



**CEER Draft**  
**Retail market design, with a focus on**  
**supplier switching and billing**  
**Draft Guidelines of Good Practice**  
**C11-RMF-31-05**

*Milan, the 14<sup>TH</sup> of September 2011*

Anigas, the **National Association of the Gas Industry**, represents all the companies, regardless of their constitution, that are engaged in any one or more of the following activities: storage, transportation, distribution, sale of natural gas on the consumer market, wholesale, trading and regasification of liquefied natural gas.

The Association **was founded on May 9, 1946** as ANIG, and has, since then, been a member of Confindustria (Confederazione Generale dell'Industria Italiana). Since its inception, the main objective has been to protect and support the interests of member companies, conduct labor union activities, promote and foster understanding and create consensus on economic aspects.

Roughly **70** companies are represented within Anigas, which has a **workforce of 11,000** employees. Among the members are the largest industry players, as well as small and medium-sized companies, which together represent more than 60% of the Italian gas market.

Member companies distribute **over 50 billion cubic meters** of gas each year for public use, small crafts, commercial and industrial applications.

The same member companies that serve **10 million customers** throughout Italy are present in **more than 4,000** municipalities both large and small, including several provincial capitals such as Rome, Naples, Turin, Florence, Taranto, Venice, Piacenza, Rimini and Avellino.

## INTRODUCTION

Anigas submits its comments to the draft guidelines of Good Practice proposed by Council of European Energy Regulators (CEER) in the Document (C11-RMF-31-05) “Retail market design, with a focus on supplier switching and billing.

## GENERAL COMMENTS

Anigas welcomes this CEER’s public consultation that has purpose to provide suggestions for Guidelines of Good Practice on retail market design, with a focus on supplier switching and billing for both electricity and gas.

## RESPONSES TO THE QUESTIONS

### Chapter 2 : Retail market model design

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

Anigas: **agree**

#### **Comment:**

Anigas agrees that the supplier is the standard interface for the customer in the switching process; concerning to billing the supplier is the main point of contact. However in some cases the DSO should have a customer interface for: safety problems, network failures, new connections, connection modifications, checkup of installations, and for questions with respect to the network connection. The customer must be informed who his DSO is, and how to contact him, especially in case of an emergency. The customer must know the emergency number of his DSO.

### **Chapter 3 : Supplier switching**

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

Anigas: **agree**

**Comment:**

Anigas agrees with CEER that contracting should be possible electronically and through other means. Regarding the useful information list, Anigas doesn't understand why this information should be needed to switch.

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

Anigas: **other**

**Comment:**

Anigas considers it essential that should be clarified such as the phases of the process of switching should be carried out the 3 weeks period of time provided for in Directive 2009/73/CE.

The Italian NRA already provides that the switch will be effective from the 1<sup>st</sup> day of the month following the month in which the DSO has received the supplier request). This time is necessary to perform all the phases of the switching process that involves the DSO, old and new supplier and the final customer.

It also notes that the consumer protection laws afford customers a period of time (30 days) in which they can back out of a contract (*regret period*).

In any case Anigas believes that switching period should start from the successful transfer of all the relevant data for the switch by the new supplier to the DSO.

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

Anigas: **disagree**

**Comment:**

the start of a switch is possible any day. Making a switch effective is, however, best done on defined dates (e.g. the first day of the month following the month in which it is received by the on request). How much minimum advance notice has to be given by the customer (3 weeks or less) will depend on legal and technical requirements in the respective gas market system.

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

Anigas: **agree**

**Comment:**

the standardized electronic format should be a part of the complete switching process.

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

Anigas: **agree**

**Comment:**

the information to the customer should also be complete.

**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?**

Anigas: **Other**

**Comment:**

the new supplier should be able to cancel a switch in the case where it is a customer does not comply with the payments

**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.**

Anigas: **Agree**

**Comment:** no comments

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

Anigas: **Agree**

**Comment:**

the new supplier should be the only point of contact regarding questions about the supplier switching process.

### **Moving**

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

Anigas: **Agree**

**Comment:**

as stated before, Anigas opinion is that supplier should be the major point of contact for the customers

### **Chapter 4: Billing**

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

Anigas: **Agree**

**Comment:**

in a supplier-centric model, customers shall receive a single combined bill for both commodity and grid cost components.

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

Anigas: **Other**

**Comment:**

transmission time for final bill depends on the availability of switching meter value. The maximum period should be 6 weeks according to the 3<sup>th</sup> Package Energy requirements.

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

Anigas: **Agree**

**Comment:** no comments

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

Anigas: **Agree**

**Comment:** no comments

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

Anigas: **Agree**

**Comment:**

according to the commercial contracts, customers should always have a choice in the frequency of billing; the agreement between the supplier and the customer shall not influence the DSO's cash flow.

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

Anigas: **Agree**

**Comment:**

as stated before, Anigas believes that supplier should be the major point of contact for the customers.

***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.***

Anigas: **Agree**

**Comment:** no comments