

Fra: MyCEER [mailto:webmaster@energy-regulators.eu] **Sendt:** 16. september 2011 13:55 **Til:** Kristin H. Lind
Emne: MyCEER - questionnaire update: RMF TF - Retail Market Design - PC-00-KSNOE-I

Dear user of MyCEER!

The questionnaire **RMF TF - Retail Market Design** was edited on 2011-09-16 at 13:54:38 CET by the user PC-00-KSNOE-I as follows:

General Information Details of Respondent *Last Name* Lind

Organisation/Company Norwegian Association of Local and Regional Authorities (KS Bedrift Energi) and Norwegian Regional Energy Association (DEFO) *Phone* +4791603694

E-mail address kristin.lind@ks.no

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

Answer Disagree

Please, give your comment (maximum of 200 words) It is of course possible to let the supplier be the first contact point. And that the customers call/letter is transferred to the DSO when it comes to questions about the grid. We think that the DSO should have a more central role in the future electricity market. There are several issues related to the network that we find difficult to believe that the supplier will have the right incentives/competence to answer. To customers it will appear more natural and logical to seek help nearby when they have problems or questions with the grid, than to contact the supplier who might be located in a different country than that of own residence. We don't think the proposal contributes to build customers trust. We also have experience from the Norwegian market that taxes are better handled by the DSO. Therefore we strongly feel that it should be carried out a cost-benefit analysis on the different roles for the market actors, up till now we cannot say that we have seen one that has been done thoroughly. We think that these questions should be discussed when taking into consideration the regulation of the suppliers and the DSOs.

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

Answer Agree

Please, give your comment (maximum of 200 words) Recording to the Norwegian experiences it is of outmost importance that the contract is offered in written form. Otherwise there will be players in the market that tries to swindle the customers.

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

Answer 2weeks

If you choose answer "other" please, explain (maximum 200 words): We think that the customer should have the opportunity to regret his/hers decision. The Norwegian legislation says that the customer can regret within 14 days. Technically it is possible to have a shorter limit for how soon the switch should be executed.

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

Answer Agree

Please, give your comment (maximum of 200 words) Technically there is no problem with a switch taking place any day of the week.

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

Answer Agree

Please, give your comment (maximum of 200 words) A regulated framework with a standardized electronic format and timetables would contribute to making the costs low. We think that it can also contribute to the diversity amongst the suppliers, because the threshold to start up will be easier.

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

Answer Agree *Please, give your comment (maximum of 200 words)* Anything else would make the customers trust worse.

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

Answer Customer

Please, specify under which circumstances you believe that a switch can be stopped (maximum of 200 words): Taking it for granted that the switch itself is done in a correct way, we think that the customer alone, or by someone that he wants to be represented by, should be able to stop a switch.

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.

Answer Agree *Please, give your comment (maximum of 200 words)* This will build customer trust and maybe also

greater customer engagement.

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

Answer Agree

Please, give your comment (maximum of 200 words) The supplier might be the primary contact and responsible for questions regarding switching. But there could also be that the customer should have access to neutral institutions that can provide advice. This, in fact, is a role that the DSO could have.

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

Answer Disagree

Please, give your comment (maximum of 200 words) With the introduction of AMR it is a wish from the DSOs that the customer's decision on moving in/out is in the hands of the DSO as soon as possible. It is possible that AMR will be used to connect/disconnect the customer, regarding to the request from the customer. This should be looked more into.

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

Answer Disagree

Please, give your comment (maximum of 200 words) Combined billing should only be possible if the DSO finds that it serves the customer and the DSO. In that case the DSO has confidence in the supplier. We do not agree that the supplier has full billing obligations, because of the financial risk involved for the DSO. It is also important that the issuer is able to answer questions regarding the bill, this also strengthens the customer's trust. The DSO is the right stakeholder to answer questions regarding to the invoice of network services. If we look into the close future we think that bills on paper and in envelope are history. We are sure that the billing information will have to be distributed in a format that easy can be presented on a screen, and therefore it is possible that the information from the supplier and DSO very well can be sent separately to the customer. This should be looked more into.

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

Answer Less than three weeks Please, give your comment, if needed (maximum of 200 words) Three weeks should be enough.

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

Answer Agree Please, give your comment (maximum of 200 words) Anything else would not contribute to make the customer's trust better.

14. The customer should be offered different payment methods, including at least one payment method which is easily accessible for the customer.

Answer Agree Please, give your comment (maximum of 200 words) These would make the customer's trust better, and maybe also contribute to greater customer's engagement.

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

Answer Agree

Please, give your comment (maximum of 200 words) As for the former question, this will contribute to better trust and greater customer's engagement. This will also contribute to reduce the supplier's and DSOs risk of not getting the revenue from the customer's.

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

Answer Disagree

Please, give your comment (maximum of 200 words) Invoice Issuer must be able to answer all questions from the customer regarding the bill. If the supplier can answer grid questions, it can be done, otherwise it is not a good idea. Our answer to Q 11 can be held here too, and therefore the customer can have both the DSO and the supplier as a contact point regarding to different question about the bills.

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

Answer Agree Please, give your comment (maximum of 200 words) These would make the customer's trust better, and we think also contribute to greater customer's engagement.

General questions to the CEER public consultation: Do you agree to the proposed recommendations?

Answer We agree to some of the technical recommendations. But we do not agree to the supplier centric model. We think there are still a lot of unanswered questions when it comes to what impact this

will have to the electricity market and the customer's behavior.

Do you believe that we have pinpointed the relevant roles and responsibilities with regards to switching, moving and billing?

Answer No. We also think that it should be looked into on how customer trust and customer engagement are in those eleven countries with a supplier centric model.

Have we chosen the most important factors that need to be addressed for stakeholders ? including the customers ? to bring the full benefits of the retail market model?

Answer We think that it is important to look into the role of the DSOs in the future and take into account the development of smart grid and services, taking regard to the opportunities this gives the electricity market. The focus should be on the services that customers will ask for in the future.

Do you have any other relevant comments to provide?

Answer As we have said before, there are still questions and important factors that have to be looked more closely into. Regarding to energy efficiency and how to reach these targets, the DSOs will have to play an important role in the future, and also be in contact with the customers.