

Plain language and the right to understand in the regulated electricity bill in Spain

Blas-José Subiela-Hernández, Alba María Gálvez-Vidal & María Ascensión Miralles González-Conde

Universidad Católica de Murcia (Spain)

bsubiela@ucam.edu, amgalvez@ucam.edu, mmiralles@ucam.edu

Abstract

According to the *National Market and Competition Commission* (“Comisión Nacional del Mercado y la Competencia”, “CNMC”), 40% of domestic users do not understand their electricity bill. This paper analyses whether the bill, which is mandatory for all domestic consumers by law (consumers with contracts under 15 kW), is written in plain language. Plain language is an essential requirement to achieve the right to understand. This right should be respected and promoted especially by the public administration. The research focuses on the analysis of the model of the regulated electricity bill in Spain, from a double perspective. First, we analyse whether the text complies with the standards of textuality coming from Text Linguistics (Beaugrande & Dressler, 1981), by means of a qualitative approach. Next, a quantitative methodology is used to identify whether the invoice complies with the grammatical recommendations of plain language. The starting hypothesis considers that the text of this document was written without taking into account the recommendations for plain language from the grammatical perspective, nor have the particularities implied by the reception and comprehension of its contents in a given pragmatic context been observed. The results tend to confirm our hypothesis and, where appropriate, we offer alternative forms of wording that would facilitate a better understanding of the concepts registered in the bill. The current electricity bill has been drawn up as an administrative legal document whose elaboration did not take into account either its recipients or the usefulness that this document should have had for them.

Keywords: transparency, plain language, electricity bill, standards of textuality, discontinuous text, legal-administrative texts, consumer rights.

Resumen

Lenguaje claro y derecho a entender en la factura eléctrica regulada en España

Según la Comisión Nacional del Mercado y la Competencia (“CNMC”), el 40% de los usuarios domésticos no entienden su factura eléctrica. Este trabajo analiza si la factura, que por ley es obligatoria para todos los consumidores domésticos (consumidores con contratos de menos de 15 kW), está redactada en un lenguaje sencillo. El lenguaje sencillo es un requisito indispensable para lograr el derecho a entender. Este derecho debe ser respetado y promovido especialmente por la administración pública. La investigación se centra en el análisis del modelo de factura eléctrica regulada en España, desde una doble perspectiva. En primer lugar, se analiza si el texto cumple con los estándares de textualidad provenientes de la lingüística del texto (Beaugrande y Dressler, 1981) mediante un enfoque cualitativo. A continuación, se utiliza una metodología cuantitativa para identificar si la factura cumple con las recomendaciones gramaticales del lenguaje claro. La hipótesis de partida considera que el texto de este documento ha sido redactado sin tener en cuenta las recomendaciones para el lenguaje claro desde la perspectiva gramatical, y que tampoco se han observado las particularidades que implica la recepción y comprensión de sus contenidos en un contexto pragmático dado. Los resultados tienden a confirmar la hipótesis y, cuando corresponde, se ofrecen formas alternativas de redacción que facilitarían una mejor comprensión de los conceptos. La factura eléctrica vigente ha sido redactada como un documento jurídico administrativo cuya elaboración no tuvo en cuenta ni a sus destinatarios ni a la utilidad que este documento debe tener para ellos.

Palabras clave: transparencia, lenguaje simple, factura de electricidad, estándares de textualidad, texto discontinuo, textos jurídico-administrativos, derechos del consumidor.

1. Introduction

One of the main reasons for regulating the electricity bill by Law is to ensure consumers receive the information about their electricity consumption and the costs related to it in the clearest, most transparent way possible, as well as ensuring maximum ease of comparison with other electricity providers. Such is required by the European Union in Directives (2009/72CE, 2019/944CE), recommendations (*user-friendly* bill template and list of essential items¹) and various studies (*European Commission Consumers, Health, Agriculture and Food Executive Agency*, 2018 and *Council of European Energy Regulators*, CEER, 2021). Directive 2019/944 has been transposed into

Spanish law through legislation and is still in force through the Resolution of April 28th 2021, which establishes the minimum content required and the template of the electricity bill to be used by the main marketers (Dirección General de Política Energética y Minas, 2021). This resolution determines the template form to be followed by every bill received by consumers with a regulated tariff (Voluntary Price for Retail Consumers, “PVPC” in its Spanish acronym) and the minimum content required for consumers in the free market with low tension supply up to 15kW. Therefore, the content of all electricity bills for domestic consumers is fixed by Law, both for the free market and the regulated market, a total of nearly 28 million users (National Market and Competition Commission, CNMC, 2022, p. 40).

Still, despite the regulation, most consumers do not understand their electricity bill. According to the Organisation of Consumers and Users (OCU, 2022), only 11% of users understand their electricity bill. The “CNMC”, through their domestic panel (“panel de hogares” in Spanish) has consistently declared the electricity bill is not understood by the vast majority of consumers (CNMC, 2016, 2021, and 2022). It must be noted that, despite the fact that the current bill template was introduced in 2021, it is still very similar to the one introduced in 2014.²

The electricity market in Spain is complex and the concepts that appear on the bill are complex too. Still, there are many examples in history where aiming for a form of user-centred communication has succeeded in presenting complexity in a simple and accessible way. An iconic example of this is Harry Beck’s diagram of London’s tube map, introduced in 1932 (Cartwright, 2015). Beck’s initiative meant putting aside topographic maps, which were very precise but very complex, and adopting schematic maps, less representative of reality, but much more useful. The recent initiative of Madrid’s city council to draw up a traffic fine that is easier to understand has been a success (Montolío & Tascón, 2020).

Communicating clearly “means delivering easily, straightforwardly, simply and efficiently relevant information to citizens using any of the current channels [...] adapted to its specific traits” (Montolío & Tascón, 2020, p. 151). Pacios et al. (2016, p. 722) also find that “making information available is not enough to achieve transparency”. They add that information, in order to be considered transparent, must be presented “in adequate language and form, and must be comprehensible for all different types of recipients”. Therefore, to achieve transparency, plain language is essential. According to the

International Plain Language Federation (IPLF, Plain Language definitions, 25) “a communication is in plain language if its wording, structure, and design are so clear that the intended readers can easily find what they need, understand what they find, and use that information” (Plain Language definitions, 25). One of the areas where the need to introduce plain language has been pressing is in legal-administrative texts: for reference, see the work of Cassany (2005), Montolío (2012 and 2019), Alsina Naudi (2018) or da Cunha and Escobar (2021), as well as several guides for clear communication by several public administrations, such as the *European Commission* (2015), the *Community of Madrid* (Comunidad de Madrid, 2019) or the *Government of Aragón* (Gobierno de Aragón, 2020). According to Marazzato (2018, p. 164), plain language “is based on five pillars: target public, purpose, structure, design and, especially, the wording of the content, according to standards of grammar, cohesion and coherence”. Therefore, a text written in plain language is not achieved solely by the application of a series of syntactic rules or textual formulas, it requires a plan that puts the user (target readers) at the centre and takes its use (purpose) into consideration. The main recommendations when it comes to drafting plain texts can be put into two categories: grammar (aspects related to discourse, morphosyntax and lexicon) and pragmatics (aspects related to cohesion, coherence, or the purpose of the text, for instance).

The electricity bill has received little attention from academics, despite its important contents. There have been efforts to encourage energy efficiency through informative strategies in bills (Bichsel et al., 2019) or to apply blockchain technology to the billing process (Nour et al., 2022 and Hlaing & Nyaung, 2019). The only research on the user’s comprehension of this document is focused on design and form (Subiela Hernández et al., 2019 and Subiela Hernández et al., 2022), but it does not analyse linguistic aspects.

2. Methodology

Before defining the methodological tools used, we must define the object of study in detail, which is why we will first address the categorisation of the regulated electricity bill as a text. Once the features of the object of study have been defined, we will present the methodological material and tools used.

2.1. Categorisation of the object of study

2.1.1. *The regulated electricity bill as a discontinuous text*

The classification of texts by form addresses the question of how the text is formally presented. (Organisation for Economic Co-operation and Development (OECD), 2010) There are four types: continuous, discontinuous, mixed, and multiple. According to this categorisation, the electricity bill is a discontinuous text, because “texts with a discontinuous form are organised by presenting information in a non-sequential way” (Archugar cited in Durán, 2019, p. 378). This form of discontinuous text allows them, according to Casas Sánchez et al. (2018) to act “[...] as graphic organisers used to facilitate the explanation and the comprehension of information” (p. 96). As highlighted by Casas Sánchez et al. (2018) this is the most widely used type of text in contemporary social activity and its reading is related to one’s surroundings and daily life.

Discontinuous texts allow for the autonomy of the recipient, who will determine the value of the elements of the text depending on the interpretation they make of the text’s communicative purpose, structure and full sense based on their previous knowledge. Therefore, due to the reasons stated, discontinuous texts can also be challenging in terms of comprehension and interpretation if the target reader does not possess any previous knowledge or familiarity with the information presented (Vössing et al., 2017).

2.1.2. *The regulated electricity bill as a specialised text*

The regulated bill is also an expository text since its communicative purpose is to present information in a clear and organised way. Depending on the target recipients, expository texts can be classified as informative texts or specialised texts (Álvarez, 2000). Since the target reader of the electricity bill is the general public with no specialised knowledge, this document is (or, rather, should be) an informative text. However, if we analyse the textual features of the bill without taking the intended recipients into consideration, we observe formal traits typical of specialised texts.

According to Cabré Castellví (2002), the general agreement on the characterisation of specialised texts is that they are verbal products of specific communicative registers whose theme is a specialised area of knowledge, which respect specific rhetorical and style traditions, present

lexical specificity and certain morphosyntactic tendencies, and tend to display abundant non-linguistic resources to represent specialised information. The regulated bill has a specific communicative register within the administrative field, respects a specific formal style (discontinuous text), displays specialised lexicon (specialised terms, syntagmatic compounds, acronyms, etc.), tends towards nominalisation at the morphological level, and offers a controlled syntax. Lastly, it includes statistical graphs to present specialised information visually. According to these criteria, we can consider bills to be specialised texts. Nevertheless, to conclude what level of specialisation they belong to, it would be necessary to undertake an additional study of reception and analysis, which is not included in this investigation. What does seem evident is that the regulated electricity bill is a text addressed to the general public, but the information it presents is specialised and it displays controlled syntax and specialised lexicon impeding its full comprehension. For this reason, we are inclined to think we are working with a specialised informative text, defined by Cabré Castellví (2002, p. 28) as “widely distributed texts meant for a public to which the information is relevant, but who do not have specific knowledge on the matter”.

2.1.3. The regulated electricity bill as a legal-administrative text

Finally, regarding the field criteria, the regulated electricity bill is a legal-administrative text, since it comes from the public administration and it is legally binding. Although the bill is issued by each supply company (the main marketers, “Comercializadoras de Referencia”, “COR”), it respects the form and content established by the government through laws. Which means it is part of what Vilches and Sarmiento (2011, p. 24) call “administrative discourse”, in which authors identify language that is “obscure for most citizens” (p. 17). This situation has sparked the appearance of several initiatives directed towards improving legal-administrative language, especially focusing on grammar. The most significant in Spanish have been analysed and systematised by da Cunha and Escobar (2021), whose scheme is used as the basis of the grammar analysis undertaken in this investigation.

2.2. Material and method

The methodology was developed keeping in mind the characterisation of the text explained above. In order to address all its special features, the regulated

bill must be analysed with a double approach: qualitative, from the perspective of Text Linguistics (Beaugrande & Dressler, 1981), which will allow us to analyse contextual content like pragmatics; and quantitative, from the perspective of Text Grammar (Casado Velarde, 1993), which will allow us to pay more attention to the linguistic form.

Therefore, the analysis of the object of study is approached with a mixed methodology developed from general to specific (top-down). The qualitative analysis is undertaken first, allowing us to analyse the interpretative context of the bill, and, after that, we turn to the quantitative analysis of the formal features of the text. This order allows us to establish a dialogical relationship between them to triangulate the interpretation of the results.

The object of study is the electricity bill templates published in the Resolution made on April 28th, 2021 by the General Directorate for Energy Policy and Mines (Dirección General de Política Energética y Minas, 2021), which establishes the minimum content required and the electricity bill template to be used by the main marketers; specifically, the template for consumers with PVPC (see Annex I in the mentioned Resolution) and the template for consumers with PVPC and social bonus (included as Annex II in the Resolution).

2.2.1. Qualitative methodology: linguistic analysis

To undertake the qualitative analysis, the standards of textuality proposed by Beaugrande and Dressler (1981) are applied. These standards allow us to assess the communicative value of a given text. The context analysis of the object of study is designed keeping in mind the target reader of the bill (domestic consumers): a general recipient who does not have specialised education or training to interpret the bill (also, among the recipients of the bill there are people classified by law as “severely vulnerable”, who are described as people at risk of social exclusion). The analysis has been carried out in compliance with the following standards of textuality, organised in four categories as follows.

The text-centred standards are coherence and cohesion. To analyse coherence, we take into consideration whether the information contained in the bill can be interpreted consistently with the previous knowledge of the world held by the recipient. Regarding cohesion, the analysis takes into consideration not only the typical recipient, but also the textual characteristics (in this case, those of discontinuous texts and specialised texts).

The standards focused on the sender and the receiver of the text are intentionality (sender) and acceptability (receiver). The sender's intentionality must be to provide information about the consumption and price of electricity in the most clear and transparent way possible (as required by law). The acceptability of the recipient is their predisposition towards the text (understood as their ability to perceive the bill as clear and coherent in its communicative purpose).

The standards focusing on the communicative situation (the context) are informativity and situationality. The informativity of the electricity bill is the new information it offers to the recipient. For informativity to be effective, the sender must keep in mind the typical recipient and their level of previous knowledge on the matter, aiming to achieve an informative balance between the known information (topic or theme) and the new information (rheme). In this case, the topic is the electricity market and its regulation, and the rheme is the consumption and price of electricity consumed in each bill. Situationality is closely linked to informativity. The relevance of the content of the bill in the context of the typical recipient is analysed. The relevance of the bill is undeniable for consumers (since it is imposed by the above-mentioned laws).

Finally, the standard of the relationship of the bill with other texts is intertextuality. It is the relationship the recipient must establish with their previous readings of similar texts to be able to interpret the text at hand. To analyse this standard, we consider the most common form of bills for the payment of goods and services in the consumer market, in contrast with the electricity bill.

2.2.2. Qualitative methodology: linguistic grammatical analysis

The formal analysis is undertaken from the perspective of Text Grammar, based on the results obtained by da Cunha and Escobar (2021). Their recommendations are organised in three categories: discourse, morphosyntactic and lexical, which is why the analysis adjusts to these three levels. Nevertheless, those three levels are unlikely to be traceable in all the textual units of the document, since it is a discontinuous text. Discourse and syntactic structures in the electricity bill are less relevant than the lexicon chosen to name each piece of information, for instance. Therefore, the analysis will especially focus on the lexical level. Where full syntactic structures appear (subject, verb, complements), the analysis is

extended to the morphosyntactic level. Finally, in the cases where a group of related syntactic structures is identified (by means of a full stop, no new paragraph; or a full stop, new paragraph), discourse analysis will be implemented. The lexical level is also analysed based on the glossary of terms of the electricity bill offered by the “CNMC” on their website. This glossary is available because the laws that introduced the 2021 bill template require this (Dirección General de Política Energética y Minas, 2021, p. 52073).

In order to analyse the text, the content of the bill is organised following these units of analysis: field, concept and value. By field we understand each section in which the information is divided (usually separated in the design by a frame), whereas the concept refers to the specific information located in each field, and the value is the specific figure that corresponds to each concept. In total, 157 units of text were analysed, of which, eight correspond to “fields”, 67 to “concepts”, and 82 to “values”. The last field of the regulated bill, portraying the “Origin and environmental impact of the consumed electricity”, was not included in the analysis because it is not described in the template of the object of study.

To collect the information, we elaborated a worksheet (Table 1) where the three levels of language are analysed and their compliance with the recommendations proposed by da Cunha and Escobar (2021) is determined. To complete the lexical analysis, we search for the expression (field, concept, or value) in the glossary of terms of the “CNMC”, when we consider that specialised terms are being used. The distinction between specialised or general terms was performed as follows: first, we used the Spanish dictionary, *Diccionario de la Lengua Española* (DLE), of the *Real Academia Española* (RAE, 2010) as the primary source to document specialised terms belonging to a specific scientific discipline or area. If the term was not in the DLE, our secondary source of reference was the *Corpus de Referencia del Español Actual* (CREA), to discern if a term is commonly used in current language. In the cases where we offer a suggestion for a new wording, we used synonyms with a much higher use rate than the original terms. To document archaic or unused terms we also used the DLE of the RAE. Lastly, to distinguish concrete words from abstract words, we use the notions of abstraction and concretion of the *Nueva Gramática de la Lengua Española* (NGLE) (2009), and the same applies if the term refers to a concrete concept in the values or fields of the bill.

The worksheet was tested in a pilot study in which all the researchers participated and from which some corrections were introduced. The data were collected using a database (Excel) whose analysis was triply revised by all the researchers from which the results were exploited and analysed.

Field/concept/value				
Text				
Analysis level	Recommendation	ID	Yes/No	Comments
Discourse	Use short sentences	D1		
	Use short paragraphs	D2		
	Use discursive connectors to link and organise ideas	D3		
	One single topic per paragraph	D4		
Morphosyntactic	Use active voice instead of passive voice	M1		
	Use the structure "subject+verb+complement"	M2		
	Avoid the abuse of subordinate clauses	M3		
	Avoid the use of gerunds	M4		
	Formulate ideas in positive rather than in negative terms	M5		
	Mention the subject of the actions	M6		
Lexical	Use common words instead of specialised terms	L1		Slang, acronyms, syntagmatic compounds and terms registered by the RAE as belonging to a specific field or discipline.
	Explain the meaning of terms if necessary	L2		In accordance with the CNMC's Glossary
	Use precise rather than ambiguous words	L3		Seeking univocity of words
	Eliminate unnecessary words	L4		
	Avoid the use of archaisms	L5		In accordance with RAE'S DLE
	Use concrete rather than abstract words	L6		In accordance with RAE'S NGLÉ

Table 1. Grammatical analysis worksheet. Source: Own elaboration based on da Cunha and Escobar (2021).

3. Results

3.1. Results and recommendations from the qualitative analysis

The analysis of text-centred standards (coherence and cohesion) shows that the knowledge of the world that is available to the typical receiver of the bill is insufficient to allow them to interpret it. This is due to the shortcomings of the standard of informativity which will be discussed below. With regard to cohesion, the sentence sequences that exist in the bill are almost non-existent, given that we are dealing with a discontinuous text. In these cases, the syntactic and semantic relationships that would achieve cohesion must be reconstructed by drawing inferences from the design of the document. However, the design does not facilitate these inferences, as Subiela Hernández et al. (2022) have shown, making it extremely difficult for the receiver to establish cohesion within this text.

The standards focusing on the sender (intentionality) and the receiver of the text (acceptability) present several problems. Intentionality fails due to the features of the text: the use of specialised terminology, the absence of syntax and other elements at the grammatical level (which will be analysed later) show that the form in which the regulated bill is written does not meet its intentionality: the electricity bill should be an informative text, since it is addressed to a non-specialised general public. However, the bills under study have certain characteristics that make them specialised texts. Regarding acceptability, the electricity bill is an unacceptable text for a large number of recipients, according to the studies performed by the “CNMC” (2016, 2021, 2022), as it does not enable them to understand the information in a clear and consistent manner. In fact, 64% of users do not know whether they have a contract with the free market or with the regulated market (CNMC, 2019, 15th November). This information is actually included in the bill.

The results of the analysis of the standards focusing on the communicative situation (context) also evince some errors. The level of informativity of the bill is low as the typical recipient lacks sufficient knowledge about the electricity market (topic or theme) and is therefore unable to fill in the interpretative gaps to understand the new information (comment or rheme) provided by the document. Moreover, lexical choices are specialised (discussed below), which, in turn, do not facilitate access to this new information either. From the point of view of situationality, the electricity bill is relevant to the context in which it is received and even essential for the consumer to be aware of what they are paying for the energy consumed. However, the inability of the typical recipient to understand the information contained in the bill has led to the total loss of the relevance of the document, as the recipient has internalised that it is a useless text.

Finally, in relation to the standard of intertextuality, the fact that the reader is not familiar with the specialisation of the text hinders its interpretation because the target audience cannot draw on their prior knowledge of other similar texts in order to understand the electricity bill. The form and content of other bills with which the recipient may be more familiar (bills for goods and services of use and consumption such as furniture, household appliances, home improvements, etc.) are very different from the electricity bill. Likewise, the various intertextual references to legislation or regulations from which the contents of the bill derive are not accessible to the typical recipient, precisely because of the characteristics of administrative legal texts, which make them “obscure” to most recipients.

This analysis through the standards of textuality evince that the main problem of the electricity bill is the lack of planning, since it was not taken into account that the potential receiver is a non-specialised reader. Similarly, it is also the result of a lack of planning not to have considered the (even legal) aim of this document: that the non-specialised reader understands the concepts invoiced in a simple and transparent way. Precisely, most guides with recommendations for clear communication and plain language (*European Commission*, 2011; *Community of Madrid*, 2017; *Prodigioso Volcán*, 2021; *Government of Aragon*, n.d.) consider that the first step in drawing up user-centred documents is planning, that is, thinking about the recipient of the document, their needs and their knowledge of the subject matter.

3.2. Results and recommendations from the quantitative analysis

The quantitative analysis of the document, from the perspective of Text Grammar, yielded the following results. The results are linked to the qualitative results, especially in terms of providing alternative wording.

At the level that we have called “field”, which corresponds to the labels or titles of the different sections of the bill, most of the recommendations on plain language are met. As mentioned in the previous section, the recommendations at the discourse level are not applicable since they are short constructions and do not constitute paragraphs. In addition, the recommendation to use connectors for linking and ordering the information (D3) is not performed by the verbal text, but by means of the design (bold, tabs and frames that organise all the information corresponding to each field). The arrangement of each one of the fields in the document also constitutes part of the organisation of the text, prioritising those placed at the top of the page. These features are characteristic of discontinuous texts and depend precisely on the design of the bill.

Similarly, at the morphosyntactic level, the analysis is not applicable: the classic structure of subject + verb + complement (M2) is not used in any case. For these reasons, the lexical level is the actual protagonist. 7 of the 8 fields identified in the regulated bill comply with the plain language recommendations for the lexicon. The exception is the field “desglose de la factura” (bill itemisation), which does not comply with the L1 recommendation. Although the verb “desglosar” (itemise) is not registered in the DLE as specialised terminology, the definition used in the bill is the fourth and last one, so we recommend replacing it with a more common

expression such as “detalle” (detail). In fact, according to the CREA, the word “desglose” has an incidence of 120 occurrences in 23 documents, while the word “detalle” offers 6086 occurrences in 2999 documents, which means that it is more commonly used.

In general, discourse and morphosyntactic analysis do not apply to 75% of the units of analysis at the concept level and, likewise, they are not applicable at the value level in any case. Therefore, the results for concepts and values are concentrated at the lexical level. In fact, the recommendation with the highest number of non-compliances is the L1, with a total of 22 texts using specialised terms instead of common words. 6 of these texts are identified as values, 15 as concepts, and one as field. This represents 14% of the total texts of the bill. In second place, the L4 recommendation accumulates 18 non-compliances, that is, 11.5%. There are also 15 non-compliances with the L6 recommendation, which is 10% of the total number of units analysed. On the other hand, the L5 recommendation is met in 100% of cases, both at the level of concept and value. The remaining results of the lexical analysis at the concept and value levels can be found in tables 2 and 3.

	L1	L2	L3	L4	L5	L6
Compliances	52 (78%)	59 (88%)	66 (98,5%)	60 (90%)	67 (100%)	58 (87%)
Non-compliances	15 (22%)	8 (12%)	1 (1,5%)	7 (10%)	0	9 (13%)
TOTAL	67 (100%)	67 (100%)	67 (100%)	67 (100%)	67 (100%)	67 (100%)

Table 2. Non-compliances with lexical recommendations at the concept level of analysis.

	L1	L2	L3	L4	L5	L6
Compliances	76 (93%)	77 (94%)	81 (99%)	71 (87%)	82 (100%)	76 (93%)
Non-compliances	6 (7%)	5 (6%)	1 (1%)	11 (13%)	0	6 (7%)
TOTAL	82 (100%)	82 (100%)	82 (100%)	82 (100%)	82 (100%)	82 (100%)

Table 3. Non-compliances with lexical recommendations at the value level of analysis.

Detailed results of the most significant non-compliances are given below.

The concept of “compensación de excedentes” (surplus compensation) does not comply with the plain language recommendations, as it uses specialised terms instead of common ones (L1) which, moreover, are not explained, either in the bill itself or in the “CNMC’s” glossary. Likewise, it does not comply with the L6 recommendation, as it is not specified what is

meant by the word “excedentes” (surplus). According to L1 and L6 recommendations, and in order to improve the standards of textuality (intentionality and acceptability in particular), this concept should be called, for instance, “descuento por energía autoproducida” (discount for self-produced energy).

Almost half of the concepts in the “datos del contrato” (details of the contract) field (6 out of 13) do not meet the plain language recommendations, especially at the lexical level. The concept “Código unificado de punto de suministro CUPS” (Unified CUPS supply point code) is particularly significant. It does not comply with the L1 recommendation because it uses a syntagmatic compound as well as acronyms (typical of specialised discourse) instead of common words. According to the CNMC’s glossary, this concept is the “Identificador unívoco de la vivienda donde se presta el suministro” (Identifier of the dwelling where the supply is provided). Although the glossary adds that it is used and needed, among other things, to change from one supply company to another, the lexicon used in the bill itself does not reveal this function. This is serious because it constitutes a barrier to switching energy suppliers, contrary to the recommendations of the European Commission by means of the CEER report (2021). In accordance with plain language recommendations, this concept could simply be referred to as “identificador de la vivienda” (dwelling identifier). Taking into account the intentionality, informativity and situationality of the text and in order to ensure its comprehension and usefulness (which is essential to switch to another supply company), another option could be “código de cambio” (switching code). Therefore, non-compliances with the L4 and L6 recommendations are also observed.

The concept “tipo de contrato” (type of contract) is clear; however, its value is expressed as an acronym (“PVPC”) which is not explained, although it is accompanied by the specification “mercado regulado” (regulated market). This acronym is considered a specialised term, therefore, this value does not comply with the L1 recommendation, but it is explained in the “CNMC’s” glossary, so it does comply with the L2 recommendation. The glossary’s explanation of the acronym also fails to comply with the L4 recommendation, as the term “Pequeño Consumidor” (Retail Consumer) is unnecessary: the regulated tariff is, by law, only for retail consumers (contracts up to 15 kW). In line with plain language recommendations, and again with the aim of improving communicative effectiveness (in the standards of intentionality, acceptability, etc.), the name of the tariff “Precio

Voluntario para el Pequeño Consumidor” (Voluntary Price for Retail Consumer) should be simplified to, for example, “Tarifa Regulada” (Regulated Tariff), so that the addition of “Mercado Regulado” (Regulated Market) could be omitted.

The concept of “Peaje de transporte y distribución” (Transmission and Distribution Tolls) is also clear, although the noun “tasa” (fee/tax) is more common and should replace “peaje” (toll), according to the CREA. The main problem lies in the value accompanying this concept, which is specified through digits and acronyms (“2.0 TD”) without any kind of clarification, thus failing to comply with the L1 recommendation. The glossary does not specify what “2.0 TD” means either (it does not comply with the L2 recommendation), it merely states that it is the name of the transmission and distribution tariff. The same applies to the concept “segmento de cargos” (charge segment) and the value that accompanies it, which are not specified either in the bill or in the “CNMC’s” glossary, making it impossible to understand them (they do not comply with the L1, L2, and L6 recommendations). Following the implementation of the current bill template in July 2021, the different distribution tariffs for retail consumers were grouped into a single tariff, called 2.0 TD. All regulated tariff users are obliged to have this modality, so its inclusion in the “Datos del Contrato” (Details of the Contract) field is not necessary (since it is inherent to the regulated tariff). The same is true for the value of the “segmento de cargos” (charge segment), which is always 1 for the 2.0TD fee. Therefore, it also fails to comply with the L4 recommendation.

Regarding the concepts “Referencia del contrato de suministro” (Reference of the supply contract) and “Referencia del contrato de acceso” (Reference of the access contract) they comply with all the recommendations from a lexical point of view, except for the L1: the use of the word “número” (number) instead of “referencia” (reference) would be more common, according to the CREA. Moreover, from the perspective of textual standards, these two concepts show the need for the consumer to have a broader prior knowledge of the electricity market (“theme”) so that they can understand the existence of two contracts with two different companies (“rheme”): the one that markets electricity (“contrato de suministro”/ supply contract) and the one in charge of its transmission and distribution (“contrato de acceso”/ access contract), which is therefore in charge of dealing with network breakdowns and emergencies. The use of these specific terms clashes with the intentionality, informativity and situationality

of the text. In accordance with these textual standards, it would be more appropriate to replace the term “referencia del contrato de acceso” (reference of the access contract) with “Número de contrato para averías y urgencias” (Contract number for breakdowns and emergencies), since that is its main function.

In the “Información de consumo eléctrico” (Information about the electricity consumption) field, the M2 recommendation is not met from a morphosyntactic point of view. The structure used includes the subject followed by a circumstantial complement, a copulative verb, and an attribute; instead of the recommended structure of subject + verb + complement. In addition, the M6 recommendation is not totally met because a syntactical subject (“el consumo”/ consumption) is introduced, instead of a semantic subject (“el consumidor”/ the consumer), who is the actual doer of the verb according to meaning, –as well as the addressee of the invoice that should be user-centred. Therefore, instead of sentences such as “su consumo en el periodo facturado ha sido xxx” (your consumption in the invoiced period has been xxx), the following structure should be used: “usted ha consumido xxx en el periodo facturado” (you have consumed xxx in the invoiced period). The same recommendation can be applied to the rest of the concepts in this field. Instead of “Su consumo medio diario en el periodo facturado ha sido de xxx” (Your average daily consumption in the invoiced period was xxx), it would be more effective to say “Usted ha consumido una media diaria de xxx” (You have consumed a daily average of xxx). At the lexical level, the L1 recommendation is met by almost all the concepts in this field, except for “energía excedentaria compensada” (compensated surplus energy), which also fails to meet the L2 and L3 recommendations. It would be more appropriate to use the term “energía autoproducida Sobrante” (excess self-produced energy). This would reduce the terminological density and, therefore, the specialisation of the text.

The concepts and values of the field “Destino del importe de la factura” (Destination of the invoice amount) comply with most of the recommendations of plain language from the grammatical approach. However, concepts such as “pagos por capacidad” (capacity payments) or “anualidades del deficit” (deficit annuities) do not comply with the L2 and L6 recommendations. In addition, acronyms that are not explained are also used, thus violating the L1 recommendation. Regarding the pragmatic analysis, understanding the content of the bill only with the information provided in it is very difficult, unless the recipient possesses a vast, prior

knowledge about the electricity market, because the necessary inferences cannot be established.

The “Desglose de la factura” (Bill itemisation) field is one of the most important for the consumer to understand what they are paying for and to compare offers. It is noteworthy that this information, very relevant according to the European Commission, is relegated to the second page of the bill. The detail of the different regulated amounts to be paid is very precise. However, the information about the cost of energy consumed is deficient. This cost, which is based on the price of energy in public auctions according to supply and demand at any given time, does not provide further details, which makes it impossible to know the real cost per kWh in each electricity time band. This circumstance has generated numerous complaints from different consumer associations, because it makes it impossible for a user of the regulated tariff to compare what they pay for the energy consumed with other options on the free market, thus contradicting one of the main demands of the European Commission stated in its Directive 2019/944. In this case, it is not a matter of recommending a clearer alternative wording, but of requesting the incorporation of this information to comply with the standards of informativity and situationality.

Beyond this anomaly, there are two concepts in this field that do not respond to the plain language recommendations. These are “Facturación por energía excedentaria del autoconsumo” (Billing for surplus energy from self-consumption) and “Ajuste límite de compensación por autoconsumo” (Compensation limit adjustment for self-consumption). Although these are two concepts that will only appear in the bills of those users who have systems for self-production of energy, they do not comply with most of the recommendations at the lexical level, since they use specialised terms (L1), are not explained in the “CNMC” glossary’s (L2) and use abstract words (L6). Once again, alternative wordings are proposed taking into account the intentionality of the text. Thus, “Facturación por energía excedentaria del autoconsumo” (billing for surplus energy from self-consumption) should be replaced, for instance, by “Compensación por energía sobrante autoproducida” (compensation for excess self-produced energy), in accordance with the provisions of Royal Decree 244/2019 of April 5, 2009. Likewise, the concept “Ajuste límite de compensación por autoconsumo” (Compensation limit adjustment for self-consumption) should be called, in coherence with its real function, “Límite a la compensación por energía sobrante autoproducida” (Compensation limit for excess self-produced energy).

The “Información para el consumidor” (Consumer information) field is the least characteristic of discontinuous texts, since it is composed of 5 paragraphs that, in general, comply with the recommendations at the discourse and morphosyntactic levels. Specialised, ambiguous or abstract terms are not identified at the lexical level. In this field, the main problems are located in the pragmatic analysis. Firstly, the regulated bill template for consumers with a social bonus (published in the Annex II of the Royal Decree) should eliminate from this field the first paragraph, which refers to the possibility for consumers with regulated tariffs to sign contracts with the free market. As indicated by the “CNMC” (2021, March 25) in its report on the regulated electricity bill template: “This information may be misleading since it is unlikely that the beneficiaries of the social bonus could choose a free market supplier and obtain a more favourable price” (p. 12). It should be noted here that the social bonus is only available for regulated tariffs, i.e., if a regulated tariff user with a social bonus changes their contract to the free market, they lose the right to the social bonus. Thus, this paragraph is not relevant to the context in which the bill will be received (vulnerable consumers), and it is, therefore, a problem of situationality.

4. Discussion and conclusions

In general, we can conclude that the regulated electricity bill template analysed has room for improvement, both from the perspective of the Text Grammar and from that of Text Linguistics. In view of the results obtained, it does not seem that the principles of plain language and the actual right to understand have been taken into account in the drafting of the regulated electricity bill template that is currently in force in Spain. In spite of the high compliance with the grammatical recommendations of plain language observed, the results of the pragmatic analysis show that the standards of textuality are not met and, therefore, reading and interpreting the content of the bill in context fails due to a clear lack of textual planning.

These results demonstrate the need for methodological triangulations when it comes to analysing texts. A first interpretation of the quantitative results might suggest that the text analysed largely complies with the plain language recommendations, as the percentage of non-compliance is low. However, we should contrast these results with those obtained through the qualitative analysis, which reveal the serious deficiencies of the text.

The application of the recommendations offered in this work would enable us to make the text more acceptable to receivers and, therefore, to recover its relevance (in terms of situationality) as an essential text for understanding and optimising electricity consumption and its costs, comparing offers and switching suppliers if necessary, in line with the demands of the European Commission (EU Directive 2019/944, CEER report, recommendations on periodic electricity bill, etc.).

To achieve this objective, it is a priority to rethink (and replan) the document by putting the target reader at the centre and shifting the complexities of the market to the side. It is necessary to reduce the specialisation level of the text and adapt it to an informative register that, if possible, emulates the format and language used in other types of invoices with which the typical receiver is more familiar (in order to meet the requirements of the standard of intertextuality). This conclusion, the outcome of the qualitative analysis, is also endorsed by the results of the formal analysis: an important part of the grammatical recommendations goes in the direction of simplifying the syntax and, especially, the lexicon, that is: of making the text more informative.

Perhaps a misinterpreted commitment to transparency is one of the reasons causing the low levels of understanding of the current bill. As this study has shown, many concepts incorporated in the text could be eliminated without producing any potential harm to the typical recipient's right to understand, since it is not within the recipient's power to do anything to change them. For instance: concepts such as "peaje de transporte y distribución" (transmission and distribution tolls) and "segmento de cargos" (charge segment) have unique and mandatory (unchangeable) values for domestic consumers in the current bill template. In fact, their presence in the bill is contrary to the CEER's recommendation (2021, p. 27), "about the need to prioritise and reduce content in order to make the bill consumer friendly".

However, this drive for transparency is missing in the absence of an itemisation of energy costs. Reference has already been made to the seriousness of this circumstance throughout the text, but these conclusions cannot be closed without demanding the urgent need for the cost per kWh for each invoicing band to be detailed. If the bill is to be used to compare offers, as demanded by the European Commission, this information must be included without any excuses.

It has been observed that the names of certain concepts seem to hide their real function, making it difficult for the consumer to understand their

meanings. For example, the concept “Ajuste límite de compensación por autoconsumo” (Compensation limit adjustment for self-consumption) hides the fact that it is a limit on the sale of self-produced energy that has not been consumed, so that the bills never become positive for the consumer, i.e. generating income for the consumer due to the fact that more energy has been fed into the grid than has been consumed. Something similar can be said about the “Código Unificado de Punto de Suministro CUPS” (Unified Supply Point Code CUPS), whose main utility (the change of supply company) is diluted behind the selected lexicon.

Finally, it is remarkable that the references to the free market have not been eliminated from the regulated bill template for users with a social bonus, contrary to what the CNMC itself requested in their report. It is an indispensable condition to apply for the social bonus to be on the regulated market, which means that, from a pragmatic point of view, the free market option should not be mentioned for these users.

It is important to highlight that a bill written in plain language alone cannot solve the high levels of incomprehension generated by this document. This analysis has evinced the complexity of the electricity market and the need for consumers to have a better understanding of it, as they are not specialised recipients. This educational effort is necessary so that the information contained in the bill (rheme) can be interpreted in context from a frame of reference (theme) that allows the necessary inferences to be made. With a better knowledge of the “theme” or topic, the target reader would be able to fill in the interpretative gaps the bill (rheme) poses. This would not only allow the reader to interpret the bill in a congruent way, but it would also help to achieve a better informative balance in its interpretation, as it would greatly reduce the knowledge that the reader is ignorant of.

This analysis has not addressed the way in which information on the origin of electricity and its environmental impact is provided on the bill. However, the documentation phase has revealed that, although the national energy mix combines clean and polluting sources, only consumers in the free market can opt for 100% clean energy suppliers, while regulated tariff users are doomed to assume their energy is more polluting than the national average. Beyond the regulations, this circumstance deserves a study from the point of view of its coverage by the media.

Acknowledgements

This paper was funded by the project PMAFI-02/21 of the programme of financial aid for group research investigation projects at the Catholic University of Murcia. Project start: 14th of December, 2021. Project end: 14th of June, 2024.

Article history:

Received 9 January 2023

Received in revised form 13 April 2023

Accepted 14 April 2023

References

- Alsina Naudi, A. (2018). Endeavours towards a plain legal language: The case of Spanish in context. *International Journal of Legal Discourse*, 3(2), 235-268. <https://doi.org/10.1515/ijld-2018-2010>
- Álvarez, M. (2000). *Tipos de escrito II: Exposición y argumentación*. Arco Libros.
- Beaugrande, R. A., & Dressler, W. (1981). *Introduction to text linguistics*. Longman.
- Bichsel, J., Kunz, D., Padey, P., Citherlet, S., Eicher, S., Cellina, F., Castri R., Uros, T., & Carabias, V. (2019). Enhancing demand-side energy reduction through informative billing strategies. *Journal of Physics: conference Series*, 1343(012144). <https://doi.org/10.1088/1742-6596/1343/1/012144>
- Cabré Castellví, M. T. (2002). Textos especializados y unidades de conocimiento: metodología y tipologización. In J. García Palacios & M. T. Fuentes Morán (Eds.), *Texto, terminología y traducción* (pp. 15-36). Almar.
- Cartwright, W. (2015). Rethinking the definition of the word 'map': An evaluation of Beck's representation of the London Underground through a qualitative expert survey. *International Journal of Digital Earth*, 8(7), 522-537. <https://doi.org/10.1080/17538947.2014.923942>
- Casado Velarde, M. (1993). *Introducción a la gramática del texto en español*. Arco Libros.
- Casas Sánchez, M. C., Martínez Rivera, T., Tamayo Duque, A. C., & Villa Acevedo, G. A. (2018). Los textos discontinuos: una posibilidad didáctica para favorecer la interpretación. *Ciencias Sociales y Educación*, 7(14), 85-107. <https://doi.org/10.22395/csye.v7n14a5>
- Cassany, D. (2005). Plain Language in Spain. *Clarity, Journal of the International Association Promoting Plain Legal Language*, 53, 41-44. <http://hdl.handle.net/10230/22467>
- CEER = Council of European Energy Regulators (2021, March 23). *CEER Report on Billing Issues in the Clean Energy for All Europeans Package*. <https://www.ceer.eu/documents/104400/-/5f7bcb34-ae39-086d-58b3-5fd0cec4039>
- CNMC = Comisión Nacional del Mercado y la Competencia (2016, May 13). *Casi la mitad de los usuarios no entiende su factura de la luz*. <https://www.cnmc.es/casi-la-mitad-de-los-usuarios-no-entiende-su-factura-de-la-luz-232176>
- CNMC = Comisión Nacional del Mercado y la Competencia (2019, November 13). *Panel Hogares CNMC: 3 de cada 5 hogares desconocen si su compañía eléctrica es del mercado libre o regulado*. <https://blog.cnmc.es/2019/11/15/panel-hogares-cnmc-electricidad-gas/>
- CNMC = Comisión Nacional del Mercado y la Competencia (2021, December 3). *Los datos del Panel de Hogares analizan el conocimiento de la contratación del suministro energético*. <https://www.cnmc.es/prensa/panel-conocimiento-energia-20211203>
- CNMC = Comisión Nacional del Mercado y la Competencia (2021, March 25). *Informe sobre la propuesta de resolución por la que se establece el contenido mínimo y el modelo de factura de electricidad*. <https://www.cnmc.es/expedientes/infde03021>
- CNMC = Comisión Nacional del Mercado y la Competencia (2022, May 13). *Electricidad y gas natural, los servicios peor valorados por los hogares españoles*. <https://www.cnmc.es/prensa/panel-de-hogares-satisfaccion-servicios-4t-20220513>

- CNMC = Comisión Nacional del Mercado y la Competencia (2022, October 13). *Boletín de indicadores eléctricos*. <https://www.cnmc.es/expedientes/isde01222>
- Comunidad de Madrid (2019). *Guía de comunicación clara. Pautas para aplicar a los trámites de la Comunidad de Madrid*. <https://www.comunidad.madrid/servicios/informacion-atencion-ciudadano/comunicacion-clara>
- CREA = Real Academia Española. Banco de datos (CREA). *Corpus de referencia del español actual*. <http://www.rae.es>
- da Cunha, I., & Escobar, M. A. (2021). Recomendaciones sobre lenguaje claro en español en el ámbito jurídico-administrativo: análisis y clasificación. *Pragmalingüística*, 29, 129-148. <https://doi.org/10.25267/Pragmalinguistica.2021.i29.07>
- Dirección General de Política Energética y Minas (2021, April 28). *Resolución de 28 de abril de 2021 por la que se establece el contenido mínimo y el modelo de factura de electricidad a utilizar por los comercializadores de referencia*. Boletín Oficial del Estado (BOE).
- DLE= Real Academia Española (2010). *Diccionario de la lengua española*. 23.^a ed. <https://dle.rae.es>
- DPD = Real Academia Española & Asociación de Academias de la Lengua Española (2005): *Diccionario panhispánico de dudas*. Santillana Ediciones Generales.
- Durán, N. (2019). Estrategias pedagógicas para el desarrollo de la lectura inferencial. *Educación y Ciencia*, 23, 367-382. <https://doi.org/10.19053/0120-7105.ecy.2019.23.e10304>
- European Commission (n.d.). *Sample energy bills*. European Commission's web site. Retrieved September 6, 2022, from https://commission.europa.eu/live-work-travel-eu/consumer-rights-and-complaints/energy/energy-supply-policy-information_es
- European Commission, Consumers, Health, Agriculture and Food Executive Agency. (2018) *Consumer study on Pre-contractual information and billing in the energy market - improved clarity and comparability: final report*. Publications Office. <https://data.europa.eu/doi/10.2818/770778>
- European Commission, Directorate-General for Translation (2015). *How to write clearly*. Publications Office of the European Union. <https://op.europa.eu/en/publication-detail/-/publication/725b7eb0-d92e-11e5-8fea-01aa75ed71a1>
- European Parliament (2009, July 13). *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*. Official Journal of the European Union. <http://data.europa.eu/eli/dir/2009/72/oj>
- European Parliament (2019, June 5). *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*. Official Journal of the European Union. <https://eur-lex.europa.eu/eli/dir/2019/944/oj>
- Gobierno de Aragón (2020). *Manual de estilo de lenguaje claro. Criterios para la redacción de textos claros en internet*. <https://www.aragon.es/-/comunicacion-y-lenguaje-claro-en-el-portal-de-servicios-del-gobierno-de-aragon>
- Hlaing, K.M., & Nyaung, D.E. (2019). Electricity billing system using Etherreum and Firebase. *International Conference on Advanced Information Technologies (ICAIT)*, 217-221. <https://doi.org/10.1109/AITC.2019.8920931>
- [https://www.boe.es/eli/es/res/2021/04/28/\(1\)](https://www.boe.es/eli/es/res/2021/04/28/(1))
- IPLF = International Plain Language Federation (n.d.). *What is plain language*. IPLF web site. Retrieved September 6, 2022 from <https://www.ipfederation.org/plain-language/>
- Marazzato Sparano, R. (2018). Lenguaje claro, traducción e idiosincrasias del idioma. Aportes para la comprensión lectora. *Orientación y Sociedad*, 18(2), 163-177.
- Ministerio para la Transición Ecológica (2019, April 5). *Real Decreto 244/2019, de 5 de abril, por el que se regulan las condiciones administrativas, técnicas y económicas del autoconsumo de energía eléctrica*. Boletín Oficial del Estado (BOE). <https://www.boe.es/eli/es/rd/2019/04/05/244>
- Montolío, E. (2012). La modernización del discurso jurídico español impulsada por el Ministerio de Justicia. Presentación y principales aportaciones del Informe sobre el lenguaje escrito. *Revista de Llengua i Dret*, 57, 95-121. <http://revistes.eapc.gencat.cat/index.php/rld/article/view/2426/n57-montolio-es.pdf>
- Montolío, E. (2019). La clarificación del discurso judicial. Estado de la cuestión y propuestas lingüísticas de optimización. *Revista del Ministerio Fiscal*, 8, 72-95. <https://www.fiscal.es/documents/20142/b35363a9-d8ad-c67c-0867-ab068a10762e>
- Montolío, E., & Tascón, M. (2020). *El derecho a entender. La comunicación clara, la mejor defensa de la ciudadanía*. Catarata.

Nour, M., Chaves-Ávila, J. P., & Sánchez-Mirallas, Á. (2022). Review of Blockchain Potential Applications in the Electricity Sector and Challenges for Large Scale Adoption. *IEEE Access*, 10, 47384-47418. <https://doi.org/10.1109/ACCESS.2022.3171227>.

NGLE = Real Academia Española y Asociación de Academias de la Lengua Española (2009): *Nueva gramática de la lengua española*. Espasa.

OCU = Organisation of Consumers and Users (2022, October 21). *Cómo descifrar la factura de la luz*. <https://www.ocu.org/vivienda-y-energia/gas-luz/consejos/como-descifrar-la-factura-de-la-luz>

OECD = Organisation for Economic Co-operation and Development (2010). *PISA 2009 results: what students know and can do. Student performance in reading, mathematics and science*. OECD. <https://doi.org/10.1787/9789264091450-en>

Pacios, A.-R., Vianello-Osti, M., & Rodríguez-Bravo, B. (2016). Transparency and access to information on research projects in Spanish public universities. *Profesional de la información*, 25(5), 721-729. <https://doi.org/10.3145/epi.2016.sep.02>

Prodigioso Volcán (2021). *El derecho a entender. Comunicación clara*. Prodigioso Volcán. <https://www.prodigiosovolcan.com/pv/comunicacion/assets/ComunicacionClara.pdf>

Subiela Hernández, B. J., Miralles González-Conde, M. A., & Sánchez Hervás, D. (2019). Propuesta de diseño claro y transparente para la factura eléctrica regulada en España. *Grafica-Journal of Graphic Design*, 7(13), 11-20. <https://doi.org/10.5565/rev/grafica.125>

Subiela Hernández, B. J., Sánchez Hervás, D., & Miralles González-Conde, M. A. (2022). El derecho a entender en la nueva factura eléctrica regulada en España: análisis desde el punto de vista del diseño. *Revista Española de la Transparencia*, 14, 101-130. <https://doi.org/10.51915/ret.199>

Vilches, F., & Sarmiento, R. (2011). *Manual de lenguaje jurídico-administrativo*. Dykinson.

Vössing, J., Stamov-Roßnagel, C., & Heinitz, K. (2017). Text difficulty affects metacomprehension accuracy and knowledge test performance in text learning. *Journal of Computer Assisted Learning*, 33(3), 282-291. <https://doi.org/10.1111/jcal.12179>

Blas-José Subiela-Hernández is a professor and researcher at Universidad Católica de Murcia (UCAM). Graduate in Information Sciences (Advertising and Public Relations branch) from CEU San Pablo (Valencia) and PhD in Communication from UCAM. His research focuses on graphic design, clear communication and citizens' right to understand. He is currently leading a research project to improve the understanding of the regulated electricity bill in ADPURE Research Group.

Alba María Gálvez-Vidal is a professor and researcher at Universidad Católica de Murcia (UCAM). Graduate in Translation and Interpreting and PhD in Arts and Humanities from Universidad de Murcia, she has a master's degree in European Comparative Literature from the same university, as well as a master's degree in Secondary School Training by UCAM. Her lines of research include discourse analysis, phraseology, and literature and its translation.

María Ascensión Miralles González-Conde is a professor and researcher at Universidad Católica de Murcia (UCAM). Graduate in Information Sciences (Advertising and Public Relations branch) from Universidad Complutense de Madrid (UCM) and PhD in Communication from UCAM.

She is specialized in Creativity in Communication and Advertising Strategies, she belongs to ADPURE Research Group with which she investigates how both graphic design and structure and writing of texts affect comprehension, in order to provide criteria that encourage public and private institutions to respect citizens' right to understand.

NOTES

¹ Available in https://commission.europa.eu/live-work-travel-eu/consumer-rights-and-complaints/energy/energy-supply-policy-information_es

² Both templates can be compared in their respective publications in the Boletín Oficial del Estado. The most relevant change is the addition of the time bands in the 2021 template. The other contents remain unchanged.