



CEER Consultation “Retail market design, with a focus on supplier switching and billing”

Question 1: The supplier should be the main point of contact for the customer.

Comment

In Europe different customer interface models are realised. Each of these models has its pro and cons. In the consultation paper the supplier centric model is recommended. However, a cost benefit analysis including all costs and benefits for all market participants which should be the basis for such recommendations is missing. Before recommending a certain customer interface model all market processes have to be analysed not only two. A fully harmonised model for the whole Europe is very likely not to be needed.

Question 2: The contract should always be offered to the customer in written form.

Agree

Secure and signed electronic contract should also be taken into consideration.

Question 3: A switch should be executed within less than three weeks. The switch should be executed within:

- a) Under 1 week***
- b) 1 week***
- c) 2 weeks***
- d) Other, please explain. X***

The period required for switching basically depends on the IT system used by the market participants (suppliers, DSO and customers). Since it differs from country to country, it is not recommended to change the 3 weeks period. It takes quite sometime to exchange necessary switching information of a customer between new supplier, DSO and old supplier due to different data storage.

Question 4: A switch should be possible any day of the week.

Disagree

The initiation of a switch could happen any day during a week. However the operational switch date depends on contractual agreements and restrictions. Therefore a switch within three weeks at an appointed date, e.g. beginning of the month, seems to be most appropriate.

Question 5: There should be a regulated framework for meter value management, meaning a standardised electronic format and timetables for data exchange.

Agree

Question 6: The supplier should give information on the offers in a clear and concise manner.

Agree



Every supplier should have the possibility to design his contracts individually.

Question 7: The number of possibilities to stop a switch from proceeding should be very limited. Which stakeholder should be able to stop a switch?

- a. Customer yes
- b. Old supplier yes (e.g. contractual obligations)
- c. DSO yes
- d. Other new supplier

Question 8: Information on how to make an enquiry and on how to launch a complaint specifically regarding switching should be clearly displayed on the contract with the new supplier.

Agree

Every supplier should have the possibility to design his contracts individually.

Question 9: The supplier should always be the first point of contact for questions regarding switching.

Agree

Question 10: The supplier should be the main point of contact for the customer when moving in or moving out.

Agree

Question 11: Combined billing provided by the supplier should be the standard.

Comment

Combined billing can be standard but not mandatory. There shall be a choice for the market participants. However, if combined billing is provided by the supplier, it must be guaranteed that there are no financial risks for the DSO.

Question 12: The final bill should be sent out by the old supplier within less than six weeks:

- a) Less than one week
- b) Less than two weeks
- c) Less than three weeks
- d) Other

This also depends on the IT system. There is no stricter regulation required. Normally companies send their bills as soon as possible to collect their money, as this is in the interest of the old supplier.

Question 13: When advanced payment is used, the customer should be clearly informed about the methodology used to calculate the advance payment

Agree



Question 14: The customer should be offered different payment methods including payment methods which can be easily accessible to vulnerable customers

Disagree X

There could be a specific payment method for a specific trading offer. To manage vulnerable customers is a different thing.

Question 15: The customer should always have a choice in the frequency for billing

Agree X

The customer shall not have unlimited choices. Choices should be economically reasonable.

Question 16: The supplier should always be the first point of contact for issues regarding the bill.

Agree

Disagree

The first point of contact depends on the billing process. The party that sends the bill shall be the first point of contact.

Question 17: Information on making an enquiry or launching a complaint specifically about the content of the bill should be clearly displayed on the bill.

Agree X