retirees
 - Low voltage consumers with annual incomes less than 5,808 Euro plus 50% for each extra household not receiving any income for up to 10 persons
 - For gas – Consumers being covered by one of the following social benefits:
 - Solidarity supplement for the elderly
 - Social income
 - Unemployment benefit
 - Family allowance
 - Disability pension
7. Type of support within the energy sector:
 - For electricity – Economic and non-economic support
 - For gas – No
8. Types of economic support:
 - For electricity – Households (0,4 kV), subventions for all categories in danger covering 40% for the bills up to 60 Euro and beyond that a fixed subvention of 24 Euro
 - For gas – No
 - Types of non-economic support applied – Protection against disconnection (Suspension of electricity or gas supply shall be prohibited from the beginning of October until the end of April regardless of potential unsettled liabilities on the basis of consumed electricity or gas to vulnerable consumers which need health and social care, i.e., households with disabled persons, persons with special needs and persons of poor health condition, who may be exposed to a threat to life or health as a result of a limitation or suspension of energy supply, and persons who need social care as determined by the state authority competent for social care affairs. Suspension of supply shall be prohibited to vulnerable consumers which are socially handicapped, i.e., households with persons who need a social care defined by competent public institution).
9. Specific support schemes from social welfare system:
 - With respect to energy sector – Not answered
 - General – Not answered
10. Definition for “energy poverty” – No
11. How the costs of economic support are covered:
 - For electricity – State budget, special government fund
 - For gas – N/A
12. Percentage of households qualifying for/receiving economic support:
 - For electricity – 5.56 % (not disaggregated)
 - For gas – N/A
13. Categories of consumers receiving non-economic support – Vulnerable consumers with health conditions

14. Types of non-economic support applied – Protection from disconnection
15. Do the support schemes refer to seasons – Yes, October–April
16. Do the support schemes refer to quantity threshold – No
17. Best practice on vulnerable consumers protection – Protection from disconnection

16.

Country	Morocco	Received filled questionnaire	Responsible institution	ANRE
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Main data on vulnerable consumers

17.

Country	Palestine	Received filled questionnaire ✓	Responsible institution	PERC
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – General definition
3. Source of definition – Law on electricity
4. Separate definition for electricity usage and gas usage vs general – General
5. Existing criteria for obtaining the status of “vulnerable consumer” – N/A
6. Level of the regulation where the criteria are set – N/A
7. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – No
8. Consumer categories benefiting within the energy sector:
 - For electricity –
 - Consumers outside the structural or organised plans
 - Consumers living in severe conditions
 - Consumers with social and health conditions
 - Consumers living in particular hot areas.
 - For gas – No
9. Type of support within the energy sector:
 - For electricity – Economic and non-economic support
 - For gas – N/A
10. Types of economic support:
 - For electricity –
 - Specific regulated prices, specific tariff for each category of vulnerable consumers as well as special connection fees.
 - Financial and technical support for persons in need.
 - For gas – N/A
11. Types of non-economic support applied – Protection against disconnection

12. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – No
13. Definition for “energy poverty” – Not answered
14. How the costs of economic support are covered:
 - For electricity – State budget, special governmental fund
 - For gas – N/A
15. Percentage of households qualifying for/receiving economic support:
 - For electricity – 30% (not disaggregated)
 - For gas – N/A
16. Categories of consumers receiving non-economic support – Vulnerable consumers of all categories
17. Types of non-economic support applied – Protection against disconnection
18. Do the support schemes refer to seasons – No
19. Do the support schemes refer to quantity threshold – No
20. Best practice on vulnerable consumers protection – Intervariable tariff system according to the amount of consumption for consumers within the special nature such as hot regions, so that the first 3 categories are less than the source tariff, which in turn helping with lowering their tariffs and helping consumers with limited income. Supporting subscribers outside the organisational plans who need a large electrical network for their access to electricity either by achieving the principle of interdependence and setting unified connection fees for all and by supporting energy distributors projects in those areas.

18.

Country	Potugal	Received filled questionnaire ✓	Responsible institution	ERSE
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – Specific for electricity usage and gas usage
3. Source of definition – Law
 - Law on electricity sector.
 - Law on gas sector.
4. Separate definition for electricity usage and gas usage vs general – Separate definitions
 - Existing criteria for obtaining the status of “vulnerable consumer” – Yes, economic criteria, consumers that are part of social schemes and benefit from social aid
 - Additional criteria for applying social tariff for electricity –
 - To be holder of electricity supply contract
 - The consumption must be exclusively for consumption use in a permanent housing
 - The installation should be connected in low-voltage, with contracted power up to 6,9 kVA
5. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – Yes
6. Consumer categories benefiting within the energy sector:
 - For electricity – Consumers being covered by one of the following social benefits:
 - Solidarity supplement for the elderly
 - Social income
 - Family allowance
 - Disability pension

- Old age retirees
- Low voltage consumers with annual incomes less than 5,808 Euro plus 50% for each extra household not receiving any income for up to 10 persons
- For gas – Consumers being covered by one of the following social benefits:
- Solidarity supplement for the elderly
- Social income
- Unemployment benefit
- Family allowance
- Disability pension

7. Type of support within the energy sector:

- For electricity – Economic support
- For gas – Economic support

8. Types of economic support:

- For electricity – Specific tariff for certain consumer group
- For gas – Specific tariff for certain consumer group

9. Types of non-economic support applied – Protection against disconnection

10. Specific support schemes from social welfare system:

- With respect to energy sector – No
- General – No

11. Definition for “energy poverty” – No.

12. How the costs of economic support are covered:

- For electricity – Electricity producers
- For gas – Other consumers

13. Percentage of households qualifying for/receiving economic support:

- For electricity – 797,879 in the fourth trimester of 2019 (not in percentage and not disaggregated)
- For gas – 35,624 in the fourth trimester of 2019

14. Categories of consumers receiving non-economic support – N/A

15. Types of non-economic support applied – N/A

16. Do the support schemes refer to seasons – No

17. Do the support schemes refer to quantity threshold – Not answered

18. Best practice on vulnerable consumers protection – The access to the social tariff benefit is achieved through an automatic recognition mechanism.

The list of beneficiaries is elaborated by the General Direction of Energy and Geology (DGEG) based on data consumers connected to the grid with a supply contract and after the verification of the eligibility conditions of consumers with the Tax Authority and the Social Security.

To the final consumers entitled to the social tariff will be sent a communication stating that they have been granted the right to the benefit. If the costumers do not agree with this assignment, they may object within 30 days. If the costumer does not say anything, the right to the social tariff is assigned.

Alternatively, the beneficiary may also request from the competent social security institutions and from the Tax Authority a proof of the status as beneficiary and submit it to the electricity supplier.

The maintenance of the social tariff depends on the confirmation by the General Direction of Energy and Geology (DGEG), in September of each year, of the condition of an economically vulnerable final consumer.

The beneficiary who fails to meet the social tariff allocation requirements must inform the competent social security institution within 30 days.

19.

Country	Slovenia	Received filled questionnaire	Responsible institution	AGEN-RS
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – Specific for electricity and gas usage
3. Source of definition – Law
 - Energy Act
4. Separate definition for electricity usage and gas usage vs general – Separate definitions for electricity and gas usage
5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes
6. Level of the regulation where the criteria are set – Energy Act
7. Specific support schemes within the energy sector:
 - Electricity sector – No
 - Gas sector – No
8. Type of support within the energy sector:
 - For electricity – Non-economic support
 - For gas – Non-economic support
9. Types of non-economic support applied – Protection against disconnection.
10. Specific support schemes from social welfare system:
 - With respect to energy sector – No
11. Definition for “energy poverty” – No
12. Categories of consumers receiving non-economic support – Vulnerable consumers of electricity and gas.
13. Best practice on vulnerable consumers protection – Not answered

20.

Country	Spain	Received filled questionnaire ✓	Responsible institution	CNMC
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Main data on vulnerable consumers

1. Definition for vulnerable consumer – Yes
2. Specific definition vs general definition – Specific for electricity usage
3. Source of definition – Law
 - Law on power sector
4. Separate definition for electricity usage and gas usage vs general – Separate definitions for electricity usage
5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes
6. Level of the regulation where the criteria are set – Law on energy
7. Specific support schemes within the energy sector:
 - Electricity sector – Yes
 - Gas sector – No

8. Consumer categories benefiting within the energy sector:
 - For electricity –
 - Families with low overall annual incomes
 - Big families with three or more children
 - Retirees with low pensions
 - For gas – No
9. Type of support within the energy sector:
 - For electricity – Economic and non-economic support
 - For gas – Economic and non-economic support
10. Types of economic support:
 - For electricity – Specific regulated prices, social electricity tariff which is 25–40% less than the regular tariff, depending on the degree of vulnerability as per income levels
 - For gas – Single payment in the forms of heating check, 25–124 Euro per year, depending on degree of vulnerability and climate zone
11. Types of non-economic support applied – Protection against disconnection
12. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – No
13. Definition for “energy poverty” – Yes, the same definition as for the “vulnerable consumers”
14. How the costs of economic support are covered:
 - For electricity – All suppliers
 - For gas – State budget, special government fund
15. Percentage of households qualifying for/receiving economic support:
 - For electricity – 3.75% of total electricity consumers (data from end 2018) (not disaggregated)
 - For gas – 1,050,000 consumers, the same group benefiting from electricity economic support
16. Categories of consumers receiving non-economic support – Vulnerable consumers of electricity and gas
Types of non-economic support applied – Protection against disconnection
17. Do the support schemes refer to seasons – Yes, heating check for gas usage
18. Do the support schemes refer to quantity threshold – Yes, for electricity, 115–345 kWh/month, depending on the size of the family
19. Best practice on vulnerable consumers protection – Starting from 2019, through the social budget was granted a single payment of heating check between 25-124 euro, paid to the consumer bank account.

21.

Country

Tunisia

Received filled
questionnaire

Responsible
institution

MIT

Main data on vulnerable consumers

22.

Country

Turkey

Received filled
questionnaire ✓

Responsible
institution

EMRA

Main data on vulnerable consumers

1. Definition for vulnerable consumer – No
2. Specific definition vs general definition – N/A
3. Source of definition – N/A
4. Separate definition for electricity usage and gas usage vs general – N/A

5. Existing criteria for obtaining the status of “vulnerable consumer” – Yes
6. Specific support schemes within the energy sector:
 - Electricity sector – No
 - Gas sector – No
7. Consumer categories benefiting within the energy sector:
 - For electricity – Yes
 - Veterans and families of martyrs and veterans
 - Monthly 150 kWh electricity support from the Ministry of Family, Labour and Social Services
 - For gas – No
8. Type of support within the energy sector:
 - For electricity – Yes
 - For gas – No
9. Types of economic support:
 - For electricity – Specific regulated prices for veterans and families of martyrs and veterans benefit from subsidised electricity tariff
 - For gas – No
10. Types of non-economic support applied – Protection against disconnection
11. Specific support schemes from social welfare system:
 - With respect to energy sector – No
 - General – Yes, health insurance, student support, low income, disabled, unemployed
12. Definition for “energy poverty” – No
13. How the costs of economic support are covered:
 - For electricity – State budget, special governmental fund
 - For gas – N/A
14. Percentage of households qualifying for/receiving economic support:
 - For electricity – 4% qualify and receive the monthly 150 kWh electricity support (2020)
 - For gas – N/A
15. Categories of consumers receiving non-economic support – Consumers using dialysis support units, respirators and similar life support devices
 - All customers for gas
16. Types of non-economic support applied – Protection from disconnection for electricity and warnings before disconnection, emergency response for gas
17. Do the support schemes refer to seasons – No
18. Do the support schemes refer to quantity threshold – Yes, for electricity (Monthly 150 kWh)
19. Best practice on vulnerable consumers protection – Not answered



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