

Dear Alexander,

Thank you for the opportunity to comment on your July 2017 consultation titled *Energy supplier rating*. Extraenergy recognises the benefits that a supplier rating tool can bring to consumers and are keen to work with Citizens Advice and others to ensure the tool provides them with a useful source of information.

Below are answers to your specific questions.

***1 Do you agree with our aim to introduce changes from December 2017?***

Yes. We agree with your aim to make changes from December 2017 but believe that you should remain flexible depending on the quality of the data provided. You should also note that some metrics may require suppliers to establish new reporting methods or system developments which will require time to implement. We also believe that a further consultation will be required to describe your final decision on metric to use and how these will be weighted for the calculation of the final supplier rating.

***2 Do you support our proposed threshold for mandatory inclusion in the rating of 50,000 domestic customers?***

Yes. This will provide consumers with a wider view of supplier performance. However we believe that there should also be a time factor with a supplier serving 50,000 customers for a period of time, yet to be determined, to ensure the supplier is providing a proven level of service. It can be argued that serving this level of customers can be simpler in the beginning but become more complicated as time goes by.

***3 Do you support the voluntary inclusion in the rating? Do you support our proposed requirements for suppliers wishing to join?***

No. We believe that there are suppliers with very low numbers of customers where a small team of individuals can successfully provide high levels of service, but where their numbers grow rapidly would struggle to continue to offer that high service level. This would have the potential of misleading consumers of the service level they can expect.

***4 Do you have views on how we could improve information we provide to consumers about suppliers with fewer than 50,000 customers who do not voluntarily join?***

As with question 3 above we remain concerned that the provision of a ranking score for these small suppliers could mislead consumers.

***5 Do you agree that accuracy of bills is a suitable metric for assessing billing performance? Do you have views on which of the options for measuring bill accuracy is most appropriate?***

Billing performance / accuracy is a suitable metric but only if the correct metric / metrics are used. Larger supplier's smart meter regulatory requirements began earlier this has resulted in those suppliers being able to remotely connect to a larger proportion of their meters for meter readings and so consideration of the smart portfolio is important.

We would like to see further collaboration between energy suppliers and Citizens Advice before a final decision is made on this metric, and would suggest a round table discussion to explore views and options.

***6 Do you consider that timeliness bills is a suitable metric for assessing billing performance? Do you have views on whether it is more appropriate to measure timeliness of all bills, or just final bills?***

Timeliness of bills is a suitable metric for assessing billing performance. We believe that the metric should cover all bills to provide customers with useful insight. Because consumers use your rating tool to help inform their decision on which supplier to move to it is the timeliness of regular bills they will be interested in and not the final bill.

Consideration also needs to be given to the billing frequency as suppliers offering different services. Where suppliers offer a frequency beyond the minimum required under licence conditions their rating should be assessed on that frequency.

***7 Do you favour using timeliness, accuracy of bills, or both, as metrics of supplier performance on billing? Are there other metrics that we should have considered?***

We believe both metrics are important to consumers and both should be used.

***8 Do you agree that the Guaranteed Standards are an appropriate measure of supplier performance for prepayment?***

No, not only for prepayment customers. We suggest that guaranteed standards are a useful source of information for both credit and prepayment customers under a separate metric.

***9 Do you support Option 1 (including prepayment where suppliers have sufficient PPM customers)? Do you support the proposed thresholds?***

We are not convinced that prepayment metrics can be easily included in a comparison tool with suppliers that serve mainly credit customers without causing consumer confusion. Consideration should be given on how to provide data on prepayment and credit services to customers, we would suggest the use of different tables for suppliers who serve a large number of prepayment or credit customers, where a consumer can select their preference for a ranking table based on their preference.

Potential prepayment metrics should consider the timeliness of annual statement, the delivery of a prepayment top up card, and the proportion of customers using the correct top up card.

***10 Do you support Option 2 (scoring all suppliers according to billing performance only)?***

No. As above consideration should be given to a separate prepayment and credit ranking table.

***11 Do you support our focus on telephone support as the key route for consumers to contact their supplier? Do you support our proposed metric in this area (average wait time for telephone services)?***

Yes. But other methods of contact should also be considered.

***12 Do you support the option to include additional contact methods in the scoring for some suppliers? Do you support the proposed threshold for including additional channels?***

Yes. We see the value in providing consumers with details of additional methods of contact, but suggest further consideration is required through further collaboration and round table discussion. In addition, the current wording of the metric would seem to allow a supplier to pick and choose their best performing alternative method of contact for data provision which would mislead customers.

***13 Do you agree that changing the weighting of OSE cases would better reflect consumer outcomes? If not, please provide your reasoning.***

No. We believe that a complaint is a complaint and all should be treated equally. A complaining customer whose complaint is not upheld by the ombudsman feels no less aggrieved than a customer

whose complaint is upheld. This metric is about how a customer feels and the complaint handling process of the supplier.

**14 Do you agree with our proposed approach to non-compliance with information requests?**

Yes. Though you should note the level of burden information requests represent, particularly for smaller suppliers. Perhaps a larger supplier (one of the big 6) should have a greater penalty for non-return, we suggest the Big 6 because even though there are other large suppliers based on the regulation customer number of 250,000, the Big 6 have a far greater number of customers and a far greater number of resources at their disposal. We would also like you to consider amending the rating mid quarter where a supplier has, for technical reasons, been unable to provide you with accurate data, but where they subsequently work to overcome those issues and provide reliable data.

**15 Do you agree with our proposed approach for white label brands in the supplier rating?**

No. White label customer metrics should be included in the parent supplier metrics since they are providing the majority of their service.

**16 Are there any other changes to the supplier rating?**

Consideration should be given to the frequency of the reporting. As it currently stands the beginning of the quarter for which an updated ranking is provided can be almost six months in the past, and the supplier may have drastically improved or worsened their service. A quarterly update runs the risk of providing consumers with inaccurate and misleading information, which we note is against supplier regulation. A more granular reporting frequency and quicker publication will provide consumers with valid up to date information.

We welcome the work undertaken by Citizens Advice to refine and improve the supplier rating tool, which should provide additional clarity for consumers. It is noted that the consultation does not explain how these metrics will be weighted or how they will feed in to the overall supplier rating. We would like to see further engagement and round table discussion, along with further consultation on the outcome of this consultation including how you suggest weighting each metric to establish the overall rating.

Regards,

David.

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