

# **Citizens Advice Star Rating Review**

Consultation 2024 - 2025

December 2024

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# Introduction

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Citizens Advice provides free, independent, confidential and impartial advice to everyone on their consumer rights and responsibilities. We are the statutory representative for energy consumers across Great Britain, and as part of this role we are required to fulfil certain statutory functions, with our energy supplier star rating fulfilling part of this function.<sup>1</sup>

The star rating assesses suppliers in a range of areas to give an overall score. It is published on the Citizens Advice website<sup>2</sup> and was first produced in 2016.

In addition to our legal obligations, the Citizens Advice Star Rating has 3 key objectives:

- To provide consumers with accessible information about aspects of energy supplier customer service performance that matter to them.
- To enable consumers to make more informed switching decisions.
- To encourage competition between energy suppliers based on measures of key areas of customer service.

In developing the rating we consider the needs of a wide range of consumers, and take particular account of the needs of consumers in vulnerable circumstances. We do this by taking account of a wide range of research, commissioning new research where there are gaps, as well as conducting user testing and making use of web analytics.

To meet these objectives for as many consumers as possible we prioritise maintaining the widest possible market coverage for the rating, while meeting our other objectives. This particularly supports switching decisions, as consumers are likely to encounter small and medium firms among the cheaper options on the market.

We also know that service performance can improve or decline quickly, so to meet our objectives we publish our rating quarterly and use data which is as up to date as possible.

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<sup>1</sup> Specifically, the duty to publish information about consumer matters (Section 10) and complaints (Section 45) under the [Consumers, Estate Agents and Redress Act 2007](#)

<sup>2</sup> Citizens Advice (2024) [Compare energy suppliers' customer service](#)

## Why we're reviewing the rating

We last reviewed the rating almost 2 years ago, at a time when the market was undergoing significant change.<sup>3</sup> Almost 30 domestic suppliers had failed, and energy supplier customer service was struggling in the face of rising demand from consumers during the gas crisis.

The review removed some measures from the star rating where supplier performance had converged. We also placed more emphasis on how easily people could get in touch with their supplier, which was a key concern for consumers during the gas crisis.

In addition, we decided to give small energy suppliers<sup>4</sup> a rating, but they are only scored against measures other than complaints, as this score can see very large swings for suppliers of this size based on small numbers of complaints.

Since then, market conditions have become less volatile, AI-powered services have continued to emerge, and smart meters have been more widely adopted. Complaints have fallen on average from very high levels during the early phases of the gas crisis between 2022 and early 2024, and are now at a level which would be considered high historically, but down a third from their peak. Call wait times have also improved significantly.

In relation to regulation, Ofgem has introduced new consumer standards around customer service<sup>5</sup> and put in place rules that require all energy suppliers:

*To publish the latest licensee's overall customer service performance rating and its scores for each customer service category as measured by the Citizens Advice star rating, as soon as possible after it becomes available, in a prominent location, in a format that is readily accessible and that meets the needs of Domestic Customers, including those Domestic Customers in Vulnerable Situations.<sup>6</sup>*

Ofgem has also started publishing data on overall satisfaction for customers of large energy suppliers, drawing on data from a regular survey that is co-commissioned with Citizens Advice.

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<sup>3</sup> Citizens Advice (2023) [Decision Document on Revised Methodology for the Citizens Advice Star Rating](#)

<sup>4</sup> Small suppliers are classed for the Star Rating as those with fewer than 25,000 customers.

<sup>5</sup> Ofgem (2023) [Consumer Standards - Decision](#)

<sup>6</sup> Ofgem (2023) [Consumer Standards - Decision](#), 4.13

Ofgem has also recently set out a clear vision on its expectations of future service standards in the sector in its Consumer Confidence programme,<sup>7</sup> including to improve its data to *'enable household and business consumers to make better, more informed decisions'*.

As a result of these changes in market conditions and regulation, and in line with our practice of reviewing the star rating regularly, Citizens Advice has decided to conduct a review of the Star Rating methodology.

## What we've done so far

In order to develop our understanding of the key issues under consideration, we conducted initial engagement with energy suppliers, consumer groups and other interested stakeholders in October 2024.

We held:

- Two workshops with domestic energy suppliers of all sizes, with combined market share of over 99%.
- Discussions with non-supplier stakeholders including Consumer Scotland, the Extra Help Unit, the Energy Ombudsman, Advice Direct Scotland, and Energy UK to ensure that their views were taken into account in designing the consultation.

We have also worked closely with Ofgem to ensure that our work complements activity as part of its Consumer Confidence programme and avoids unnecessary duplication, while recognising the distinct roles of our organisations.<sup>8</sup>

We also received correspondence from several suppliers and other stakeholders setting out key issues for consideration from their perspective. We thank all stakeholders for their engagement so far, and have taken their feedback into account in designing this consultation.

This consultation sets out some of the key areas under consideration for changes to the Rating. Where we ask questions about specific measures, we indicate whether we have an initial view on the subject.

A number of stakeholders expressed a desire to see updated and improved guidance for suppliers and other interested parties on the methodology and

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<sup>7</sup> Ofgem (2024) [Consumer Confidence 2024](#)

<sup>8</sup> Ofgem (2024) [Consumer confidence: a step up in standards](#)

intent behind the star rating. We're happy to commit to sharing further guidance and information for suppliers, third parties, and consumers, and would welcome any feedback on structures and formats which would be helpful.

# Background

## Our methodology

The full current methodology for the Star Rating is available online [here](#)<sup>9</sup>. Current methodologies and weightings for each component are also available in the tables below for reference.

| Category             | Weighting | Metric  | Weighting within Contact Ease Score | Data source  |
|----------------------|-----------|---|-------------------------------------|--|
| Customer service     | 55%       | Average call waiting time   | 60%                                 | RFI  |
|                      |           | Email response time*  | 20%                                 | RFI  |
|                      |           | Social media response time*   | 20%                                 | RFI  |
| Complaints           | 35%       | Existing complaints ratio   |                                     | Ombudsman: Energy (OS:E), consumer service (CS), Extra Help Unit (EHU), Advice Direct Scotland (ADS) |
| Customer commitments | 10%       | Membership of the Energy Switch Guarantee, Vulnerability Commitment |                                     | Publicly available   |

\* Social media response time is included in star rating scores only if social media contacts make up over 5% of a supplier's total contact volume.

### Breakdown for small suppliers

| Category         | Weighting | Metric                     | Weighting within Contact Ease Score | Data source |
|------------------|-----------|----------------------------|-------------------------------------|-------------|
| Customer service | 90%       | Average call waiting time  | 60%                                 | RFI         |
|                  |           | Email response time        | 20%                                 | RFI         |
|                  |           | Social media response time | 20%*                                | RFI         |

<sup>9</sup> See [here](#) for the public-facing information on how the scores are devised, or [here](#) for the full methodological breakdown.

|                      |     |   |                    |
|----------------------|-----|---|--------------------|
| Customer commitments | 10% | Membership of the Energy Switch Guarantee, Vulnerability Commitment | Publicly available |
|----------------------|-----|---|--------------------|

\* Social media response time is included in star rating scores only if social media contacts make up over 5% of a supplier's total contact volume.

The star rating methodology has been reviewed regularly since we introduced the rating with some key changes made at various points:

- October 2018: reduced the threshold for automatic inclusion to all suppliers with over 25,000 meter points
- June 2021: Webchat exploratory review, which concluded that comparable metrics were not available to introduce a webchat metric at that stage.
- January 2020: Added email and social media response times, membership of vulnerability commitment.
- March 2023: Removal of billing and switching metrics, and reweighting of metrics. This placed more focus on ease of contact which was a significant challenge at the time, and to remove metrics in which there was limited differentiation in performance between firms.<sup>10</sup>

Since Q1 2024, Citizens Advice have also changed the format in which we publish historic Star Rating data on our website, which enables publicly accessible longer-term comparisons over the period covered by the Star Rating.<sup>11</sup>

We are always keen to understand how we can improve the rating and maintain its relevance for consumers, suppliers, and the public overall.

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<sup>10</sup> Citizens Advice (2023) [Decision Document on Revised Methodology for the Citizens Advice Star Rating](#) page 6

<sup>11</sup> Citizens Advice (2024) [Historic Star Rating Data](#)



# The consultation process

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## How we make decisions about the rating

As in our previous consultations, we will consider changes to metrics by following a number of high level principles. We prioritise metrics that are important to the consumer experience in each category.

Proposed metrics need to pass two tests:

- Are the metrics appropriate measures of performance?

Any metrics must measure areas of service which are important to consumers, including those in vulnerable circumstances, and be simple enough to be readily understood.

- Is data available which is robust and comparable across a broad range of suppliers?

Data must be available to accurately reflect the performance of each supplier in the relevant areas. We are keen to understand supplier views on this in response to the consultation, and it will be tested through an exploratory request for information (RFI) ahead of our final decision.

We also assess what types of data would be available to measure performance for each metric. There are two main approaches to this:

1. **Quantitative supplier performance data.** This is gathered from third party information, or via RFIs.
2. **Assessment of supplier services.** This is how we currently assess performance in the 'customer commitments' category.

We have favoured the first approach where possible, as this is based on actual supplier performance. This also improves transparency by making more performance information available, in line with our objectives for the rating.

We have set out some initial views on these areas in this consultation, and welcome further evidence from stakeholders in their responses. We will set out a clear rationale for our final approach in our decision document.

## Research and insight drives our decisions

We're grateful for the research and insight that has already been shared by stakeholders in response to our review, and welcome more being shared in response to this consultation.

We also draw on our own insight from user testing and web analytics, as well as research such as the customer satisfaction survey we co-commission with Ofgem. This has supported some of the areas we're including in our review, including key driver analysis which shows that satisfaction is driven to a significant extent by billing, contact ease and smart meters.<sup>12</sup>

We are considering further research to address knowledge gaps that we identify in this review. However, it is important to note that different research in relation to customer service can result in findings which differ to some extent. Our final decisions on methodology will be based on our assessment of what approach best meets our legal responsibilities and our overall objectives for the rating.

## Timescales for changes

Some of the potential changes to the Star Rating could be made quickly, while others may take much longer. Short-term changes are those where we could make changes to the methodology rapidly, either through reweighting or re-presenting existing data which we already collect. For the most part, these are less ambitious in terms of adding in new metrics or future-proofing the Rating for a changing market.

Medium and longer-term activity would need further data, either through exploratory RFIs to suppliers or through extensive work with our partners. The length of time changes might take does not affect our view on the topic. Longer-term changes may arise in situations where we believe that there is a case to be made for including a metric, but the data cannot be gathered consistently across all suppliers. In such cases, we may decide to continue ongoing consideration ahead of the next review (as was previously the case with our exploratory review of webchat in 2021).

Our usual approach is to make all changes to the Star Rating simultaneously, but given the breadth of issues under discussion in this review, we are seeking views

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<sup>12</sup> BMG Research (2024) [Energy Consumer Satisfaction Survey: January to February 2024](#), Ofgem and Citizens Advice, page 22.

on whether we should aim to implement all potential changes simultaneously (which is helpful for consumer and supplier clarity) or aim to work them into the Star Rating in a structured and ongoing manner.

**1. Should we plan to make as many changes to the Star Rating as possible simultaneously, or to introduce new measures in an ongoing manner, when possible?**

**Initial view:** Our preferred approach is to make any changes at the same time, in order to allow clarity for consumers and backwards comparisons. We think it is also helpful for suppliers in planning their operations and anticipating any necessary changes. We are nevertheless keen to seek views on this matter, since some of the potential changes we discuss in this consultation could take longer to implement than others.

**Indicative timetable**

| <b>Month</b>                 | <b>Activity</b>  |
|------------------------------|--|
| October / November 2024      | Workshops<br>Collate Workshop Feedback<br>Stakeholder meetings |
| December 2024 / January 2025 | Consultation Paper   |
| February 2025                | Potential Commissioned Research<br>Exploratory RFIs            |
| March 2025                   | Decision document and finalised new RFI                        |
| June 2025 onwards            | New data collection begins                                     |

**This timeline is subject to change.**

## **How to respond to this consultation**

Please respond by email to: [energyretail@citizensadvice.org.uk](mailto:energyretail@citizensadvice.org.uk)

The deadline for responses is: **5pm on Thursday 30th of January**

If preferred, you can respond by post to:

Will Johnstone

Citizens Advice

3rd Floor, 1 Easton Street

London

WC1X 0DW

If you would like to respond in another format, please contact  
[will.johnstone@citizensadvice.org.uk](mailto:will.johnstone@citizensadvice.org.uk)

# Changes to existing measures

## Complaints

The complaints score is the largest individual measure which feeds into the Star Rating. Energy suppliers provide their customer numbers to Citizens Advice through responses to our statutory Requests for Information. We use these figures to work out their complaints per 10,000 customers. Complaints are counted as issues which come through to the Citizens Advice Consumer Service, Advice Direct Scotland, the Extra Help Unit (delivered by Citizens Advice Scotland), and the Energy Ombudsman, each of whom provide data to Citizens Advice on a quarterly basis.

When a consumer contacts a third party to seek assistance on an aspect of their relationship with their energy supplier, we think this generally demonstrates that a failure has occurred in service delivery or an opportunity has been missed in prevention. We think this means it is appropriate for us to count such contacts as complaints (with the removal of specific advice and information cases, as detailed below).

We also think our complaints measure is representative of overall consumer experience and satisfaction. We expect that suppliers with satisfied customers are less likely to receive complaints, and more likely to be able to deal with them in a timely way, before their customer contacts a third party for support.

This data is weighted as follows:

| Organisation  | Data Type   | Multiplication Factor | Notes  |
|---|-------------|-----------------------|--|
| Citizens Advice consumer service / Advice Direct Scotland | Advice Only | 10                    | Energy Cases where the consumer may have not contacted the supplier previously. Advice is given to the consumer on what they can do to resolve their issue. Cases with a Distribution and Advice/Information categories are removed from these data. This data is collected quarterly and any duplicates within the quarter are removed from the data. |
|   | Company     | 25                    | Cases where the consumer has contacted the   |

|                  |              |    |   |
|------------------|--------------|----|---|
|                  | Referral     |    | supplier, and the issue has not been resolved but the consumer is still on supply, hasn't been identified as vulnerable and also does not fit the criteria for the Energy Ombudsman. Cases with a Distribution or Information code are removed from this data. This figure is collected monthly, and duplicates within each month are removed from the data.  |
| Extra Help Unit  | Complaints   | 25 | Complaints where the consumer has been disconnected, received a threat of disconnection, or is considered to be vulnerable based on either personal circumstances or their difficulty managing the issue themselves.<br><br>Only complaint call types are included - enquiries and 'ask the advisor' cases are excluded. Cases with a Distribution or Information code are removed from this data. Cases with a Suspected Meter Interference sub-code are also removed. |
| Energy Ombudsman | Closed Cases | 30 | All domestic Energy Ombudsman cases completed within the reporting quarter, with the exclusion of cases where the signposting has been recorded as deadlock.<br><br>Suppliers can raise any queries with the Ombudsman during the investigation period. Citizens Advice will receive the data after all the relevant cases are complete, and at a point where the Ombudsman will no longer be accepting challenges on these cases.                                      |

Cases which are grouped under the Advice and Information codes by the Consumer Service, Advice Direct Scotland, or the Extra Help Unit are excluded from the Star Rating (for example, a consumer looking for readily accessible information such as a supplier phone number).

A dispute process is in place for suppliers to state that a specific EHU or Consumer Service doesn't apply to them at the time that a complaint is received - this is used rarely. Priority cases where a consumer is off-supply or at imminent risk of going off-supply are sent to the Extra Help Unit immediately in accordance with the service design. There is no requirement for the consumer to have raised their case with their supplier in the first instance. These arrangements ensure that the Extra Help Unit can focus on delivering the

time-critical service of getting disconnected customers back on supply and to ensure that consumer safety is at the core of the service.

### **Stakeholder feedback**

We have received feedback from suppliers and other stakeholders about the complaints metric, weightings, and approach to complaints that the Star Rating takes. That feedback can be broadly summarised as follows:

- Some suppliers say that their business models or customer bases make it more challenging for them to succeed in the Star Rating, especially where they have a lot of prepayment customers.
- Some suppliers say that the higher scores for complaints are unattainable in a changed market landscape where complaints are at a higher baseline.
- Some suppliers express concern that Ombudsman cases or Extra Help Unit cases are weighted too highly, including EHU affordability cases where the consumer hasn't first spoken to their supplier.
- Some suppliers argue that complaints score thresholds group suppliers too closely together, and that as a result the complaints score is not acting sufficiently to distinguish between good and poor performance.
- Some suppliers believe that complaints should be classified in the same manner as the Ofgem Complaint Handling Standards, and should draw from the same data that they submit to Ofgem on complaints.
- Stakeholders expressed particular concerns about new dispute processes which could be time-consuming, used only by some suppliers, and ultimately achieve little for consumers.

At this stage we continue to think it appropriate that cases which go to the EHU without initial contact with the supplier are counted in the Star Rating. This is because, as mentioned above, we believe that they indicate a supplier failure in their relationship with their consumer. Where a consumer believes that they cannot resolve their issue by speaking to their supplier in the first instance, for any reason, our position is that something has gone wrong regardless of whether they've actually spoken to that supplier.

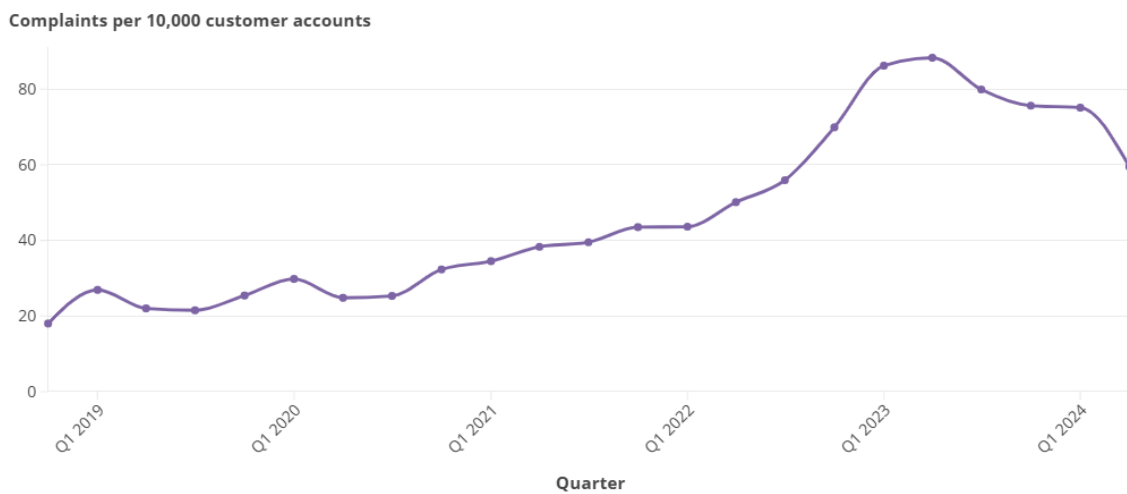
In addition, we are not at this stage suggesting that we introduce broader dispute mechanisms for priority cases due to the likely resource impact on first and second-tier advice providers. We have not received evidence that the dispute process is not working as intended.

We are also not proposing to use Ofgem’s direct complaints data. These complaints are drawn from supplier’s self-reported metrics. Where possible, we prefer to form the star rating from objective data drawn from external and impartial third parties. Our approach aligns with our unique legal responsibilities in relation to complaints data, and enables a level playing field between suppliers (since all complaints are interpreted in the same way). It also ensures that suppliers can be scored even if they do not submit data.

In other areas we are considering making changes in response to the feedback we’ve received so far.

### Complaints thresholds

We have not changed the thresholds for complaints since launching the Star Rating. The energy market has changed in that time, though the graph below shows that complaints are now falling after the peak of the gas crisis. However, we recognise some suppliers are concerned that the thresholds are harder to meet, including those who argue 5 star performance is now unachievable.



Note: Only suppliers with more than 25k customer accounts are included in this graph. The average has been calculated by dividing the total number of weighted complaints by the number of customer accounts for all suppliers with over 25,000 customer accounts and then divided by 10,000 to reach a ratio per 10,000 customers.



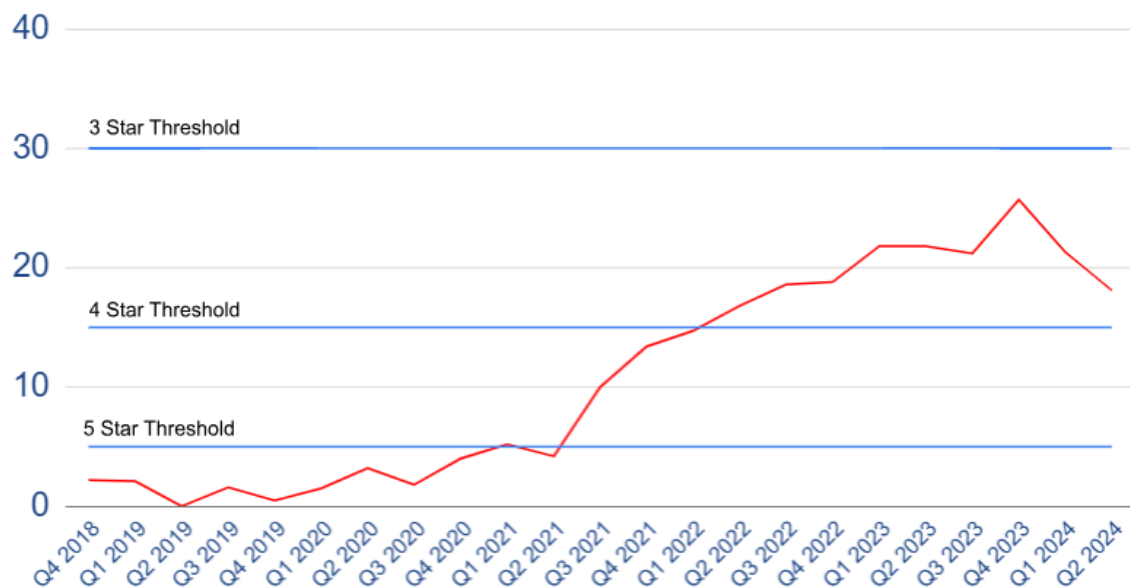
## 2. Should we change the thresholds for the top and bottom levels of complaints? If so, at what level should the revised thresholds be set?

**Initial view:** We are not minded to change these thresholds. We are concerned that changing the thresholds would send the message that higher levels of complaints are an expected feature of the energy market, which could undermine consumer trust. Equally, there are encouraging early signs that many



suppliers are improving their complaints ranking over time, including top scoring firms. We are concerned that moving the goalposts on complaints risks undermining the hard work that some suppliers have put into improving their complaints score.

Lowest Complaints Per 10,000 Score in the Star Rating Q4 2018 to Q2 2024



### Half stars for complaints

An alternative approach would be to allow half-stars to be scored for complaints (1.5 stars, 2.5 stars, etc). This would have the effect of permitting additional distinction between suppliers who might otherwise score the same despite differences in their complaints per 10,000 customers (particularly for those suppliers who score lower on complaints).

We have modelled the impact of introducing half star scores between thresholds on the Q2 2024 star rating, while leaving the top and bottom bands untouched. This showed that the aggregate impact of this change would be small, with average overall star ratings falling by a small amount (0.09 points). There are suppliers who benefit from this approach and those who lose out (with a range of changes in overall rating from +0.18 to -0.35).

We are keen for feedback on this approach, which would mean our complaints scoring would be different to the method used for other metrics (which use whole stars).

### **3. Do you agree with the approach of incorporating half stars for complaints scores into the Star Rating? Do you think there are risks or potential unintended consequences for this approach?**

**Initial view:** There are some benefits to this approach. It would achieve the desired outcome of allowing further differentiation, and we think it would be easy for consumers to understand. It is important to stress that some suppliers would lose out under this approach.

#### **Weighting for Extra Help Unit (EHU) cases**

At present, complaints to Citizens Advice and Advice Direct Scotland are weighted equally, with advice cases weighed less than company referrals. Complaints to EHU are weighted equally to company referrals by Citizens Advice and Advice Direct Scotland. Complaints to the Ombudsman are weighted most heavily.

This weighting is reflective of the consumer impact and stage of the complaints journey - it is more stressful and time-consuming for the consumer to have to take their case to the Ombudsman process than to call the Consumer Service for some initial advice, and the supplier has already had a significant period to resolve the issue.

Some suppliers are concerned that the weighting for Extra Help Unit cases is too high, especially given that EHU can receive priority cases (if the consumer is off-supply) which have no dispute process available, and where it is possible the supplier may not have had previous sight of the case. We recognise that recent cost of living pressures have made these cases more challenging for suppliers.

### **4. Should we make changes to the weightings for complaints made to specific third parties? Please indicate which third parties you would suggest we reweight, if any.**

**Initial view:** We are not currently minded to make changes to the weighting for EHU cases, given the consumer impact of being off-supply, and our view that there are actions suppliers can take to avoid this outcome for consumers. Smart meters and regulations around self-disconnection should enable suppliers to take more proactive steps to support these customers. However we are keen to make sure that complaints performance is more transparent in future.

An alternative approach we are considering is changing the way the complaints measure is presented so that it is clearer about which types of complaints are driving performance. Rather than the current composite score for all types of complaints, it would present data on each type of complaint separately (similar to how different customer service channels feed into an overall score for the ease of contact measure). This would not change the weighting of the complaints types, but would change how the weighting is presented.

We are also considering how we might measure supplier performance for EHU cases based on prepayment or financially vulnerable customers (e.g. those who receive Warm Home Discount).

Both options will require further modelling to understand their feasibility and impact. We welcome feedback from stakeholders on their views on this approach.

### **Ombudsman metrics**

Some stakeholders suggested alternative Ombudsman metrics which warrant consideration for the Star Rating, specifically upheld rates and signposting rates. These metrics are already collected by the Ombudsman, and so would be possible to incorporate.

#### **5. Should we consider adding further Ombudsman data into the Star Rating? If yes, which metrics would warrant consideration, and where should we aim to include it?**

**Initial view:** We're sceptical of the case for changing the data we use in relation to Ombudsman cases. Ombudsman contacts are high in general at the moment, and while they do not uphold every case, the Ombudsman has a high upheld rate, suggesting that there would be little benefit from changing the data we use.

We have previously considered using upheld cases, but have been concerned that the timing and resolution of these cases ultimately sits with suppliers in a large number of instances. As a result, there is a risk that including them may create incentives for suppliers to delay resolution to a case to ensure healthier scores for the following quarter. Stakeholders confirmed this was a possibility. More generally, it would also introduce a delay in complaints feeding through to a supplier's score, making the information less timely for consumers.

**6. Is there anything else you would like to tell us about our approach to complaints? Please include any additional relevant evidence you would like to share.**

## Ease of contact

The Ease of Contact aspect of the Star Rating makes up 55% of the overall score, and is split into three measures at present.

| Category                    | Weighting | Metric   | Data source |
|-----------------------------|-----------|--|-------------|
| Average call waiting time   | 60%       | The average (mean) wait time to answer publicly available inbound, domestic customer initiated, telephone services (excluding dedicated inbound sales lines and sales options in the Interactive Voice Recording (IVR)). Please exclude any time in which the consumer is routed through an IVR. | RFI         |
| Email response time*        | 20%       | The ratio of emails received during the reporting period which were answered substantively within 2 working days of receipt, excluding automated emails.   | RFI         |
| Social media response time* | 20%       | Average (mean) time taken to substantively answer a direct social media message during the reporting period.   | RFI         |

\* Social media response time is included in star rating scores only if social media contacts make up over 5% of a supplier's total contact volume.

Data is collected from suppliers using our statutory Request for Information powers, and accompanied by guidance on how suppliers should respond. We also collect supplemental data which we have not historically published, as part of the same RFI process. The customer service scores are not weighted for customer numbers and so suppliers are effectively competing on two aspects alone: what percentage of emails they respond to substantively within two working days; and how fast they answer the phone to customers.

For a number of reasons discussed later in this consultation, the social media score is rarely used.

### Stakeholder feedback

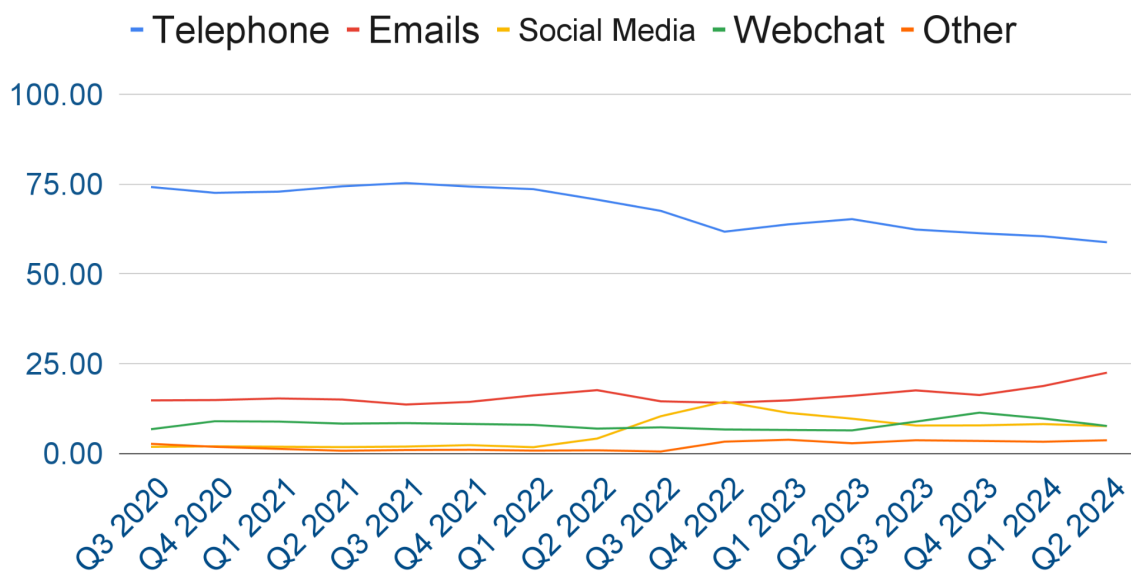
Feedback on contact ease and methods we've received from suppliers and other stakeholders can be summarised as follows:

- Some suppliers feel that the focus on reaction speed within the Star Rating means that the quality of the actual response by suppliers is missed, though this was disputed by other suppliers.
- Suppliers are using contact channels beyond those narrowly measured by the Star Rating, and feel these should be taken into account, including webchat, WhatsApp, and in-app messaging among others.
- A limited number of suppliers dispute that telephone wait times are as important a contact channel as we weigh them in the Rating.
- Many suppliers pointed out that the social media component is rarely used at present.

We recognise the diverse range of channels used in the market, though some (telephone and email) are required by Ofgem through the Complaints Handling Standards. A key challenge for the Star Rating is the need to bring together information covering every supplier and assess these objectively.

To demonstrate this point, we are publishing aggregated data showing the breakdown of contact channels across the energy market. This graph shows the ways in which contact channels have changed over the past four years, based on the supplementary data we collect alongside our RFIs to suppliers.

Contact Methods as a Percentage of Total Contacts, Q3 2020 to Q2 2024



As shown in the graph, the market has shifted since 2020. Telephone contact remains the main way for consumers to get in touch with their supplier, but this has reduced to just under 60% of contacts, while email has increased from 14% to 18% of contacts. Webchat and social media contacts fluctuate at around 10% each. We welcome evidence on any ways that stakeholders project that customer contact channels will continue to shift in the coming years.

### **Telephone waiting times**

Some suppliers have questioned the extent to which the ease of contact measure focuses on telephone waiting times. As shown by the data we collect above, the current weighting of 60% matches the percentage of consumer contact which occurs across the energy market by telephone. We recognise that as this is an aggregate figure the use of contact channels by individual suppliers will differ. For Q2 2024, suppliers in the main table reported that telephone contacts made up between 90.2% and 32.5% of their total contact volumes.

Notably, telephone is a vital contact channel for some disadvantaged consumers including digitally disadvantaged consumers, those who speak English as an Additional Language and need a translator, and prepayment (PPM) customers who can have urgent needs to get through to their supplier if they are at risk of disconnection. At the height of the gas crisis, we saw long wait times and consumers who were unable to reach their supplier and were forced to contact third parties, though telephone contact has improved significantly since then.

The thresholds for scoring telephone wait times were set based on previous research with consumers. We've seen recent research that consumers are comfortable waiting for longer periods than the current scoring methodology suggests.

#### **7. Are there any changes you would propose to the telephone waiting times component of the Star Rating? Please give reasons if so.**

**Initial view:** We expect telephone wait time should remain a core metric within the contact ease measure, given its importance to consumers. However, adding further contact channels (see below) would mean we need to consider how different channels are weighted. We welcome further views on the appropriate weighting.

We are sceptical of the case for changing scoring thresholds for telephone waiting time. We are concerned that changing the scoring thresholds for the

telephone waiting times metric could undermine the significant improvements most suppliers have made on this score. We're pleased with the improvements that telephone waiting times have seen over the past year, and we have heard from suppliers that they have dedicated significant resources to improving their telephony.

It would also risk placing the measure out of step with Ofgem's regulatory changes on customer contact (which makes clear to suppliers that waiting times in excess of 5 minutes will trigger regulatory engagement)<sup>13</sup>. We welcome further evidence on consumer expectations of telephone customer service.

## **Social media**

At present the Star Rating includes social media responses times over two specific contact channels (X, formerly Twitter; and Facebook), and only where these forms of social media, taken together, make up more than 5% of a supplier's total contact. Only one supplier is currently hitting this benchmark. Part of the issue is that the use case for some social media channels has changed substantially over the past few years.

### **8. Should we remove the social media component entirely? Alternatively, should we explore including other social media channels such as WhatsApp into the social media component?**

**Initial view:** Either option would likely be feasible. Not all suppliers are using WhatsApp but we understand some are using it heavily and would be likely to benefit. If this proposal has support across the market and can be measured consistently then we have no concerns about implementing it. Equally, we welcome suggestions on other social media channels to include if suppliers are using those at scale.

We intend to issue an exploratory RFI seeking information on the specific metric we could incorporate here.

## **Webchat and in-app messaging**

Many suppliers have invested very heavily in their webchat and in-app messaging functionality, and while the consumer contact experience is likely to differ slightly between these channels, the customer service agent experience

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<sup>13</sup> Ofgem (2023) [Guidance on expectations for consumers to be able to contact their supplier](#), page 11, 1.44

will be similar. Our data indicates that webchat is currently around 10% of contacts across the market.

**9. Should we include webchat and/or in-app messaging in the customer service metrics score? What weighting would you recommend applying to these? Are suppliers collecting sufficient data to allow comparability across the market?**

**Initial view:** We are keen to explore the inclusion of webchat and in-app messaging further, if appropriate data can be identified. Our attempts to include webchat in 2021 failed due to a lack of comparable data between suppliers.

Our initial view is that including both webchat and in-app messaging in the same metric would be preferable. We will need to conduct exploratory RFIs on both channels to test this metric further.

**Weighting of the contact ease measure within the rating**

We've seen varying research on the importance of telephone wait times and email response times to consumers. Some of this suggests these metrics are overvalued compared to other aspects of service, while other research suggests wait times are more important to consumers. We are pleased that contact wait times have improved significantly across the market since our previous review of the Rating, and as a result we are interested in further evidence on what weighting we should give to measures of contact ease.

**10. Should we consider reweighting the 'contact ease' element of the Star Rating? If so, what balance should we strike between contact ease, complaints, and customer commitments?**

**Initial view:** Changes elsewhere in the Star Rating (for example to add in new measures) would necessitate changes to the weightings for other components. We are keen to test the view of stakeholders on whether the current weightings are appropriate.



# Adding new measures

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We received feedback around a wide variety of subject areas which suppliers and other stakeholders were keen that we should explore as part of this review, and welcome further contributions. Some additional options are set out here. These are primarily at an earlier stage of development than the proposals previously discussed, and so we welcome feedback which would indicate how they sit alongside the existing Star Rating.

Suppliers and other stakeholders raised the following points in our workshops and through further correspondence:

- Some suppliers highlighted the lack of an overall customer satisfaction measure in the Star Rating.
- Some suppliers are concerned that the customer service score has too negative a focus on consumers who need to contact their supplier, and therefore ignores customers who are having a positive experience.
- Dedicated star ratings which distinguish between the kinds of suppliers available to consumers (based on supplier size, prepayment availability, or similar) were suggested in different ways by a variety of suppliers.
- The exclusion of billing means that routine supplier interactions with their customers are not captured in the Star Rating.
- The removal of the switching metric means that switching is not measured in the way that some suppliers would prefer.
- Smart meter connectivity and other metrics around experiences with smart meters are not currently captured.
- Limited feedback was shared that the current RFI system raises the scope for suppliers to submit poor quality data, inadvertently or intentionally.

We think the Star Rating already indirectly takes account of positive aspects of customer relationships, particularly through our complaints measure, as set out on page 12. However, we are exploring new measures which would enable us to consider a broader range of consumer outcomes in key areas of service.

We're interested in further feedback around how the Star Rating could capture positive relationships with energy customers.

## Customer satisfaction

Some suppliers have suggested that we should consider incorporating customer satisfaction metrics into the Star Rating. Alongside suggestions that such metrics would support us in achieving our objectives for the Star Rating, this feedback suggests that our joint work on the Energy Consumer Satisfaction Survey with Ofgem means that this would be simple to achieve. Suppliers in favour of this approach also felt it would reduce conflicting information between different measures of energy supplier performance.

### **11. Would you advocate including customer satisfaction metrics into the Star Rating? If so, how would you envisage that these would improve consumer outcomes and avoid conflict with other publicly available customer satisfaction metrics?**

**Initial view:** There would be substantial methodological, financial, and technical challenges to incorporating customer satisfaction into the Star Rating. This is because it is challenging to deliver a quarterly survey which gathers sufficient responses from customers of a broad range of suppliers to be robust.

The Energy Consumer Satisfaction Survey, which we commission jointly with Ofgem, publishes supplier-level results for those suppliers who have more than 100 customers as survey respondents. Despite considerable financial outlay and resourcing, it was only able to publish results for 7 suppliers in the most recent wave, far fewer than the 15 included in the main Star Rating.<sup>14</sup>

Overall satisfaction scores are likely to be impacted by a wide range of factors, including price and product. The core purpose of the rating is to act as a timely measure of customer service, including to be considered *alongside* price and product characteristics when making decisions to switch or use a new service. Therefore for the purposes of the rating we think a customer satisfaction metric would need to be based on the service experience of those customers who've recently engaged with their supplier. 32% of customers had contacted their supplier in the previous 3 months in the latest wave of the Energy Customer Satisfaction Survey,<sup>15</sup> meaning it would be even more challenging to access a sufficient sample size for customers of smaller firms who had recently engaged with their supplier.

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<sup>14</sup> Ofgem (2024) [Customers' satisfaction with their supplier - supplier level findings](#) page 5

<sup>15</sup> Ofgem (2024) [Energy Consumer Satisfaction Survey – Findings Report – July 2024](#) page 30

The publication of customer satisfaction data by Ofgem means it is already available as a resource for consumers which can complement the rating, and we will continue to work with Ofgem to ensure the difference between these data sets is clear to users. Furthermore, there are comparison tools available to consumers which include measures of satisfaction, though we note these rely on small sample sizes and are published less frequently than our star rating<sup>16</sup>.

While we strongly believe that all suppliers can improve customer satisfaction through improving their products and service, we've also heard a range of views on the extent to which different suppliers may have different 'ceilings' for overall satisfaction, based on customer characteristics (such as levels of engagement and financial precarity). Key driver analysis of the Energy Consumer Satisfaction Survey that we co-commission with Ofgem found that while individual actions of energy suppliers make the biggest difference to customer satisfaction, 'all else being equal, the more financially secure a consumer is, the more likely they are to be satisfied with their supplier.'<sup>17</sup>

We therefore welcome all views on this question.

**12. Are there other methods of measuring positive aspects of the consumer-supplier relationship which you would recommend we consider? Please include specific metrics where possible.**

**Initial view:** Some suppliers have indicated they are already measuring First Contact Resolution scores. We are interested in gathering further information on this, and may conduct exploratory RFIs to see to what extent these are collected across the market and how consistent these measurements are.

## Billing

Prior to the Q3 2022 a metric on billing was included in the star rating. We included a measure of the proportion of customer accounts which had received an accurate meter reading (from a smart meter, customer meter read, or supplier meter read) within the last year. This metric was removed from the star rating as of the Q4 2023 iteration. The reasoning can be summarised as follows:

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<sup>16</sup> For example: Which? (2024) [Best energy suppliers for 2024](#)

<sup>17</sup> BMG Research (2024) [Energy Consumer Satisfaction Survey: January to February 2024](#), Ofgem and Citizens Advice, page 20

- Supplier performance on this billing accuracy measure was almost universally high with little variance. The metric therefore provided little in the way of differentiation between suppliers and simply inflated overall scores.
- Website analytics showed that the billing metric was less heavily used, and that users overwhelmingly looked at supplier scores for the Complaints and Customer Service metrics.
- Reducing the number of metrics included in the star rating also provided an additional incentive for improvement in the areas of complaints handling and customer service.
- There was also a concern that the metric used to generate the billing score did not meet consumer's expectations around accurate billing.

Our position at the time was founded on the need to focus the efforts of suppliers on key metrics which best reflect their abilities to effectively help their customers in a time of unprecedented market disruption.<sup>18</sup> However, the market has again undergone significant changes since our last review.

Since March 2024, billing issues have been the single most common type of issue our consumer service advisors help people with. In the same period, the total number of contacts to local Citizens Advice offices relating to a billing issue increased by nearly 250%. Billing issues as a proportion of overall issues increased by 28% between the two periods.

As a result, we are interested in whether we should consider reintroducing a billing metric, and if so, what it should measure.

### **13. Do you support the reintroduction of a billing metric? If so, what should it measure to drive improvements for consumers?**

**Initial view:** It is clear from the previous measure of billing accuracy that this was not driving consistent improvements from suppliers or addressing consumer needs. We would consider revising the timescale for the previous billing metric into a shorter timeframe (such as 6-monthly or quarterly) in order to drive improvements, and would welcome feedback on the viability of this measure.

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<sup>18</sup> Citizens Advice (2023) [Decision Document on Revised Methodology for the Citizens Advice Star Rating](#)

We would also be interested in other suggestions for a billing metric, particularly if it involves third-party data and would meet our objectives for helping consumers and driving improvements within energy suppliers. We would conduct an exploratory RFI for any proposed metric.

## Switching

Prior to the Q3 2022 a metric on switching was included in the star rating. Some suppliers have expressed views that switching should be reintroduced into the Star Rating as a dedicated measure.

The previous measure was removed for 3 key reasons:

- Supplier performance in this area had improved significantly and there was less differentiation between firms.
- It measured switches completed in 21 days, which was outdated following the move to faster switching.
- Switching was at very low levels in the market at the time of our last review, and its inclusion felt disproportionate.

Switching is still included to some extent, via scoring for membership of the independent Energy Switch Guarantee (ESG).<sup>19</sup> Switching levels have increased significantly since our last review, but remain below historic levels.<sup>20</sup> We have not received any evidence from suppliers so far as to whether our approach to switching remains appropriate. As a result, we are asking the following question:

**14. Is the current approach for measuring switching through membership of the Energy Switch Guarantee working? Please share any suggestions for improvement.**

**Initial view:** Our current view is that the approach seems to be working well, and separate statistics from ESG indicate that switching is, for the most part, operating well in the market.<sup>21</sup> This has positive impacts for consumers who switch suppliers.

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<sup>19</sup> Energy UK (2024) [Energy Switch Guarantee](#)

<sup>20</sup> Energy UK (2024) [October 2024 Electricity Switching Figures](#)

<sup>21</sup> Energy UK (2024) [Energy Switch Guarantee Q2 2024 KPI Tracker](#)

## Smart metering

Smart metering is now an essential aspect of the domestic energy consumer experience. It is a key building block for innovation and low carbon technology, but we are also aware there are some significant challenges in the consumer experience.<sup>22</sup> Smart metering is not directly measured in any way in the current Star Rating.

In our workshops, suppliers suggested that smart meter connectivity or the proportion of smart meters working in smart mode could be used to distinguish between supplier performance. Government data shows that 10% of smart meters are not operating in smart mode<sup>23</sup>, and through our recent research, we know that around 20% of people with a smart meter are reporting having to provide manual meter readings to their supplier<sup>24</sup> (with implications for billing accuracy as well as the functionality of their smart meter). Our recent report on consumer billing issues shows a significant number of billing contacts by customers who have smart meters.<sup>25</sup> Ofgem recently published data on the proportion of smart meters operating in smart mode, which shows a significant range in performance between suppliers (83.7% - 97.4%).<sup>26</sup>

We're aware that some smart metering issues are attributed by suppliers to the Data Communications Company (DCC), which provides essential services for smart meters, and that there's anecdotal evidence that these issues vary by location.

Another approach would be to include data on supplier progress with the rollout of smart meters. Suppliers have rollout targets to meet and an overall aim for at least 75% of homes to have meters installed by the end of 2025.

### **15. Do you support including smart meter metrics into the Star Rating? Please suggest any specific metrics which you would like to see considered.**

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<sup>22</sup> For example, see Citizens Advice (2024) [Get Smarter: Ensuring people benefit from smart meters](#)

<sup>23</sup> DESNZ (2024) [Q3 2024 Smart Meters Statistics Report](#)

<sup>24</sup> Citizens Advice (2024) [Get Smarter: Ensuring people benefit from smart meters](#)

<sup>25</sup> Citizens Advice (2024) [Footing the bill: How the energy bill protection gap is putting strain on households](#)

<sup>26</sup> For example, Ofgem currently publishes the following: Ofgem (2024) [Smart meter transition and the Data Communications Company \(DCC\)](#)

**Initial view:** We are keen to include metrics around the number of smart meters operating in smart mode if possible, and will consider those published by Ofgem in more depth. We would be interested in feedback from suppliers on these statistics, including the extent to which they are within the control of suppliers, and if this is likely to differ between firms. We are also interested in the geographical distribution of smart meter issues, and may include questions about this in an exploratory RFI.

We are sceptical of including measures of smart meter rollout in the rating. Unlike smart meter operation which is an ongoing, business as usual activity affecting the majority of customers, meter installation is a one-off activity for consumers. There is currently a lack of clarity on rollout targets and approach beyond 2025, and the varying degrees of progress by suppliers in the rollout and differing customer bases could make it challenging to meaningfully compare performance.

# Other changes to the rating

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## Dedicated star ratings based on supplier characteristics

Some suppliers and stakeholders have told us that changing the presentation of the Star Rating to make distinctions between specific supplier characteristics would provide clarity for consumers. The suggested distinctions are:

- A dedicated Star Rating for prepayment-only suppliers (of which there are currently two).
- Further distinction based on supplier size, which would involve adding medium suppliers into their own table, as the Star Rating already separates very small suppliers with fewer than 25,000 customers.
- Redefining supplier size based on other categorisations, such as the Ofgem definitions of supplier size.
- Calculating or adjusting complaint metrics (such as EHU complaints) based on prepayment customer numbers or by numbers in receipt of Warm Home Discount.

While there are clear presentational benefits for some suppliers if they are placed in their own table, this would not affect their scores and as a result it is likely we would also need to produce a table comparing all suppliers to prevent consumers from becoming confused.

We would be grateful for wider feedback from stakeholders on these proposals in order to test their support across the market. Separating suppliers from one another could potentially affect the rankings overall (by removing some suppliers from the main table) and in some versions of this proposal, there would be no main table at all but rather a series of separate tables based on supplier size or other characteristics.

### **16. Are there benefits or drawbacks to presentational changes which would result in increasing the distinctions between suppliers based on agreed characteristics? If so, which characteristics should we prioritise?**

**Initial view:** Our initial view is that it is likely consumers and other stakeholders (including media) would find this confusing and we are therefore not minded to pursue this option at this stage.



Separating suppliers based on their size would have presentational impacts, and would need testing directly with consumers. At present, the small suppliers are separated because their scores use a different methodological approach which makes it unfair to compare them with others.

We have had feedback from a variety of smaller suppliers that they value the current level playing field which means that they can compete on customer service against larger suppliers.

We would be interested in feedback on the benefits or drawbacks of the level playing field.

### **RFI responses**

We've had some supplier feedback that the self-reported nature of the data we gather from suppliers through RFIs raises the scope for suppliers to inadvertently misreport their data. A suggested solution is for director-level staff, who have specific legal responsibilities around reporting, to sign off on RFI submissions.

We have not seen evidence that this risk has led to data issues with RFIs, but we are keen to understand whether this is perceived to be a problem by other stakeholders.

#### **17. Should we consider requiring director-level sign-off on responses to our statutory RFIs? Would this be a proportionate approach to the possibility of misreporting?**

**Initial view:** We take the possibility of misreporting very seriously, and have the power to refer firms who fail to respond to information requests, or provide inaccurate data, to Ofgem. However, we would stress that this is not an issue on which we have received any evidence. We are keen to ensure that we are taking a balanced approach, and would have concerns about introducing a sign off regime which is out of step with Ofgem's own approach to RFIs.

We welcome feedback on this option or other methods of ensuring we prevent misreporting.

### **Final notes**

We hugely appreciate feedback on the issues we've discussed in this consultation from suppliers, advice organisations working directly with consumers, and our statutory partners. We're conscious that there may be views

relating to the Star Rating which were not covered in this consultation, including around further industry initiatives which may be of benefit to consumers and which we could include under the Customer Commitments element. We would be particularly interested in any initiatives around fuel mix, smart metering standards, or innovation in the energy market.

**18. Is there anything else you would like to share about how the Star Rating operates now, or could do in the future?**

**Contact**

If you would like to arrange a conversation about this consultation, please contact:

[will.johnstone@citizensadvice.org.uk](mailto:will.johnstone@citizensadvice.org.uk)

We will publish a summary of consultation responses alongside our response to this consultation. Please indicate if anything in your response is intended to be kept confidential.

# List of consultation questions

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1. Should we plan to make as many changes to the Star Rating as possible simultaneously, or to introduce new measures in a structured and ongoing manner, when possible?
2. Should we change the thresholds for the top and bottom levels of complaints? If so, at what level should the revised thresholds be set?
3. Do you agree with the approach of incorporating half stars for complaints scores into the Star Rating? Do you think there are risks or potential unintended consequences for this approach?
4. Should we make changes to the weightings for complaints made to specific third parties? Please indicate which third parties you would suggest we reweight, if any.
5. Should we consider adding further Ombudsman data into the Star Rating? If yes, which metrics would warrant consideration, and where should we aim to include it?
6. Is there anything else you would like to tell us about our approach to complaints? Please include any additional relevant evidence you would like to share.
7. Are there any changes you would propose to the telephone waiting times component of the Star Rating? Please give reasons if so.
8. Should we remove the social media component entirely? Alternatively, should we explore including other social media channels such as WhatsApp into the social media component?
9. Should we include webchat and/or in-app messaging in the customer service metrics score? What weighting would you recommend applying to these? Are suppliers collecting sufficient data to allow comparability across the market?
10. Should we consider reweighting the 'contact ease' element of the Star Rating? If so, what balance should we strike between contact ease, complaints, and customer commitments?

11. Would you advocate including customer satisfaction metrics into the Star Rating? If so, how would you envisage that these would improve consumer outcomes and avoid conflict with other publicly available customer satisfaction metrics?
12. Are there other methods of measuring positive aspects of the consumer-supplier relationship which you would recommend we consider? Please include specific metrics where possible.
13. Do you support the reintroduction of a billing metric? If so, what should it measure to drive improvements for consumers?
14. Is the current approach for measuring switching through membership of the Energy Switch Guarantee working? Please share any suggestions for improvement.
15. Do you support including smart meter metrics into the Star Rating? Please suggest any specific metrics which you would like to see considered.
16. Are there benefits or drawbacks to presentational changes which would result in increasing the distinctions between suppliers based on agreed characteristics? If so, which characteristics should we prioritise?
17. Should we consider requiring director-level sign-off on responses to our statutory RFIs? Would this be a proportionate approach to the possibility of misreporting?
18. Is there anything else you would like to share about how the Star Rating operates now, or could do in the future?

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Published December 2024.

Citizens Advice is an operating name of The National Association of Citizens Advice Bureaux.

Registered charity number 279057.