

ELEXON Response to the CEER consultation "Retail market design, with a focus on supplier switching and billing"

The consultation required a response to be made into an online questionnaire, with constraints on how the answers could be formatted, so this ELEXON response document does not take the usual form of one of our consultation responses.

The consultation document and online questionnaire can be found at [Retail market design](#).

The square bracketed text below was not included in our answers in the online questionnaire, but is included here to give some context to the questions or indicate that we left the response blank.

Sarah Jones, 8 September 2011

Q1 – Do you agree that the supplier should be the main point of contact for the customer?
[no comment]

Q2 – Do you agree that the contract should always be offered to the customer in written form? [no comment]

Q3 – 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.

ELEXON Ltd delivers the centrally-mandated electricity settlement services that are critical to the successful operation of Great Britain's electricity trading arrangements under the Balancing and Settlement Code (BSC). We manage processes and systems from electricity meter to bank, interacting with over 200 companies in the electricity industry.

We believe that suppliers are best placed to respond on the impact of reducing lead time for switching. However, we can confirm that there are no GB BSC requirements that would prevent customers from changing their electricity Supplier within one week.

Q4 – Do you agree that a switch should be possible any day of the week?

There are no GB BSC requirements that would prevent a switch on a non working day. However, it may be necessary for some of the processing to be carried out during working days. Therefore the lead time required for switching should include at least one working day.

Q5 – Do you agree that there should be a regulated framework for meter value management, meaning a standardised electronic format and timetables for data exchange?

Yes, in GB, we already have a standardised electronic format and timetables for data exchange. Under the GB model the meter operator and/or distributor are not responsible for meter reading. This is carried out by a supplier agent, the data collector. The GB Balancing and Settlement Code (BSC), that ELEXON administers, contains high level rules for data collectors and suppliers relating to the collection of metered data and specifically the settlement requirements for the change of supplier process. Lower level BSC Procedures set out the specific flows which should be sent between suppliers and their agents and the timescales when these should be sent. The majority of flows are transmitted via the dedicated Data Transfer Network and are based on standard flow formats. These flows are detailed in the Data Transfer Catalogue.

Q6 – Do you agree the supplier should give information on the offers in a clear and concise manner? [no comment]

Q7 – 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
- b. Old supplier
- c. DSO
- d. Other

Suppliers and customers are best placed to respond to the question on who should be able to stop a switch. At present the GB arrangements allow 5 working days for the current Supplier to object to a registration request from a new Supplier. The grounds by which a supplier can raise an objection are set out in the GB Electricity Supply Licence.

If an objection is raised, the new supplier's registration will be terminated, unless the current supplier withdraws the objection. This allows erroneous registrations to be highlighted and rectified before the customer actually changes supplier.

Q8 – Do you agree that 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? [no comment]

Q9 – Do you agree that the supplier should always be the first point of contact for questions regarding switching? [no comment]

Q10 – Do you agree that the supplier should be the main point of contact for the customer when moving in or moving out? [no comment]

Q11 – Do you agree that combined billing provided by the supplier should be standard? [no comment]

Q12 – Do you agree that the final bill should be sent out by the old supplier within less than six weeks? [no comment]

Q13 – Do you agree that when advanced payment is used, the customer should be clearly informed about the methodology used to calculate the advance payment? [no comment]

Q14 – Do you agree that the customer should be offered different payment methods including payment methods which can be easily accessible to vulnerable customers? [no comment]

Q15 – Do you agree that the customer should always have a choice in the frequency for billing? [no comment]

Q16 – Do you agree that the supplier should always be the first point of contact for issues regarding the bill? [no comment]

Q17 – Do you agree that information on making an enquiry or launching a complaint specifically about the content of the bill should be clearly displayed on the bill? [no comment]