

---

---

# **A Universal Indicator of Customer Switching Activity**

**Written by: Dr Philip E. Lewis**

For the Finnish Energy Market Authority and  
ERGEG (European Regulators Group for Electricity and Gas)

**Ref: VEMG-EMV-UICS-01-06**

Report Date: 06 January 2006



## Executive Summary

Since the opening up of electricity markets around Europe and the Globe, there has been an interest and a need to measure, follow and compare the level of customer switching activity and its development over time. This interest is primarily derived from a need to evaluate the level and quality of competition within liberalized electricity markets, a key indicator of which is seen as customer switching activity.

The definitions used for switching activity purposes vary considerably between countries however, within a European and a Global context, thus making comparison difficult. Comparability is hindered still further by the fact that some countries do not systematically collect switching information. Where systematic methods do exist, they are commonly at least to some extent peculiar to those individual countries. Consequently, insufficient useful comparative customer switching data is currently available. Within Europe, this problem is arguably compounded by current European level reporting of comparative switching statistics – reporting which fails to give a realistic picture of the relative switching activity across European energy markets.

Both from the domestic, European and Global viewpoint there exists, therefore, a need to define and measure customer switching activity in a standard way taking also into consideration the practical side of the data collection procedure.

This report proposes a simple and clear best practice definition and process for the purpose of customer switching data collection in Europe. This ***Universal Indicator of Customer Switching Activity*** assumes that: each country will officially collect their own data; that collected data will be publicly available; that procedural simplicity as well as data quality, transparency and comparability are key pre-requisites.

The report concludes that a switch is essentially seen as the free (by choice) movement of a customer (defined in terms of an overall relationship or the supply points and volume of electricity associated with the relationship) from one supplier to another. '***Switching Activity***' is defined as the number of switches in a given period of time. It is also proposed that switching activity be measured through the application of three approaches: the Supply Point Approach; the Customer Approach and the Energy Volume Approach.

## Contents

<b>EXECUTIVE SUMMARY</b>	<b>3</b>
<b>PREFACE</b>	<b>3</b>
<b>CONTENTS</b>	<b>4</b>
<b>1. Introduction</b>	<b>5</b>
1.1. Background	5
1.2. Report Objectives	5
1.3. Methodology	5
<b>2. Pre-requisites for a Universal Indicator of Customer Switching Activity</b>	<b>6</b>
2.1. A Consistent Definition and Interpretation of the Term ‘Switching’	6
2.1.1. The Supply Point Approach	6
2.1.2. Customer Approach	8
2.1.3. Energy Volume Approach	10
2.2. A Consistent Source of Information	11
2.3. A Consistent Regularity of Data Collection	11
2.4. Mixed Approaches	11
2.5. A Clear Mandate	11
2.6. Clear Data Definition	11
2.7. Segmentation of Data	12
<b>3. A Suggestion for A Universal Indicator of Customer Switching Activity</b>	<b>13</b>
3.1. Definition of Switching Activity	13
3.2. Approaches to Data Collection	13
<b>4. Appendices</b>	<b>15</b>
4.1. Questionnaire	15

## **1. Introduction**

### **1.1. Background**

Since the opening up of electricity markets around Europe and the Globe, there has been an interest and a need to measure, follow and compare the level of customer switching activity and its development over time. This interest is primarily derived from a need to evaluate the level and quality of competition within free liberalized electricity markets, a key indicator of which is seen as customer switching activity.

The definitions used for switching activity purposes vary considerably between countries however, within a European and a Global context, thus making comparison difficult. Comparability is hindered still further by the fact that some countries do not systematically collect switching information. Where systematic methods do exist, they are commonly at least to some extent peculiar to those individual countries. Consequently, insufficient useful comparative customer switching data is currently available. Within Europe, this problem is arguably compounded by current European level reporting of comparative switching statistics – reporting which fails to give a realistic picture of the relative switching activity across European energy markets.

Both from the domestic, European and Global viewpoint there exists, therefore, a need to define and measure customer switching activity in a standard way taking also into consideration the practical side of the data collection procedure.

### **1.2. Report Objectives**

This report aims to propose a Universal Indicator of Customer Switching Activity, a simple and clear best practice definition and process for the purpose of customer switching data collection in Europe. The proposal assumes that: each country will officially collect their own data; that collected data will be publicly available; that procedural practicality (e.g. simplicity and cost effectiveness) as well as data quality, transparency and comparability (between time periods, countries, electricity/gas, other industries – to some extent) are key pre-requisites.

Specifically, the report aims to provide: a consideration of the pre-requisites for useful and comparable customer switching data collection and presentation; summaries of selected examples of definitions and practices in fully liberalized electricity markets around the world; consideration of the virtues and drawback of alternative definitions and practices; suggestions for a consistent definition and a practical best practice.

### **1.3. Methodology**

In addition to existing literature on the topic and knowledge already collected by VaasaEMG and its partners (in particular as part of the extensive VaasaEMG-Peace Utility Customer Switching Project: [www.peace.com/customer-switching](http://www.peace.com/customer-switching)), VaasaEMG contacted and interviewed (or sent email questionnaires) regulatory authorities and or other experts in selected case countries,

namely Austria, Great Britain, the Netherlands, Norway, Portugal, Spain, Sweden, USA, New Zealand and Australia. VaasaEMG is itself an expert on the Finnish market.

## 2. Pre-requisites for a Universal Indicator of Customer Switching Activity

### 2.1. A Consistent Definition and Interpretation of the Term 'Switching'

The term 'Switching' can refer to one or more of the following constructs depending on the country concerned, the source of the information and the philosophy of the communicator. The definition with is accepted and the approach used for collecting switching information are furthermore naturally interdependent.

#### 2.1.1. The Supply Point Approach

Several liberalised markets (including Austria, Norway, Sweden Portugal, New Zealand and the US and Australian markets) collect information on the total volume of meter/supply point switches since liberalization or over a given period of time. This information is generally collected directly from the DSO's on a quarterly (e.g. Norway, Sweden) or even monthly basis (although in some cases DSO's only pass on this periodical information at the end of a given year, e.g. Austria), with the consequent advantages that: data is collected frequently and regularly from a reasonably reliable source; it does not need to be estimated in any way; and the possibility of double counting, whilst not avoided, is limited. This approach also generally, though not always, enables the identification of the percentage of supply points in each DSO area that remain supplied by their incumbent retailer, as well as the volume of energy which has switched (although only the volume of meter supply point switches in a given time is an indication of switching '**activity**').

The use of this approach generally further infers the inclusion of multiple switches by the same customer within a given time-tracking period, and switch-backs (when a customer switches back to a former or previous supplier) within a given time-tracking period.

A peculiarity of this approach is that the number of switches recorded represents the number of supply point switches rather than (per se) the number of customers who have switched. This means for instance that if a given switching customer (switching from an incumbent supplier) has 3 meters / supply points in the same or different locations in the same DSO area and switches all of them, then that customer switch will be recorded as 3 supply point switches. A 'customer' is consequently measured in terms of supply points. Also gas and electricity at the same house counts as 1 gas supply point and 1 electricity supply point = 2 supply points. Since residential customers typically have only one supply point in a given DSO area, this anomaly may be considered more relevant to industrial, commercial and public service customers and may lead to switching levels appearing relatively higher than they are for such customer segments. However, in countries such as Norway and Sweden many residential customers have free time cottages in addition to their homes, sometimes within the same DSO area. Whether or not this anomaly is misleading or not appears debatable, but whichever viewpoint is taken, it would appear important to carefully consider the anomaly when comparing different countries or customer segments.

A number of more clear drawbacks and potential limitations to this approach do, however, exist. One serious issue is that it is not always easy to obtain the required supply point information from DSO's. Without a powerful and clear mandate, as is the case for instance in Austria at present, DSO's who do not wish to publicise their privileged data may choose not to, or may provide non-comparable or incomplete data. Even where a powerful mandate does exist, as in Norway, the sheer workload involved in collecting and analysing data from large numbers of DSO's can lead to information being taken from a sample of, rather than all DSOs. In Norway, only 29 DSO's out of approximately 100 are measured, although this relates to approximately 80% of residential and 90% of industrial and commercial customers, albeit the more urban and thus arguably more active customers. Furthermore, the issue of data protection can limit the availability of high quality information when it does exist. In Great Britain for instance, the regulator has access to supply point data provided by the central meter management organization, but this information is not publicly available due to British data protection laws.

Another potential problem with the data is that depending on the nature of the switch, a switch may sometimes be registered as such, whilst not being registered at other times. For instance, in general a switch requires a change of supplier, but under the supply point approach a customer who remains with the former supplier after moving to a new DSO area is generally seen as a switcher whilst a customer who changes supplier when moving to a new DSO area but switches to the local incumbent supplier for that area, is seen as a non-switcher. This complication results from the fact that the supply point approach generally assumes that a switch is defined purely by what is happening at the supply point rather than what the customer is doing. Customer choice activity and switching behaviour is therefore not in all cases indicated by the supply point approach.

Generally, contradictions of the kind mentioned above tend to result mainly when customers move between DSO areas. The following table illustrates instances where there may be a mismatch between the generally accepted view of what constitutes a switch, and whether a switch is indicated under the supply point approach. The table additionally illustrates that in some cases the supply point approach can lead to double counting of switches, which is because every move affects at least two supply points, the outgoing one and the incoming one (the table assumes that the default supplier to each supply point is the incumbent DSO for that area). Furthermore, for the same reason, even if a customer switches from one competitive supplier to another, whether or not that is considered a switch in practice can depend upon which supplier is newly chosen at the outgoing location, and which supplier was formerly at the incoming location. Perhaps conversely and strangely, it may even be the case (depending on the collection method) that if a customer moves to a new area and switches at the same time, but not to an incumbent, the switch will not be counted as such. This last anomaly can occur if data is collected only from DSO's and in an ambiguous manner.

These contradictions raise the question of how a switch should be in practice defined when a customer moves location and whether or not this approach is sufficient on its own or if it requires additional corroborating and balancing approaches to be used in parallel.

A further potential limitation of the supply point approach is that it does not provide much additional information which would be of use in the development of switching related policy. For instance, it does not provide information on the reasons why customers are switching supplier, nor does it link detailed demographic information to those who have switched. For this reason

the data which is provided through the supply point approach cannot be truly understood in the absence of additional research information.

Depending on the exact data collection method used this approach may also not identify whom customers switch to (especially if the customer moved beyond the DSO area), and it cannot under any circumstances identify how many customers (as opposed to supply points) have switched since liberalization, a figure which some experts see as the true indication of market activity. For this reason, the supply point approach does not provide extensive data on market share either, except within a given DSO area.

Figure 1. When Does Moving (DSO area) Mean Switching?

Customer Situation		Typical Switch Definition	
Pre-Move (DSO area A)	Post-Move (DSO area B)	Accepted View	Supply Point Approach
Incumbent (A)	Incumbent (A)	Non-Switch	Switch
Incumbent (A)	Incumbent (B)	Non-Switch	Non-Switch
Incumbent (A)	Competitor (B)	Switch	Switch
Competitor (A)	Competitor (A)	Non-Switch	2 Switches
Competitor (A)	Incumbent (B)	Switch	Switch
Competitor (A)	Competitor (B)	Switch	2 Switches

Key To Type of Supplier	
<b>Incumbent A</b>	Supplier which is the default electricity supplier in customer's pre-move location
<b>Incumbent B</b>	Supplier which is the default electricity supplier in customer's post-move location
<b>Competitor A</b>	Alternative supplier in customer's pre-move location
<b>Competitor B</b>	Alternative supplier in customer's post-move (& possibly pre-move) location . Different to Competitor A

© 2006 P. Lewis / VaasaEMG

### 2.1.2. Customer Approach

Some liberalised markets such as Finland, Great Britain, Netherlands, primarily gather switching data which relates to the activity of the customer. Other countries, such as Austria, Norway, Portugal and Sweden collect this data as an additional source of information. This information may include one or more of the following:

- **the number and or percentage of customers who have switched supplier;**

- **the number and or percentage of customers no longer with their incumbent supplier** (which does not include those customer who have switched back to their incumbent supplier due to an improved price offer or some other reason);
- the number of customers who are no longer with any supplier which could be considered an 'incumbent supplier';
- the number of customers who have entered the competitive market by taking a tariff other than the regulated or standard incumbent tariff (even if they are still with their incumbent supplier at a price far higher than would be available from other suppliers);
- **the total volume of customer switches over a given period of time** (including multiple switches by the same customers and switch-back to original or incumbent supplier);
- the number of switches away from incumbent suppliers (switches from one incumbent to another are not included)

Of the above types of information, the most commonly used are those which are highlighted. More specifically, the percentage of customers who have switched supplier is considered an indication of how many customers have truly exercised their choice and taken part in the switching process. The percentage of customers who are no longer with their incumbent supplier on the other hand is an indication of how competition has reduced incumbent dominance. The total volume of customer switches over a given period provides a clear picture of switching trends, which in turn indicates the current status of switching at any given time and enables research into the dynamics and determinants of customer switching activity on competitive liberalized electricity markets. It can therefore be argued that only the volume of customer switches over a given period is an indication of 'customer switching activity'.

It is important to note here, that the choice of switching information type (mentioned above) should not preclude the gathering of information on market shares of incumbent and non incumbent suppliers, or information on the direction of customer switching. Furthermore, in all cases the chosen switching definitions refer to changes of customers between alternative suppliers. The number of customers entering the competitive market by taking a tariff other than the regulated or standard incumbent tariff is not considered to be a definition of switching. On the contrary, a customer who chooses a competitive tariff with their existing supplier is choosing not to switch, and because of this and because the competitive tariff is often accompanied by a fixed-term contract, the customer is effectively being taken out of the competitive market before competition has even begun. Nevertheless, customer switching figures in some countries (eg. some statistics in Sweden and Finland) tend by default to integrate switch of tariff, even though values may sometimes be derived which exclude it.

As regards the role of moving, the customer approach is flexible in the way it incorporates moving into the switching equation, since surveys gather the information which they request (within reason). Nevertheless, the generally accepted view on moving is that when a customer moves, a switch should only be recorded if a customer switches to a supplier other than the supplier which is incumbent in the area where he/she is moving to. Consequently if a customer: (1) remains with the current supplier or (2) switches to the default supplier in the new location, no switch should be recorded. In both cases it can be stated that the customer took the simplest route. For instance in some countries such as Finland the easiest route when moving is to take the default supplier in the new destination, whereas in other countries such as New Zealand and Australia, moving customers are generally retained by suppliers because of the way they interact with customer within the moving process.

Sometimes however, in practice, a customer may be considered to have switched supplier in a given period of time in case 1 (e.g. Norway and Portugal) and 2 (e.g. Great Britain). Furthermore, when measuring switching in terms of customers no longer with the incumbent, a customer is generally and arguably correctly considered a switcher in case 1 (e.g. Great Britain). However, so long as the survey questionnaire is detailed enough, it is possible to subtract these cases from the switching figures and apply whichever definition is preferred.

Within the customer approach (frequencies may be different where other approaches are concerned), data is typically collected through surveys such as customer questionnaires (e.g. Finland, Great Britain, Norway, Portugal) and occasionally (e.g. Netherlands) through surveys sent to suppliers / DSOs. The data is commonly collected quarterly (e.g. Great Britain, Norway), but may also be collected monthly (e.g. Netherlands, Sweden), half yearly (e.g. customer questionnaires by TEMO in Sweden), or less often or occasionally (often the case for customer questionnaires, e.g. Finland).

The advantage of customer surveys is that they provide explanations for switching through enabling the collection of very detailed and extensive information including demographic information, motivations and experiences related to customer switching. Surveys conducted on suppliers (or suppliers and DSO's) essentially have the advantages afforded by the supply point approach (especially if both DSO's and Suppliers are surveyed as in the Netherlands) whilst additionally allowing the provision of data on customer switches, market share and direction of switch and possibly avoiding the switch contradictions associated with the supply point approach. Such survey work, if done comprehensively, can however require a lot of work and careful questioning and analysis in order to provide comparative data and avoid data duplication.

It can therefore be stated that both types of surveys are advantageous and can complement each other. The need for a powerful mandate, representative sampling, quality research methods and regularity of surveys nevertheless applies to surveys on customers and suppliers / DSOs.

### **2.1.3. Energy Volume Approach**

It can also be considered beneficial to measure switching in terms of the volume of energy which is switched, either the volume of volume of energy which is no longer supplied by incumbents or the volume of energy which has switched supplier. By doing this, it is possible to see the significance of switching in relation to the overall supply of energy. This is relevant because customers consume such differing amounts of energy, but this approach to measuring switching does not indicate the overall level of market activity, largely ignores issues relating to market welfare, heavily favours industrial behaviour and derives completely different results from the other approaches.

Most countries (e.g. Ireland, Portugal, Finland, Norway) obtain information relating to the volume of energy switched, through the use of supply point or survey data, but it is typically seen as supplementary to the other approaches rather than exclusive.

## **2.2. A Consistent Source of Information**

As described above, switching calculations can come from many sources including DSOs, suppliers and customers. Furthermore, information can be collected through mandatory submission or information or through surveys with varying sample size, coverage and independence. In the interest of consistency of information it would appear important to ensure that given approaches use consistent sources of information with similar characteristics and biases. In practice, this may not always be possible due to market structure and traditions, and it may be compromised by the need for subcontracted services and by the analytical and interpretive practices of the regulators who generally receive and publish the collected information.

## **2.3. A Consistent Regularity of Data Collection**

The most common interval for data collection appears to be 3 months, resulting in quarterly data collected at the end of a calendar month and ultimately at the end of the calendar year. Information is however, sometimes collected monthly and sometimes less frequently and even infrequently (without regularity). In the interest of consistency of information it would appear important to ensure that given approaches collect data at least on the above mentioned quarterly basis.

## **2.4. Mixed Approaches**

Since each of the three above mentioned data collection approaches have clear strengths, weaknesses and advantages, it would appear logical and beneficial to collect data in accordance with more than one, if not all three approaches. Whilst it is accepted that this would incur additional cost and effort, it would provide the depth and breadth of information necessary to comprehensively identify and understand the switching within the market and thus indicate implications for policy measures. The use of mixed approaches (as takes place in e.g. Sweden, Norway and Portugal) provides corroborative data which enables data weaknesses to be identified and compensated.

## **2.5. A Clear Mandate**

The above findings clearly indicate that information should be sourced in an obligatory manner (in which case all sources have to co-operate with the collector – e.g. the regulator). Approaches to data collection should be firmly mandated by law and or by a strong regulator. Information collected in a voluntary manner is likely to be only partially tapped.

## **2.6. Clear Data Definition**

Detailed but clear supporting explanations must always accompany the presentation of switching data within the public domain. These explanations should relate to the definitions and approaches applied to the collection of the data, the source of the data and the data analysis, but should also state whether the data concerns gas, electricity or both, and which groups of customers (by usage etc.) it relates to, when it was collected and if there are any other

peculiarities relating to the data. In this way the data not only becomes more transparent and explicit, but it also becomes easier for onlookers to identify the extent and limitations of the comparability of the data provided for different periods and countries.

## **2.7. Segmentation of Data**

Data is sometimes separated into gas versus electricity but sometimes not. In Great Britain, USA and Australia gas and electricity switching data is integrated into the same figures on account of the fact that the two markets are so integrated and dual fuel marketing is common place. In other countries the markets are either separately measured or only electricity is measured since gas is not or is barely available. In both cases it is not clearly stated whether or not the figures relate to just electricity or electricity and gas. It would seem logical to have both separate and mixed figures.

Data is rarely segmented into smaller consumption bands, especially where the supply point approach is concerned. In Austria data is segmented into residential, small commercial, farms and industrial and the industrial segment can be sub-segmented, but in most countries data is essentially just segmented into residential and industrial/commercial. It would seem logical to segment switching data into smaller consumption groups in order to enable a clearer understanding of which types of customers are switching and which are not.

Data is also rarely segmented by type of tariff, especially where supply point data is concerned. In the Netherlands it is possible to segment switchers into green and non-green switchers (and even whether customers are switching to or from a green tariff) and in some cases survey data enables the identification of information such as whether switchers are choosing fixed, variable or market based tariffs, but generally tariff type and switching information are not integrated.

It would be logical to segment switching more in terms of type of energy, customer and tariff/price/saving etc. in order to better understand the dynamics of customer switching.

### 3. A Suggestion for A Universal Indicator of Customer Switching Activity

It is proposed that an indicator of customer 'switching activity' should incorporate the following characteristics.

#### 3.1. Definition of Switching Activity

A switch is essentially seen as the free (by choice) movement of a customer (defined in terms of an overall relationship or the supply points and volume of electricity associated with the relationship) from one supplier to another. **Switching activity is defined as the number of switches in a given period of time.**

A switch additionally includes:

- A re-switch: when a customer switches for the second or subsequent time, even within the same measured period of time.
- A switch-back: when a customer switches back to his/her former or previous supplier.

Switching and moving

When a customer moves, a switch should only be recorded if a customer switches to a supplier other than the supplier which is incumbent in the area where he/she is moving to. A switch should not be recorded if the customer remains with the same supplier as before the move.

Changes of tariffs

A change of tariff with the same retailer is not equivalent to a switch (this exclusion extends to: changing to a new tariff; changing from a regulated to a non-regulated tariff with the same supplier or a subsidiary of the same supplier).

#### 3.2. Approaches to Data Collection

Switching activity should be measured through the application of three approaches: the Supply Point Approach; the Customer Approach and the Energy Volume Approach. In each of the three approaches, data should be segmented into consumption bands (at least for residential, commercial and industrial data), as well as gas and electricity data, whilst also being aggregated (un-weighted) into one set of data.

Supply Point Approach

- Data collected: The total volume of supply point switches (as a % of market supply points) over a given period of time.
- Source of data: DSO / metering manager (all DSO areas).
- Collection method: Submission by the source of data.
- Frequency of data: At least quarterly, commencing January to March.
- Data recipient: Regulator.
- Availability of data: Public.
- Pre-requisites: Precise, compulsory collection requirement placed on source of data; avoidance of data protection law restrictions.

Customer Approach:

- Data collected: The total volume of customer switches (as a % of customers in the market) over a given period of time; destination of customer switching; market shares and share changes; motivations for switching, demographic and tariff-type segmentation of switchers.
- Source of data: Customers or suppliers.
- Collection method: Survey.
- Frequency of data: At least quarterly, commencing January to March.
- Data recipient: Regulator.
- Availability of data: Public.
- Pre-requisites Statistically valid and reliable sampling; if data is collected from suppliers then the pre-requisites are as for the supply point approach.

Energy Volume Approach:

- Data collected: The total volume of energy switched (as a % of energy supplied in the market) over a given period of time.
- Source of data: Supply Point Approach or Customer Approach.
- Collection method: See Supply Point Approach or Customer Approach.
- Frequency of data: At least quarterly, commencing January to March.
- Data recipient: Regulator.
- Availability of data: Public.
- Pre-requisites See Supply Point Approach or Customer Approach.

## 4. Appendices

### 4.1. Questionnaire

**1. What do you collect information on regarding customer switching?**

- a. Number of supply point switches of retailer
- b. Number of customers who have switched
- c. Volume of Energy which has switched
- d. Other

**2. Which of the following are included in /excluded from the switching figures?**

- a. Re-switching: when a customer has switched more than once, even within the same measured period of time.

If so, can these figures be separated from the broad switching trend rate figures?

- b. Switch-Backs: when a customer switches back to his/her former or previous retailer.

If so, can these figures be separated from the broad switching trend rate figures?

- c. Switches of tariff within the same retailer / changing from a regulated to a non-regulated tariff with the same retailer (switching to a market contract).

If so, can these figures be separated out?

- d. Switches which are simply the result of moving home (i.e. if a customer, through moving, changes retailer but remains with the local - formerly incumbent for that area – retailer).

If so, can these figures be separated out?

**3. If a customer remains with the former retailer after moving to a new area, is that considered as a switch of retailer?**

**4. Are there separate switching figures for different customer segments (e.g. residential / commercial / industrial)? EXPLAIN AND STATE THE CONSUMPTION BANDS OF EACH SEGMENT**

**5. Are there separate switching figures for electricity and gas? EXPLAIN**

**6. Are there separate figures for different types of energy / product (e.g. green energy or long-term / market-linked tariffs)? EXPLAIN**

**7. How frequently is the above described switching data collected / reported**

**8. Is data collected at any particular time of day/week/month/year**

**9. Who collects/analyses/reports the data?**

- 10. Where is the data collected from (which source: e.g. DSO's, retailers, customer survey, other)? How is this achieved (is it compulsory or voluntary and how is the data sent?)**
- 11. Is the data public / how is it made available to the public?**
- 12. Other clarifications of the data definition, quality or processes of collection (which you would like to mention)?**
- 13. What are the main motivations for collecting these statistics?**
  - a. To analyze new entrant market penetration
  - b. To assess the demand side activity of a wholesale market
  - c. To assess overall market activity
  - d. To assess customer choice
  - e. To be able to benchmark against other industries/markets
- 14. What are the total number of supply points / customers and is this data updates regularly?**
- 15. Does the above described process enable you to know the % of customers in each distribution (DSO) area that remain / are with their incumbent retailer?**