



Alexander Belsham-Harris <alexander.belsham-harris@citizensadvice.org.uk>

Energy supplier rating - consultation on proposed changes

Mark Adams <mark.adams@purepla.net>

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To: alexander.belsham-harris@citizensadvice.org.uk

Hello Alex

We've read through the proposed changes to the energy supplier rating. We think the majority of the recommendations are sensible and good for consumers. We've summarised our response to each of the consultation questions below. Where we have not responded this is because this isn't currently relevant to us. If you require clarification or wish to discuss any of our responses please let me know.

Background		
1	Do you agree with our aim to introduce changes from December 2017	Yes
Market Coverage		
2	Do you support our proposed threshold for mandatory inclusion in the rating of 50,000 domestic customers?	Yes
3	Do you support the voluntary inclusion in the rating? Do you support our proposed requirements for suppliers wishing to join?	Yes we support voluntary inclusion and the proposed requirements and we'd be interested in joining on a voluntary basis when we meet the thresholds.
4	Do you have views on how we could improve information we provide to consumers about suppliers with fewer than 50,000 customer who not voluntarily join?	If not already included you could show if the supplier is a member of the switch guarantee and any complaint data.
Metrics - billing		
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?	<p>We agree accuracy is important, although caution is needed as a bill could be accurate yet not simple to understand and therefore the consumer remains confused and/or not on a suitable tariff or paying the appropriate amount.</p> <p>As a new entrant with no smart meters we feel the hybrid option is relevant now with a view to changing that as SMETS2 meters are rolled out.</p>
6	Do you consider that timeliness bills is a suitable metric for assessing billing performance?	Yes.
7	Do you favour using timeliness, accuracy of bills, or both, as a metrics of supplier performance on billing? Are there other metrics that we should have considered?	We favour the use of both metrics as there is little consumer value to sending out bills on time if the content of that bill isn't accurate.

		A measurement of 'ease to understand' would be a useful metric.
Metrics - prepayment		
8	Do you agree that the Guaranteed Standards are an appropriate measure of supplier performance for prepayment?	
9	Do you support Option 1 (including prepayment where suppliers have sufficient PPM customers)? Do you support the proposed thresholds?	
10	Do you support Option 2 (scoring all suppliers according to billing performance only)?	
Metrics - customer service		
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)?	<p>No. We believe that digital services and how consumers want to interact with suppliers is rapidly changing. Research by companies such as Gartner shows that whilst phone contact remains important it's importance is diminishing, particularly with millennials adoption of messaging services.</p> <p>To have the only service measure a telephony one seems narrow and not representative of how consumers choose to interact with firms. It also doesn't encourage an omni-channel approach to service which is something consumers want and use.</p> <p>We recommend including chat and email measures. Email would be based on speed to respond. With chat it's more difficult as chat doesn't have to be a live service, it can be asynchronous. Therefore speed of answer wouldn't be appropriate, but a % responded to in x minutes/hours would be.</p> <p>We'd be happy to discuss our thoughts around this more if that would be of use to you.</p>
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?	<p>Yes. We would refer you to our response to Q11.</p> <p>In terms of the score, our service is 100% digital therefore we would want these additional channels to count for 100% of our score in this part of the rating.</p>
Metrics - complaints		
13	Do you agree that changing the weighting of OSE cases would better reflect	Yes.

	consumer outcomes? If not, please provide your reasoning.	
Other changes		
14	Do you agree with our proposed approach to non-compliance with information requests?	Yes.
15	Do you agree with our proposed approach for white label brands in the supplier rating?	Yes.
16	Are there any other changes to the supplier rating?	

Regards
Mark

purepla.net
07794 845599

