Harmonised Model for Supplier Switching
Harmonised Model for Supplier switching

Report 4/2013

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1 Introduction

NordREG has worked on identifying key business processes that need to be harmonised as a part of the development towards a common Nordic retail market. The focus in this report is on the supplier switching process. NordREG considers this to be one of the most important processes in the retail market that needs to be harmonized.

In the NordREG report “The integrated Nordic End-User Electricity Market” Nordic differences in supplier switching rules and practices were identified as a significant regulatory obstacle for establishing a harmonised Nordic retail market. Identified differences may prevent suppliers from being active across national borders and may thus reduce the potential gains of having a common Nordic retail market. NordREG presented a harmonised model for supplier switching in 2008 in order to overcome some of the differences and the new switching model presented in this report is an elaboration of the 2008 model.

Recommendations presented in this report are aimed at facilitating the realisation of a harmonized Nordic retail market by 2015. In order to implement the recommendations successfully, and in the most efficient manner, each country should implement highly efficient information exchange systems and also ensure that a full scale deployment of smart meters is taking place.¹

In the process of developing the model for supplier switching in the future Nordic retail market NordREG has taken the following four principles into account²:

1. The supplier switching process should be as easy, quick, smooth and secure as possible.

2. The distribution system operators (DSOs) and the national point of information (or Information Exchange System, IES)³ must be totally neutral towards all market participants in relation to supplier switching.

3. Meter readings used in the supplier switch should be as accurate as possible. Best accuracy is accomplished with remote reading at the hour of the start of supply.

4. Customer’s rights should always be protected. It is also important for a well-functioning market that the customers trust the efficiency of the liberalised electricity market.

¹ As of today Denmark is implementing a data hub. Norway and Sweden are investigating what kind of Information Exchange System (IES) they should have and Finland is starting to look in to the question of IES. In Sweden remote reading is already in place. In Finland it will be in place by year 2014, in Norway by year 2019 and in Denmark by year 2020.

² These principles are based on the principles used for designing the predecessor to this report, “Harmonised supplier switching model, report 2/2008”.

³ From the NordREG report: High level suggestions for common Nordic processes for information exchange obstacles and possibilities, report 1/2012
This report emphasises the following stages in the harmonised model for supplier switch:

**Information gathering:**
- Customer information gathering
- Supplier information gathering on existing contract terms (Optional)
- Query Metering Point data for notification of new supply

**Switch:**
- Notification message of new supply
- Confirmation or rejection message of the supplier switch
- Communication from supplier to customer
- Cancelation message during switching process
- Notifying message to old supplier
- Meter reading message

**Functions after the switch:**
- Cancellation during the cooling-off period
- Final settlement
- Roll back an unintentional switch

### 1.1 Scope and focus

The scope of this report is to present recommendations for the switching process in a harmonised Nordic retail market. This report will provide input to the later reports, such as the moving process report and the information exchange report.

This report will answer the following questions:

- Who should be involved in a supplier switch?
- What are the maximum time frames for processes within a supplier switch; such as sending and responding to messages, collecting and distributing meter readings etc.?
- What should be the minimum content required in switching messages sent between actors?
- Who should be responsible party for ensuring that information is correct?

Target groups for this report are governments, suppliers, DSOs, transmission system operators (TSOs) and the future’s national point of information. In order to facilitate a harmonised Nordic retail market the recommendations given in this report should be used as a checklist when regulators are proposing their national switching processes.

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4 Report covering message format, detailed list of content and interface of business processes

5 With national point of information NordREG means a point where market actors can access information needed to engage in market activities such as switching, for example database and/or hub.
In this report the switching process is presented from a regulatory point of view. Technical aspects regarding information exchange systems are not within the scope of this report. General contractual rules/laws or legal aspects will only be discussed when they affect the suggested supplier switching model. The report does not take any stand regarding supplier switch during the cooling-off period. Neither will this report answer questions related to what information is needed for suppliers to provide offers to customers. As is done today, these details should be developed by the industry.

1.2 Objectives

NordREG has set up a number of objectives that recommendations for a future Nordic retail market should be in line with. The overall target is to bring national retail markets closer to each other by harmonising rules and practices, and at the same time create a better market, a market that is more efficient, a market with increased competition and that is easy to act in for customers and suppliers. The recommendations in this report have been designed with the following objectives in mind:

- **Customer friendliness.** Increase customer friendliness and make it easier for the customer to be active in the market.

- **Well-functioning common market.** Work towards a well-functioning common electricity market (wholesale and retail).

- **Improved competition.** Improve competition among suppliers, for instance through low entry and exit barriers.

- **Improved efficiency.** Customers will benefit from improved efficiency in the market.

- **Compliance with EU regulation and development.** Ensure that the suggested solutions comply with the general development in the EU and with existing and coming EU regulation.

- **Neutrality of DSOs.** DSOs should only function as market facilitators.

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6From the NordREG report “Rights and obligations of DSOs and suppliers in the customer interface, 4/201”, Page 10-11. The description of the objectives has been slightly modified.
2 Harmonised Model for Supplier Switching

NordREG defines a supplier switch as an action through which the customer acts and changes his/her supplier. This means that the meter point associated with the customer must be re-registered with a new supplier and the old supplier must be provided with a notice of termination of the current contract.

The new harmonised switching model consists of two main stages:

A. Information gathering
B. Switch

After the switch is completed there is a need for a final settlement. In case of unintentional switch there will likely be a need to roll back the switch.

2.1 Information gathering

The customer can search and/or verify information about different offers before entering into an agreement with a new supplier. With the intention to start a supplier switch, and with the customers consent, the new supplier can start gathering and verifying customer information.

2.1.1 Customer information gathering

To ensure fair and efficient competition for all suppliers in the Nordic end-user market it is important that customers are able to make fully informed switching decisions. There should be at least one neutral price comparison tool available in each country. This tool should provide up to date and reliable information on available offers.

Customers are responsible for knowing their existing contract terms. In relation to the switching process it is especially important to know the expiration date if there’s a fixed term contract in place, notice period and if there are fees for breaking the contract too early.

The current supplier is responsible providing information on contract terms to the customer upon demand. To ensure customer friendliness and efficiency in the harmonised market this information should be easy accessible for the customer at any time, e.g. available in the suppliers web portal or in mobile applications.

2.1.2 Supplier information gathering on existing contract terms (Optional)

According to good practice, the new supplier should ask the customer for information regarding existing contract terms. In case the customer is unaware of his or her contract terms the new supplier could assist the customer in gathering this information.

Especially in markets where long term contracts are common it could be beneficial if the new supplier could get this information easily from one place, like the national point for
information. The new supplier will then immediately be able to inform the customer about the risk of fees and help the customer set an optimal date for switching. This could increase customer friendliness and efficiency.

This is an optional recommendation for each country to decide on. If implemented it should be coordinated on a Nordic level.

If this process is implemented the current supplier will be responsible for providing information on contract terms to the national point of information, and it can only do so with the customers consent. It is extremely important that this information is up to date. To ensure that suppliers have incentives to report correct information there should be a monitoring and enforcement system in place.

2.1.3 Query Metering Point data for notification of new supply

The new supplier queries information regarding a certain Metering Point from the DSO or the national point of information. This is done in order to verify and collect necessary information to start the switch. There must be a power of attorney or contractual agreement in place in order for a supplier to collect information about the customer’s metering point.

The output does not cover the complete list of information needed for suppliers to conduct their business other than the supplier switch. As done today at national levels, the more detailed list should be developed by the industry.

<table>
<thead>
<tr>
<th>Metering point data query:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Minimum list of data elements to be enquired:</strong></td>
</tr>
<tr>
<td>• Customer Name</td>
</tr>
<tr>
<td>• Date of birth /Organization ID</td>
</tr>
<tr>
<td>• Metering Point ID</td>
</tr>
<tr>
<td>• Metering Point Address</td>
</tr>
<tr>
<td>• Metering method (hourly measured meter, mechanical meter etc.)</td>
</tr>
<tr>
<td><strong>Time Frame:</strong> Any time on demand.</td>
</tr>
<tr>
<td><strong>Responsibility:</strong> New supplier is responsible for carrying out the query</td>
</tr>
<tr>
<td>DSO is responsible for providing up-to-date information on the metering point to the point of information.</td>
</tr>
</tbody>
</table>

Table 1 Metering point data query

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7 Today the new supplier can access information about contract terms directly from the customer or from the customer’s existing supplier with a power of attorney.
8 The response to whether contractual fees are in place could be Yes/No as these fees are not constant. Information that fees exist should not stop the switching process unless the customer requests it.
9 It is to be decided nationally what specific information on contract terms must be provided.
10 Although this information is not crucial in order to conduct a switch NordREG has added this in order to promote more advanced contracts.
2.2 **Switch**

This chapter describes in detail the switching process including messages that are exchanged between actors and other actions related to these messages, and gives recommendations on minimum content of message, time frame and responsibility. This report does not give recommendations but sometimes a few examples on time limits for information to be sent from the DSO to the national point of information.

After the customer and the new supplier have made an agreement to switch, the new supplier starts the switch by sending a notification of new supply to the DSO or the national point of information. A transaction ID\(^ \text{11} \) is then created, and each process should be traceable back to this ID.

The total time frame for the switch should be no more than 14 days. This has been stated in two previous NordREG reports\(^ \text{12} \) and still stands.

### 2.2.1 Notification message of new supply

Notification of new supply is a message sent from the new supplier to the DSO or to the national point of information. The new supplier can send this message after all necessary data has been collected and verified. The list of data elements below is not intended to be the complete list. As done today at national levels, the more detailed list should be developed by the industry.

<table>
<thead>
<tr>
<th>Notification message of new supply:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Content of message:</strong></td>
</tr>
<tr>
<td>• Metering point ID</td>
</tr>
<tr>
<td>• Start date for supply</td>
</tr>
<tr>
<td>• New Supplier ID</td>
</tr>
<tr>
<td>• New balance responsible ID</td>
</tr>
<tr>
<td><strong>Time Frame:</strong></td>
</tr>
<tr>
<td>According to national set timeframes(^ \text{13} )</td>
</tr>
<tr>
<td><strong>Recipient:</strong></td>
</tr>
<tr>
<td>DSO</td>
</tr>
<tr>
<td><strong>Responsibility:</strong></td>
</tr>
<tr>
<td>New supplier</td>
</tr>
</tbody>
</table>

Table 2 Notification message of new supply

### 2.2.2 Confirmation/Rejection message of the supplier switch

This message is a response to the notification of new supply. It is sent from the DSO or national point of information to the new supplier, confirming or rejecting the supplier switch.

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\(^{11}\) Traceable unique number included in each switching message.

\(^{12}\) Harmonized supplier switching model (NordREG report 2/2008) and NordREG approach to the 3rd Legislative Package on retail and consumer issues (NordREG report 1/2010)

\(^{13}\) The notice period depends on the common notice period which varies between the Nordic countries: 30 days (SE), 14 days (FI) and 10 working days (DK). In NO the notice period in the standard agreement is 14 days, however when a supplier switch take place this termination period is not upheld and a switch can be effectuated as soon as possible
The message does not cover the complete list of information needed for suppliers to conduct their business, it can for instance also contain information about the customer’s historical annual consumption, but as is done today at national levels, the more detailed list should be developed by the industry.

<table>
<thead>
<tr>
<th><strong>Confirmation/rejection message of the supplier switch:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Information on confirmation or rejection:</strong></td>
</tr>
<tr>
<td>• Approval/Date of switch</td>
</tr>
<tr>
<td>• Rejection / Reason for reject Change of Supplier</td>
</tr>
<tr>
<td><strong>Time Frame:</strong></td>
</tr>
<tr>
<td>At latest one day from the Notification message of new supply has been received.</td>
</tr>
<tr>
<td><strong>Recipient:</strong></td>
</tr>
<tr>
<td>New supplier</td>
</tr>
<tr>
<td><strong>Responsibility:</strong></td>
</tr>
<tr>
<td>DSO or national point of information</td>
</tr>
</tbody>
</table>

Table 3 Confirmation or rejection message of the supplier switch

### 2.2.3 Communication from supplier to customer

Apart from other tasks in the switching process this is not an actual message, but an action taken by the new supplier.

From national law the new supplier is obliged to send a confirmation of the contract to the customer. The channel of how the information is sent is decided nationally. If the supplier wants to send additional optional information to what is required by national law the communication manner must be developed in a customer friendly way and is decided by each supplier and/or nationally.

<table>
<thead>
<tr>
<th><strong>Information from supplier to customer:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Minimum content of information:</strong></td>
</tr>
<tr>
<td>• Confirmation of start of contract</td>
</tr>
<tr>
<td>• Rejection of start of contract</td>
</tr>
<tr>
<td>• Date of start of contract</td>
</tr>
<tr>
<td><strong>Time Frame:</strong></td>
</tr>
<tr>
<td>As soon as possible after receiving confirmation message of Notification of new supply.</td>
</tr>
<tr>
<td><strong>Responsibility:</strong></td>
</tr>
<tr>
<td>New supplier</td>
</tr>
</tbody>
</table>

Table 4 Information from supplier to customer

### 2.2.4 Cancelation message during switching process

Cancelation could be necessary due to either customer request or in case of a faulty switch. If the cancelation takes place before the switch is completed a message cancelling the switch can

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14 Start of supply will be effectuated on hour 00:00
15 Examples of today’s reasons of rejection of a supplier switch are found in appendix III.
16 No later than 1 hour in the Danish hub.
17 In Denmark the new supplier confirms the change of supply to the customer not later than 9 working days before the effective date of the switch. For profile read customers a message is also sent from the data hub to the DSO requesting a meter reading within the same time frame.
be sent from the new supplier to the DSO or the national point of information. Cancellation after the switch is completed is discussed in chapter 2.3 After the switch.

If the new supplier cancels without the customer requesting it, the new supplier should inform the customer about the reason for cancellation. In case of a faulty switch the new supplier must correct the situation so that the customer and other parties involved will take no harm. As done today at national levels, a more detailed list than what is stated below should be developed by the industry.

### Table 5 Cancelation message during switching process

<table>
<thead>
<tr>
<th>Content of message:</th>
<th>Cancellation</th>
</tr>
</thead>
</table>
| Time Frame:         | Before the start of supply.  
| Recipient:          | DSO/national point of information |
| Responsibility:     | New supplier |

2.2.5 Notifying message to old supplier

In this process the DSO or national point of contact will notify old supplier of the switch. This message should be seen as the customers’ notice of termination of the contract to the old supplier.

### Table 6 Notifying message to old supplier

| Content of message: | Metering point ID  
| Time Frame:         | According to nationally set time frames  
| Recipient:          | Old supplier  
| Responsibility:     | DSO or the national point of information |

2.2.6 Meter reading message

A message containing meter reading or equivalent information from hourly register in meters is sent from the DSO to both new and old supplier or from the DSO to the national point of information who then distributes the information to the new and old supplier.

| Content of message: | Meter reading or equivalent information at the hour of the switch in case of automatic meter reading  
|                     | Meter reading the day of switch +/- 5 days in case of mechanical meter |

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18 A change of supplier can be cancelled by the new supplier up to 4 working days before the effective date in DK.

19 Is to be sent at the same time as the confirmation message of the supplier switch is sent to new supplier in SE/FI/NO and one hour after the cooling off period has expired in DK.

20 In Denmark a message containing the meter reading of profile read customers is sent from DSO to the data hub, who then distributes the meter read to new and old suppliers.
2.3 After the switch

This chapter describes the process final settlement that will take place after the switch. It also describes the processes roll back a faulty switch and cancellation during the cooling off period.

2.3.1 Cancellation during the cooling off period

In some Nordic countries the supplier is free to carry out the switch during the cooling off period but with the risk of carrying all the costs resulting from the customer cancelling. This process, as well as other processes should as far as possible be automated since this would be beneficial for the efficiency in the market.

2.3.2 Final settlement

After the switch is done the old supplier is obliged to make a final settlement based on the meter reading or equivalent information from meter sent by the DSO or the national point of information. In the final settlement the old supplier is calculating the amount of the customers’ electricity usage from the previous meter reading until the meter reading is done in relation to the supplier switch. Based on this difference in electricity usage the old supplier either bills or refunds the customer. This must take place no longer than 6 weeks from the last day of supply.

2.3.3 Roll back an unintentional switch

Unintentional switches may occur. There have for instance been incidents where customers’ metering IDs have been mixed up. When an unintentional switch is detected it must be corrected and rolled back using a manual process. NordREG stress that if an unintentional switch is detected all parties involved should be informed immediately, the customers will should always be respected and customers should not take any financial harm. To ensure this NordREG recommends that it nationally will be ensured that there are redress schemes in place for the customer. But a harmonisation could be beneficial for the efficiency in the market and should be considered in the future.

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21 In Denmark the data hub must receive a message about consumption from the DSO (time limit: see regulation D1). The data hub sends a message about consumption to the old supplier within 1 hour.

22 This is required from Directive 2009/72/EC (also known as the 3rd energy package), Article 3, Annex I: Measures on consumer protection.

23 Directive 2009/72/EC, Article 3, chapter 13, states that Member States shall ensure that an independent mechanism such as an energy ombudsman or a consumer body is in place in order to ensure efficient treatment of complaints and out-of-court dispute settlements.
3 Appendix I, Glossary

In this document the following definitions is used:

- **Automatic meter reading (AMR):** Meter reading is done automatically and remotely via data transmission system. No on-site reading needed

- **Balance Responsible ID:** Number or digit code that individualises each Balance Responsible Party

- **Balance Responsible Party:** BRP is a party who has an agreement with the TSO to produce and/or consume balancing power or neutralise imbalances in a network area

- **Customer:** With customer we mean all customers regardless consumption or legal status e.g. businesses or households. Customers and those customers that are deemed to be protected by Annex 1 (and Article 3) of the 2009 Electricity and Gas Directives, when implementing the 3rd Package. Each individual Member State may in addition choose to enlarge the scope from only household customers to also include small and medium-sized businesses. The national definition should be used when applying the indicators.

- **Cooling off period:** Period of time after entering into a contract where the customer has the right to cancel the contract without suffering any financial loss.

- **Data Hub:** An administrative centre with access to multiple independent databases, which carry out business processes, saves data and is responsible for keeping data available to the market participants.

- **Distribution System Operators (DSO):** Distribution System Operator. The operator of the local or low voltage electricity network.

- **Information Exchange System:** The system where information is exchanged between market actors.

- **Manual reading:** Meter reading made on-site either by the DSO or the customer

- **Market participant:** Party involved in the electricity markets for example supplier, DSO, Balance responsible party etc.

- **Message:** A way of distributing information via electronic data exchange

- **Meter characteristics:** By this we mean information about the meter such as metering point ID, meter number, whether the meter is manually read, remotely read or just estimated, and also other relevant technical information about the meter

- **Metering method:** Information about how metering is done. For example remotely, on-site, on two time tariff etc.

- **Metering point:** A point in the electricity network where the current transformer of meter of the metering equipment at the delivery point is connected
• **Metering point ID:** identifier code for a metering point

• **National point of information:** Point where market actors can access information, for example database or hub.

• **Notice period:** In supply contracts it signifies the period between the time when old supplier is told about customer’s intent to break a contract and the time that new supply can start.

• **Optional recommendation:** Issues that would be good to harmonise in the future but are not seen as crucial to harmonise at this moment at a Nordic level. National regulators are free to recommend this at a national level.

• **Price comparison tool:** Web service where all suppliers present their energy supply offers with price and other related information and where customer can compare which product is best with his/hers consumption batter

• **Remote reading:** Meter reading id done automatically with data transmission instead of reading on site

• **Recommendation:** Issues that are crucial to harmonise and should be changed in national legislation. National regulators should recommend these issues to national governments.

• **Smart metering:** Differs from AMR in that it enables two-way communications with the meter

• **Supplier:** The company that is the seller of electricity to the end user

• **Supplier ID:** Number of digit code that individualizes every supplier. ID is used in the messages

• **Switch:** NordREG defines a switch as the action through which the customer acts and changes his/her supplier. The meter point associated with a household must be re-registered with a new supplier. A customer moving residence should only be recorded as a switch if the customer switches supplier.

• **Switching process:** A supplier switching process starts with a customer’s initiative or acceptance to an offer from a new supplier and ends when the final bill is sent to the customer

• **Transaction ID:** Numeric code that is unique for every business process message chain. Makes it easy to connect all messages related to each other

• **Transmission system operator (TSO):** The transmission system operator which is obliged to transmit energy in the form of electrical power or natural gas on a national or regional level using fixed infrastructure facilities

• **Yearly consumption:** Metered consumption of a metering point from one year period
4 Appendix II, Overview of the switching process

The figure below draws up the general switching process that NordREG is recommending for the harmonised Nordic retail market for 2015. The figure shows what tasks are to be handled and how messages are to be sent between the new and the old supplier and the DSO or the national point of contact:

<table>
<thead>
<tr>
<th>CUSTOMER</th>
<th>NEW SUPPLIER</th>
<th>DSO/ NATIONAL POINT OF INFORMATION</th>
<th>EXISTING SUPPLIER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initiates a supplier switch or accepts an offer from a supplier. Can gather information on offers i.e. through a neutral price comparison tool</td>
<td>Queries metering point data to collect and verify metering point information</td>
<td>Automatic response to query</td>
<td></td>
</tr>
<tr>
<td>(1) Signs power of attorney for the new supplier to gather additional information, and/or (2) signs a contractual agreement to switch supplier</td>
<td>Queries information on existing contract (optional)</td>
<td>Automatic response to query</td>
<td></td>
</tr>
<tr>
<td>SWITCHING PROCESS STARTS</td>
<td>Sends Notification message of new supply</td>
<td>Receives notification message and sends Confirmation or Rejection message no later than 1 day after the notification message is received</td>
<td></td>
</tr>
<tr>
<td>Receives additional information</td>
<td>Receives and processes confirmation or rejection</td>
<td></td>
<td>Update customer portfolio</td>
</tr>
<tr>
<td>SWITCHING DATE</td>
<td>Communication from supplier to customer, i.e. confirmation of contract, switching date etc. (as soon as possible after receiving confirmation message)</td>
<td>Notifying message to old supplier, nationally decided time frames</td>
<td></td>
</tr>
<tr>
<td>Pays the final settlement</td>
<td>Receives the meter reading</td>
<td>Sends message with Meter reading at switching date +/- 5 days at the latest 9 days after switching date</td>
<td>Receives and processes the meter reading</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sends Final settlement at the latest 6 weeks after switching date</td>
<td></td>
</tr>
</tbody>
</table>

Figure 1 illustration of the supplier switching process
5 Appendix III, Summary of 2008\textsuperscript{th} switching model

In 2008 NordREG mapped the supplier switching processes in the Nordic countries and, based on the detected differences, recommended a harmonised switching model for the countries based on some key elements.\textsuperscript{24} The following recommendations, presented in a table and a graph, describes the switching model presented in 2008 in a comprehensive way. The recommendations from 2008 form the basis for the new switching model that is presented later in this report.

<table>
<thead>
<tr>
<th>HARMONISED MODEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supplier switching is possible on any weekday of the month.</td>
</tr>
<tr>
<td>Supplier switching is possible in 14 days’ notice period.</td>
</tr>
<tr>
<td>No fees are allowed in relation to supplier switch.</td>
</tr>
<tr>
<td>A common way of automatically retrieving metering point IDs is in use in each country. All suppliers have access there easily and without high expenses.</td>
</tr>
<tr>
<td>Procedures for data exchange are included in binding regulation.</td>
</tr>
<tr>
<td>One electronic data format and method is used by all market participants.</td>
</tr>
<tr>
<td>All countries have same minimum content of messages and deadlines for sending them.</td>
</tr>
<tr>
<td>Timetables regarding cancellation are similar.</td>
</tr>
<tr>
<td>One unique or at least national certifying process for testing is available and all the data systems are tested before taking them into use.</td>
</tr>
<tr>
<td>A present supplier may not oppose the switch in any situation.</td>
</tr>
<tr>
<td>Only the same person can make a supply and a network contract to the same consumption place.</td>
</tr>
</tbody>
</table>

Table 8 Harmonised switching model from 2008

\textsuperscript{24} NordREG, Harmonised supplier switching model, 2/2008. Page 6 ff.
Making a new contract and timeframe for supplier switching

NordREG suggested that the timetable for the switching procedure could be as short as possible and that the switch could take place any day of the week within 14 days. To initiate the switch customers have to be in contact only with the new supplier. The person making the supply contract being the same person who has the contract with the DSO was not seen as a critical point for harmonisation at that point.

It is important that each country has an arrangement for making relevant customer data about their national customers available, and that this information is easily accessible to all the Nordic suppliers without high expenses.

Data exchange between the market participants

NordREG suggested that a new supplier should send a message on the supplier switch to the DSO as soon as a new contract has been made and at minimum 14 days before the planned start of supply. The DSO’s time limit for sending a confirmation message containing customer data to the new supplier should be no more than three working days. The time limit should be
calculated from the moment the DSO has received the message on the supplier switch from the new supplier. As regards the DSO’s message containing customer data to the old supplier, it should be sent no later than three working days before the announced switch date. NordREG also suggested that a cancellation message from the new supplier to the DSO should be sent no later than four working days before the announced switch date.

**Metering issues**

The meter reading itself should be done on the day of the switch because it gives the most correct consumption specification, but may also, in some cases, be read ± 5 working days from the switch. Estimated metering values should only be allowed in very limited situations. Deadline for sending meter reading from the DSO to the old and new supplier should be done, by the latest, 10 working days after the switch.

There should be no financial obstacles when it comes to supplier switching and therefore also meter reading. As a result it should not be allowed to have any meter reading fees in this regard.

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25 And/or IES
6 Appendix IV, reasons for rejection of a supplier switch

NO:
Metering point cannot be identified
Requested switching date is earlier than possible
Metering point is blocked for changes
Wrong birth of date/organization number
Missing meter read
Wrong meter read
Ongoing switch

DK:
Metering point cannot be identified
Supplier is not approved
Balance responsible is not approved
Requested terminal date is not within the time limit/deadline
A move for the metering point has been notified at a terminal date before the date of the supplier switch
Metering point is blocked for supplier switch, due to for instance
 supplier switch is already notified at the terminal date
 metering point is recorded as inactive or closed at the terminal date
 metering point is recorded as "prioritised" production

SE:
The suppliers Ediel-id (is missing)
That a balance responsible party has (not) been appointed
That the switching message has arrived in time
Metering point-id (is wrong)
Net grid area code (is wrong)
Customer-id (is wrong)
Metering method (is wrong)
If another supplier has report a supplier switch for the same date and the same metering point-id

FI:
Metering point ID does not exist
DSO-ID is wrong (meaning that the message has been sent to wrong DSO)
Metering point address doesn’t match with metering point ID (not all DSOs do this)
Customer has a valid fixed term contract
Requested switching date is before 14 days have passed since the start of supply message
Other cases (for instance supplier-ID is wrong)