



(European forum for energy business Information eXchange)

Comments on ERGEG Best Practice Proposition for Public Consultation

**(E05-CFG-03-05: “Supplier Switching
Process”)**



- The ebIX models were based upon a business role model, developed in collaboration with ETSO (www.etso-net.org) and supported by EFET (www.efet.org).
- Therefore, ebIX is pleased to notice that ERGEG also supports the principle of using clearly defined business roles (paragraphs 12, 14). ebIX suggests that the harmonised ebIX/ETSO/EFET role model be used as a basis for naming and definitions in the European market (www.edi.etso-net.org/role/download-role.html)
- **Paragraph 3:**
 - The ebIX-models do not make any difference between different kinds of supplier switches nor moves as all suppliers should be treated on an equal basis (however, special national additional procedures might be in effect for processes concerning switches to and from default and last resort supplier roles).
 - Consequently, whereas ebIX understands the focus on the “incumbent” supplier (and “alternative” supplier), these roles are not part of the role model and thus not part of the ebIX process models.
 - Also statistics for re-switches and switchbacks will have to be derived from the metering point administrators (see paragraph 13) data base.
 - Also great care has to be taken in defining the business processes to be designed in the liberalised market. Due to the liberalisation, all ‘older’ business processes (move, change of meter,...) have to be reviewed and new ones (change of metered data responsible) besides the ‘Supplier switch’ have to be designed.
- **Paragraphs 7 and 8:**

We refer to the goals of ebIX to design models which can be used by all countries in the European market. ebIX offers its knowledge both in implementation and modelling issues.
- **Paragraph 8:**

We would like to stress that ebIX models for the retail market include both gas and electricity with relatively minor differences.
- **Paragraph 9:**

ebIX always aims for maximum simplicity when designing switching processes. ebIX thinks that this is the best guarantee for achieving easy and cost efficient procedures.
- **Paragraphs 12 and 13:**

ebIX has come to the conclusion that in most countries the DSO plays many roles and that defining these roles is fundamental. As the market evolves (e.g. liberalisation of the metering market) it is essential to design processes on the basis of these roles (e.g. metering point administrator) and not the companies, or types of companies, which do play many roles.



- **Paragraph 13:**

- ebIX has identified the 'mediator' role as 'metering point administrator', a role which will currently indeed often be played by DSOs or a joint venture of them.
- Clear definitions are indeed essential, also for the processes to be designed.

- **Paragraph 17:**

The frameworks of ebIX which are already partially implemented in ebIX countries are available for other countries as well.

- **Paragraph 19:**

The unique identification number for every metering point is central to all ebIX work and it was so from the beginning (it was introduced by its predecessor EDIEL from the Nordic countries).

- **Paragraph 21:**

The ebIX framework allows for electronic and efficient switching with no inherent limitation on the switching speed.

- In addition, our experience shows that the need for data quality and clear responsibility thereof is much more accentuated in a liberalised market where data is maintained at different places. Previous experience in many countries has shown that the data quality available before deregulation will normally not be good enough for a smooth transition. An important tool in the implementation phase is a testing facility that can verify the capability between the relevant systems.

- **About the definitions:**

- According to ebIX, customer switching refers also to some additional processes, not only the supplier switching process. For example, in countries where metering is liberalised, a 'metered data responsible' switch has to be introduced, but also "move" processes have to be carefully designed.
- Paragraph 27:
ebIX believes that the use of a European role model would help to come to a harmonized European definition for the supplier of last resort and default supplier.