



Energy Regulators Regional Association

BENCHMARK ANALYSIS:
**Different Practices in Identifying,
Categorizing and Supporting
Vulnerable Consumers
in ERRA Member Countries**

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Energy Regulators Regional Association

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Different Practices in Identifying, Categorizing and Supporting Vulnerable Consumers
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The Analysis was prepared based on information collected from ERRA Customers and Retail Markets Working Group Members in the period of November 2014 – June 2015.

The following ERRA Members submitted their answers:

- Public Services Regulatory Commission of **Armenia**
- Regulatory Commission for Energy in Federation of **Bosnia and Herzegovina (FERK)**
- Regulatory Commission for Energy of Republika Srpska, **Bosnia and Herzegovina (RERS)**
- **Hungarian** Energy and Public Utility Regulatory Authority
- Public Utilities Commission of **Latvia**
- National Commission for Energy Control and Prices of **Lithuania**
- Energy Regulatory Commission of **Macedonia**
- **Nigerian** Electricity Regulatory Commission
- **Romanian** Energy Regulatory Authority
- Federal Tariff Service of the **Russian Federation**
- Electricity and Co-Generation Regulatory Authority of **Saudi Arabia**
- Regulatory Office for Network Industries of **Slovakia**
- Energy Market Regulatory Authority of **Turkey**
- National Energy and Utilities Regulatory Commission of **Ukraine**

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Different practices in identifying, categorizing and supporting vulnerable consumers in ERRA Member Countries

The aim: To collect and analyze the different definitions describing the category of vulnerable consumers. There will be focus on the different supporting methods (financial and non-financial support schemes) among ERRA's countries.

Method of data collection: Questionnaire (see Appendix 1)

I. General Information:

According to the DIRECTIVE 2009/72/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC, Article 3:

"(7) Member States shall take appropriate measures to protect final customers, and shall, in particular, ensure that there are adequate safeguards to protect vulnerable customers. In this context, each Member State shall define the concept of vulnerable customers which may refer to energy poverty and, inter alia, to the prohibition of disconnection of electricity to such customers in critical times. Member States shall ensure that rights and obligations linked to vulnerable customers are applied."

Although the majority of ERRA members is a non-member state of the EU, all the participants fulfill the legal definition, or apply categories that can be associated with vulnerable consumers.

II. Defining vulnerable consumers

In order to take some measures to protect final consumers the first step should be to define the concept of vulnerable consumers.

In some ERRA member states – from those who sent responses to the questionnaire – the definition of vulnerable consumers does exist, however there are many differences between the respective categories, as follows:

1. **Romania** – Vulnerable consumers are defined as household consumers who are in risk of social discrimination based on age, healthy or low incoming and who, in order to prevent this risk, are beneficiary of social protection measures, including financial aid.
2. **Nigeria** – The approved tariff Order (MYTO) provides for lifeline customers who consume a maximum of 50kWh per month to pay rates that are not cost reflective and do not pay fixed charge. By definition, vulnerable consumers are those who consume a maximum of 50kWh per month.
3. **Lithuania** – Vulnerable electricity customers are households or persons who receive the monetary social support by the national laws (Information System of the Social Support for the Family). The list of vulnerable consumers or groups of vulnerable consumers and what kind of guaranties could be applied to such vulnerable consumers or groups of vulnerable consumers, related to electricity supply, are defined by Government or designated institution. The list of vulnerable consumers or groups of vulnerable consumers was approved by the Government in May (Resolution on Additional guaranties for socially vulnerable electricity consumers).

Vulnerable gas customers are households and consumers consuming up to 20 thousand cubic meters of gas/year.

4. **Latvia** – Vulnerable consumers are defined as poor or low-income family (person) or a large family consuming electricity for its household needs (final consumption). Large family is a family, which cares for three or more children, including children placed in a foster family and children under guardianship.
5. **Ukraine** – In the Law of Ukraine “On state social assistance to low-income families” there is a definition for ‘low-income families’ – those with monthly gross income is below the poverty level of a family. This total income is calculated based on methodology of calculating the total family income for all types of social assistance, approved by the executive body.
6. **Slovakia** – **Definition according to Act on Regulation:** vulnerable customers are household electricity/gas customers and small-sized undertakings. **Definition according to Act on Energy:** vulnerable customer is a household customer whose vital functions depend on the electricity/gas off-take or who suffers from a severe disability and uses electricity/gas for heating and reported and demonstrated such fact himself or herself or through his or her electricity/gas supplier to the distribution system operator of that system to which his or her off-take point is connected, in a manner described in the market rules.
7. **Hungary** – According to Act LXXXVI. of 2007 on Electricity Article 3. 66. ‘Vulnerable customers’ shall mean those household customers who require special attention due to their social disposition defined in legislation, or some other particular reason, in terms of supplying them with electricity. Detailed provisions under Articles 64.-65.

There are other ERRA member states that did not have a legal definition for vulnerable consumers but they still have certain categories of consumers that can be associated with vulnerable consumers such as:

1. **Saudi Arabia** – Consumers who receive financial support from ministry of social affairs and consumers with urgent needs for electricity.
2. **Macedonia** – Households which are eligible for receiving social assistance are as well as eligible for receiving financial support for reducing energy poverty.
3. **Bosnia and Herzegovina (FERK)** – Households that are pensioners who use the pension up to the amount of guaranteed pensions and users of financial assistance with the monthly consumption below 268 kWh/348 kWh have subsidies of 5.50/7.00 KM, (2.8/3.6 Euro) depending on the consumed energy in the billing period.
4. **Bosnia and Herzegovina (RERS)** – The Government of the Republika Srpska adopted a Program for protection of socially vulnerable electricity consumers in the Republika Srpska in December 2007. The Government paid subsidies in 2008, 2009 and 2010, but in the adopted budget of the Government of the RS for 2011, it did not provide funds for this purpose. In 2012 the Program was continued, but in 2013 and 2014 there were no funds for this purpose. The Program defined, as socially vulnerable electricity customers, the following categories of society:
 - a. pensioners with the lowest pensions;
 - b. users of permanent financial assistance;
 - c. users of allowance for support and care of another person;
 - d. users of maternity allowances;
 - e. users of allowance for children.
5. **Turkey** – Consumers subjected to regulated electricity tariff that are divided into 5 categories as:
 - a. residential, who are martyrs’ families and war veterans buys electricity almost 50% lower than current regulated electricity tariff for the residential;
 - b. industrial;
 - c. commercial;

- d. agricultural irrigation;
- e. general lightening.

Beside this, Electricity Market Law provides that in case of a necessity to give subsidies relevant to certain areas and certain goals with the aim of supporting consumers, subsidies should be applied providing no intervention on prices. The amount of subsidy and principles should be determined by the Board of Ministries after the proposal of relevant Ministry and be afforded by budget of relevant institution.

6. **Armenia** – The consumers who are engaged in State social assistance program receive subsidy from government in the gas sector.
7. **Russian Federation** – Within the Russian legislation there is no such definition as „vulnerable customers“ in the form as it is in the EU legislation and the 3rd Energy Package. In this regard the questionnaire was filled with a more general approach on this term, where the group of “vulnerable customers” contains not only those entities who live in energy poverty, but also other entities provided by the Russian legislation.

1. In the sphere of electricity: In accordance with Federal Law of March 26, 2003, No. 35-FZ “On Electricity”, to the consumer category “population” and to other similar consumer categories electricity (power) is supplied at regulated prices (tariffs).

In accordance with Annex No. 1 to Basics of Pricing in the Field of Regulated Prices (Tariffs) in the Electricity Sector approved by Decree of the Government of the Russian Federation of December 29, 2011, No. 1178, the following are classified as consumer categories similar to the category “population”, to which electricity (power) is supplied at regulated prices (tariffs):

- a. Realizers of utility services (partnerships of housing owners, homebuilding, housing or any other specialized consumer cooperatives, or management companies), lessors (or persons authorized by them) that provide to citizens living room spaces from the specialized housing fund, including living premises in hostels, living room spaces in temporary public housing, living room spaces in the fund of temporary accommodation of displaced persons recognized as refugees, and also living room spaces for social protection of certain categories of citizens who acquire electricity (power) for household residential consumption by the population in the volumes of actual consumption of electricity by the population and volumes of electricity consumed at common facilities.
- b. Horticultural, market-gardening or dacha non-commercial associations of citizens – non-for-profit associations established by citizens on a voluntary basis for providing support to their members in resolving common social and economic issues related to maintenance of horticulture, market-gardening and dachas (including small-scale cultivation and construction).
- c. Legal entities that acquire electricity (power) for the purpose of it being consumed by convicts in premises where they stay provided there is separate metering of electricity for such premises.
- d. Legal entities and individuals that acquire electricity (power) for the purpose of consumption for public living needs, in residential areas of military units that pay according to the energy supply agreement pursuant to the common electricity metering device.
- e. Religious organizations maintained at the expense of the congregation.
- f. Suppliers of last resort, energy distribution, energy supply organizations that acquire electricity (power) for the purpose of its further sale to the population and to similar categories of consumers in the volumes of actual consumption by the population and by similar categories of consumers and volumes of electricity consumed at common facilities for public living needs of citizens and not used for carrying out commercial (professional) activities.
- g. Associations of citizens that acquire electricity (power) for use in household outbuildings (cellars, barns) belonging to them.

- h. Non-commercial associations of citizens (garage-construction, garage cooperatives) and citizens that own detached garages who acquire electricity (power) for the purpose of using it for utility household needs and not for using for carrying out commercial activities.

From September 1, 2013, in 6 constituents of the Russian Federation, the size of regulated prices (tariffs) at which electricity (power) is supplied to consumers belonging to the group "population" and to similar consumer categories depends on the volume of electricity (power), which is consumed by the named consumers – within the social norm of consumption of electricity (power) and in excess of the said norm of consumption (Federal Law of March 26, 2003, No. 35-FZ "On Electricity", Decree of the Government of the Russian Federation of July 22, 2013, No. 614).

In accordance with item 71 of the Basics of Pricing in the Sphere of Regulated Prices (Tariffs) in the Electricity Sector approved by Decree of the Government of the Russian Federation of December 29, 2011, No. 1178, decreasing coefficients from 0.7 to 1 are applied in the course of approving prices (tariffs) for electricity (power) supplied to the population residing in urban settlements in houses equipped according to the set procedure with stationary electric hot plates for cooking food and/or with electric heating installations, and also to the population residing in rural settlements depending on regional specifics, social and economic factors existing in a constituent of the Russian Federation pursuant to the decision of the executive power body of the corresponding constituent of the Russian Federation in the sphere of state regulation of tariffs.

2. In the sphere of heating energy sector:

In accordance with Article 22 of Federal Law of July 27, 2010, No. 190-FZ "On Heat Supply", Rules for Heating approved by the Government of the Russian Federation, categories of socially important consumers are determined alongside with specifics of introducing restrictions in connection with them, termination of supply of heat, heat transfer medium.

In accordance with items 95 and 96 of the Rules for Heating in the Russian Federation approved by Decree of the Government of the Russian Federation of August 8, 2012, No. 808 with respect to socially important categories of consumers, a special procedure for introduction of restrictions for consumption mode is applied. With respect to such consumers, regimes for introduction of restrictions have to be determined in the heat supply agreement.

Socially important categories of consumers (consumer facilities) include, for example, public authorities, medical institutions, educational institutions of primary and secondary education; social welfare institutions; metropolitan railway; livestock and poultry farms, greenhouses, etc.

With respect to citizens-consumers, management companies, partnerships of housing owners, housing cooperatives or other specialized consumer cooperatives that carry out activities related to management of an apartment building who concluded an agreement with resource supplying organizations, the procedure for restriction and termination of supply of heat is set in accordance with the housing legislation.

In addition, in accordance with Article 17 of Federal Law of November 24, 1995, No. 181-FZ "On Social Protection for Persons with Disabilities in the Russian Federation", persons with disabilities and families that have children with disabilities get at least 50 per cent discount of the cost of payment for dwelling premises classified as state or municipal housing and payment for utility services (irrespective of the type of a housing fund), and in residential buildings that have no district heating – for the cost of fuel acquired within the norms set for sale to the population.

In accordance with Article 159 of the Housing Code of the Russian Federation, citizens (the users of dwelling premises classified as state or municipal housing; the tenants under contracts of tenancy of dwelling premises of dwelling premises classified as private housing; members of housing cooperatives; the owners of dwelling premises) are entitled to receive subsidies for paying for dwelling premises and

utility services that are provided to citizens in case their expenses associated with payment for dwelling premises and utility services exceed the maximum admissible share of citizens' expenses for payment for dwelling premises and utility services in the family's aggregate income.

III. Identifying vulnerable consumers

The task of identifying vulnerable consumers is assigned to different entities in each country, as follows:

1. To the Government in **Nigeria, Lithuania, Macedonia, Bosnia and Herzegovina (FERK), Bosnia and Herzegovina (RERS)**.
2. In **Turkey** to a working group consisting of the representatives of Ministry of Energy and Natural Resources, NRA, suppliers and DSOs and some academic professionals; they work on the definition of vulnerable consumers and measures to protect vulnerable consumers in both electricity and natural gas market.
There is no explicit legal provision which determines the responsible authority which controls whether the consumer fulfil the criteria of being vulnerable customer or not. On the other hand, Ministry of Family and Social Policies is expected to control whether the consumer fulfil the criteria of being vulnerable customer or not because of managing the social and financial data about poor relief.
3. In **Latvia** the applicant shall turn to the supplier and certify its compliance with a status of poor or low-income family or large family. Local authorities shall inform the supplier about these families (persons).
4. In **Saudi Arabia** the DSO and NRA.
5. In **Romania** the Government has to define the criteria to include consumers in the vulnerable consumer category. Until now there are no criteria but final consumers with a monthly income under the minimum wage have special tariffs. To benefit of this tariffs they have to get a document from the local authorities to prove their income and present this document to the supplier of last resort. For old people or people with serious health problems there are nonfinancial measures that has to be applied by the DSO.
6. In **Armenia** in gas sector subsidy receive those consumers who are engaged in State social assistance program.
7. In **Ukraine, Hungary and Slovakia** the vulnerable consumers are identified by the DSO.
8. In **Russia** consumer categories mentioned are determined by corresponding federal legislative or normative legal acts of the Government of the Russian Federation. When providing relevant services, suppliers and distribution system operators have to be guided, among other things, by legal norms that regulate relations with involvement of such consumers.

IV. Supporting vulnerable consumers

Each country has its own system in order **to provide protection for vulnerable consumers that can include financial or nonfinancial aid or in some cases both, as follows:**

1. **Nigeria**
 - a. **Financial aid** in form of a "Lifeline tariff" implemented by all Distribution/Supply Companies. The tariffs are sets by NRA in conjunction with the Distribution/Supply Companies and are supported by other consumers (as a cross subsidy) and government subventions.
 - b. **Nonfinancial aid** that involves non disconnection of Customers who have applied for assistance from the Power Consumer Assistance Fund or some other Customer welfare mechanism recognized by the Commission and a decision on the application has not be made, shall not be disconnected

as stipulated in Section 10 (e) of the Nigerian Electricity Regulatory Commission's Connection and Disconnection Procedures for Electricity Services 2007 Regulation. The nonfinancial measures are sets by NRA and are applied by DSOs.

2. Lithuania

- a. **Financial aid** in form of discounts for connecting devices to the distribution network (vulnerable consumers should cover only 20 % of connection (DSO's) costs). Discount is a fixed amount set by the Law (enforced by Parliament), also NRA can set another fixed relevant amount. The remaining part of the costs incurred by connecting users' devices is covered by DSO, set by the government. This measure was applicable till Government resolution on vulnerable consumers and it's still valid.
- b. **Nonfinancial aid.** Additional support measures by resolution on Additional guarantees for socially vulnerable electricity consumers:
 - i. Restrictions to disconnection due to non-payment;
 - ii. Possibility to pay for electricity for the previous month till the end of next month;
 - iii. Restrictions to disconnection in very cold or very hot weather, on Friday, Weekend, Eve of Public Holiday, Public Holiday;
 - iv. Facilitations in terms of connection to the electricity grid;
 - v. Exemption from paying fine due to nonpayment for electricity for the period of three months;
 - vi. Exemption from payment for paper bill if customer wants it.

Additional measure is guaranteed electric supply (the Law on Electricity of the Republic of Lithuania, article 44).

3. Saudi Arabia

- a. **Financial aid** in form of subsidies given directly to vulnerable **consumer**. The financial aid is set by NRA and the cost is supported by the government.
- b. **Nonfinancial aid** that involve continuity of supply to Consumers with urgent needs for electricity, set by the NRA and applied by the DSO and NRA.

4. **Macedonia** – Only financial aid in form of subsidies paid by the Government (Ministry of Labor and Social Affairs) directly to the vulnerable customers.

5. **Bosnia and Herzegovina (FERK)** – Only financial aid in form of subsidies directly to the suppliers, given and supported by the government.

6. **Latvia** – Only financial aid in form of subsidies given from the state budget to the service provider. The Electricity Market Law states that the largest Latvian trader AS "Latvenergo" is providing electricity to vulnerable consumers from 1 January 2015 to 31 December 2015, and then the service provider will be selected by tender. During the period from 1 January 2015 to 31 December 2015, the Electricity Market Law sets the amount of aid, and then it will be set by the government.

7. Bosnia and Herzegovina (RERS)

- a. **Financial aid in form of** subsidies paid by the government. The Ministry of Industry, Energy and Mining has exercised quarterly allocation of funds to distribution companies and suppliers of tariff customers in the Republika Srpska.
- b. **Nonfinancial aid** set by NRA. General conditions for delivery and supply of electricity provides that a distributor and supplier must take appropriate measures to avoid the disconnection, due to non-payment, during winter and extreme cold weather, but the suspension of delivery can be used as a measure of last resort only. Paragraph 4 of this Article provides that a distributor cannot exclude or refuse re-entrance of the building housing on the network if the ultimate purchaser or user of the

facility uses electro-medical equipment necessary to maintain health, and whose work is necessary to supply from the distribution network, which is defined by agreement on access.

8. **Turkey** – Only financial aid in form of special tariffs applied by their supplier. In electricity market, suppliers of last resort and default suppliers are the same companies and have to supply electricity to consumers defined in question 2 at a lower regulated tariff determined and approved by NRA. These measures are sets by the NRA.

9. **Romania**

a. **Financial aid** in form of special tariffs sets by the NRA and applied by the suppliers of last resort to the consumers that are included in the low incoming category. The cost is supported by all customers of the last resort suppliers.

b. **Nonfinancial aid** that involves continuity of the electricity supply assured by the DSO for old or health problems peoples.

10. **Armenia** – Only financial aid in form of subsidies paid by government to vulnerable consumer through the supplier. The financial aid is set by the government.

11. **Ukraine** – Only financial aid set and given by the government. When paying for communal services and electricity consumption:

- state social assistance (according to the Law)
- subsidy
- recovery of additional expenses for communal service payment in terms of price/ tariff increase for services

12. **Slovakia** – Nonfinancial aid set by the NRA and the DSO. DSOs are obliged to notify such vulnerable customers in writing about each planned limitation or interruption of electricity/gas distribution to their off-take points; make such planned interruption of electricity/gas distribution only after the vulnerable electricity/gas customer acknowledged the receipt of notification of interruption in electricity/gas distribution, and allow for communication of such vulnerable customer directly with the distribution system operator for reporting faults.

13. **Hungary**

a. **Financial aid** in form of subsidies, payment in instalments or deferred payment, possibility of prepayment meters.

b. **Nonfinancial aid** - disabled consumers shall be offered certain privileges in particular in connection with metering, reading and billing procedures and payment terms, consistent with their respective needs. Those disabled consumers, whose health or life is endangered by disconnection from or suspension of electricity supply, shall not be disconnected from supply in case of late payment or nonpayment.

Both financial and nonfinancial aids are sets by the government and are applied by the suppliers and the DSO.

14. **Russian Federation**

a. **Financial aid in form of special tariff and subsidies.** Relevant tariffs (prices) are set, or pursuant to the set procedure a subsidy is granted to them in order to pay for utility services, or a corresponding regime is introduced in the part of restricting heat supply.

In accordance with Articles 159, 160 of the Housing Code of the Russian Federation, the procedure for determining the size of subsidies and the procedure for granting them, the list of documents attached to the application, conditions for suspension and termination of granting of subsidies, the procedure for determining the family composition of the subsidy recipient and calculation of the

aggregate income of such a family, and also specifics of granting subsidies to certain categories of citizens are set by the Government of the Russian Federation.

Financing of expenses related to provision of subsidies is done from budgets of constituents of the Russian Federation.

The procedure for financing of expenses related to provision of subsidies and also the procedure for financing expenses related to provision of subsidies to citizens who are doing military service and who are living in closed military towns is set by the Government of the Russian Federation.

For the purpose of calculation of subsidies, a local self-governing authority can set standards that are different from the set regional standards for normative space of living rooms used for the calculation, for the cost of housing and utility services and for the maximal allowed share of citizens' expenses on payment for living room spaces and utility services in the aggregate income of the family if it improves the situation of citizens who receive such subsidies. Additional expenses on provision of subsidies mentioned in the present part are financed at the expense of funds from the local budget.

Compensation of expenses related to payment for living room spaces and for utilities at the expense of funds of corresponding budgets can be granted to certain categories of citizens according to the procedure and on conditions specified in federal laws, in laws of constituents of the Russian Federation and in normative and legal acts of local governing authorities.

The subsidies are paid to the vulnerable consumers by the local authorities.

- b. **Nonfinancial measures.** In accordance with the Rules of Full and/or Partial Restriction of the Regime of Consumption of Electricity approved by Decree of the Government of the Russian Federation of May 4, 2012, No. 442, a list of consumers is stipulated who are not covered by the general procedure of restricting the electricity supply regime.

Such consumers include, for example, organizations of railway, water and air transport in terms of certain facilities.

These nonfinancial measures are sets by the government and are applied by the DSO.

V. Conclusions

All countries involved in the survey define vulnerable consumers according to/depending on the consumers' income (there are some other categories as well, such as elderly people, peoples with health problems, large families, consumers with urgent need of supply).

The role of identifying the conditions that must be fulfilled by the consumers in order to be considered and registered as a vulnerable consumer is in all cases assigned to different state/government authorities. The purpose of the questions regarding identification of the vulnerable consumer was to determine which authority has to establish the conditions to include a consumer in the category of the vulnerable consumer, but some of the answers do not refers to this, so it should be discussed in the meeting which state/government authority determines the conditions to became vulnerable consumer and what are the basic conditions.

Each country has its own system to support vulnerable consumers that involves financial or/and nonfinancial aid. Each system is created in order to respond to a specific need, but on the basis of the collected data what we can conclude is that regarding the financial support, there are two regimes, one that involves special tariffs applied by the supplier or the DSO and another one that involves subsidies paid by a state authority to the supplier or directly to the consumer. In order to determine the advantages for consumers by using one or another of these support regimes the next table can be useful:

		Special tariffs	Subsidies
How easy is for customers to have access to this financial support.	Points	1	1
	Explanation	The documents that prove the right to access the financial support shall be submitted to the supplier or DSO.	The documents that prove the right to access the financial support shall be submitted to the state authority.
	Comment	There is the same level of difficulty in both situations.	
The payment of the subsidies.	Case no. 1		
	Points	1	1
	Explanation	The consumer pays directly to the supplier or DSO.	The subsidy is paid directly to the supplier. In this case, the consumer pays only the difference, similar to special tariffs situation.
	Comment	There is the same level of difficulty in both situations.	
	Case no. 2		
	Points	1	0
	Explanation	The consumer pays directly to the supplier or DSO.	The subsidy is paid directly to the consumer. In this case the consumer takes the subsidy and passes it to the supplier or DSO. This action involve supplementary activities for consumer.
Comment	In this case the advantage is for the special tariffs.		
Who support this financial aid?	Case no. 1		
	Points	1	1
	Explanation	If the special tariffs are applied by DSO or supplier to all consumers it means that subsidy is supported by all consumers.	If the state authority pays the subvention it means that subsidy is supported by all consumers.
	Comment	In both situations the subvention is supported by all consumers.	
	Case no. 2		
	Points	0	1
	Explanation	If the special tariffs are applied by the supplier of last resort only to a specific category of consumers, this can be considered discriminatory.	If the state authority pays the subvention it means that the subsidy is supported by all consumer.
Comment	In this case the advantage is for the subsidy.		

Questionnaire

(Country:)

1. **Is there any legal definition of the vulnerable consumers?**
 - a. Yes. Explain the definition, please:
 - b. No.

2. **In case of "No" at the previous question, are there any category of consumers that are not defined as vulnerable consumers but can be associate with this category or that receive any form of financial / nonfinancial support?**
 - a. Yes. Please indicate:
 - b. No.

In the next questions when we refer to vulnerable consumers we also refer to those categories included at question no. 2.

3. **Who has to identify the vulnerable consumers?**
 - a. Supplier
 - b. DSO
 - c. Others. Please indicate:

4. **Are there some mandatory measures to protect vulnerable consumers?**
 - a. Yes
 - b. No.

5. **Measures to protect vulnerable consumers are likely:**
 - a. Financial.
 - b. Nonfinancial
 - c. Others. Please indicate:

6. **The financial support for a vulnerable consumer includes:**
 - a. Special tariffs applied by their supplier. Is this a designated supplier (ex. Supplier of last resort, default/implicit supplier) or not_ If yes, please specify.
 - b. Subsidies (Money given directly to vulnerable consumer or to their supplier).
 - c. Both special tariffs and subsidies. In this case please indicate the way it works:
.....
 - d. Others. Please indicate:

7. **Who sets these financial measures?**
 - a. Government
 - b. NRA
 - c. Suppliers
 - d. DSOs
 - e. Others. Please indicate:

8. The subsidies are paid to the vulnerable consumers by the:

- a. Government
- b. Local authorities.
- c. Others. Please indicate:

9. The nonfinancial support for vulnerable consumers includes (please indicate):

.....

10. Who sets these nonfinancial measures?

- a. Government
- b. NRA
- c. Suppliers
- d. DSOs
- e. Others. Please indicate:

11. Who is authorized to apply this nonfinancial measures:

- a. Suppliers. Please explain:
- b. DSO.
- c. Others (please indicate:).