Citizens Advice Energy Supplier Star Rating

Decision Document August 2025





1. Introduction	2
1.2. Aims and objectives	2
2. Development Process to Date	3
3. Changes to the star rating	4
3.2. Weightings	7
4. Complaints	8
4.3. Complaints score upper/lower thresholds	9
4.4. Inclusion of half-stars	10
4.5. Weightings of types of third party complaints	10
4.6. Inclusion of additional Ombudsman data	13
4.7. Weighting of the complaints score	13
4.8. Access for All - Proposed Approach	14
5. Ease of contact	15
6. New metrics	20
6.1. Billing	20
6.2. Smart metering	23
7. Customer satisfaction	25
8. Customer Guarantees	28
9. Presentational changes	29
10. Thresholds for inclusion in the main star rating	30
11. Director-level Approval of RFIs	31
12. Next steps	31
12.4. Contact Information	32

1. Introduction

1.1. 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 domestic energy supplier star rating fulfilling part of these.¹

The star rating assesses suppliers in a range of areas of customer service to give an overall score. It is published on the Citizens Advice website and was first produced in 2016. We regularly review the rating to ensure it is meeting our aims and needs for consumers.

In December 2023, Ofgem introduced a requirement for all suppliers to publish information on their customer service performance, as measured by the star rating, on their websites. In December 2024, we published a consultation asking how the star rating could change to reflect developments in the energy market since the last review of the methodology in early 2023.²

Recent years have seen significant changes in the energy market, including energy prices, the number of suppliers in the market, and the types of products and services available. Our review has sought to understand how these changes had affected customer service provided by energy suppliers, and how those changes had affected consumers. In addition, we aimed to test the views of stakeholders and to understand support for proposals we were exploring.

1.2. Aims and objectives

- 1.2.1. The key objectives for the star rating are:
 - 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.

¹ Consumers, Estate Agents and Redress Act 2007

² Citizens Advice (2024) Citizens Advice Star Rating Review - Consultation 2024

- To encourage competition between energy suppliers based on key aspects of customer service.
- 1.2.2. The decisions we have made about the star rating seek to ensure that these key objectives can continue to be met. When assessing which metrics to include in the star rating we consider:
 - 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.
- 1.2.3. We have carefully considered all responses provided by stakeholders throughout this consultation period. The decisions outlined in this document reflect our view of the evidence, and how the star rating can best meet the needs of consumers.

2. Development Process to Date

- **2.1.** Below is a timeline of the development process to changes in the star rating:
 - September 2024 Pre-consultation research and engagement: We conducted an initial review of the star rating and its methodology, as well external research and feedback from suppliers.
 - October 2024 Supplier Workshops: We held two scoping workshops
 with domestic energy suppliers of all sizes, with combined market share of
 over 99%. We also held 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.

- **December 2024 Consultation:** The consultation closed in January. We received 16 responses, of which 11 were from energy suppliers, with the remainder from consumer groups and other third parties. We are publishing a summary of responses to the consultation alongside this decision document.
- **February 2025 Consultation Analysis:** We considered responses to the consultation and engaged with a number of stakeholders in further detail about their responses. The developing policy landscape has required careful consideration and ongoing engagement to ensure that any changes we might make are future proofed.
- March 2025 Commissioned research: We commissioned Opinium to survey a representative sample of 3,000 energy consumers who were in recent contact with their supplier to understand the perspectives of consumers and fill evidence gaps identified by the consultation. Findings are referenced throughout this document and a summary will be published shortly after this release. We've also drawn on findings from our energy customer satisfaction survey (ESAT) and analysis of key drivers of customer satisfaction, both co-commissioned with Ofgem.³
- April 2025 Supplier Workshops: We held further workshops on the
 potential metrics we were considering with attendees representing 99% of
 the domestic energy market.
- **June 2025 Exploratory RFI:** We asked all domestic energy suppliers for information to help us refine our proposals..

We'd like to thank energy suppliers and stakeholders for engaging with this process and sharing their insights.

3. Changes to the star rating

3.1. We have decided to introduce new metrics into the star rating and amend some of the current metrics, as detailed below. The way these metrics will operate in practice is set out in detail in the accompanying methodology.

³ Ofgem/Citizens Advice (2025) <u>Factors shaping overall satisfaction with energy suppliers, August 2023 to January 2025</u> and <u>Energy Consumer Satisfaction Survey: January 2025</u>

Table 1: Summary of key decisions

Category	Changes made	Explanation	Relevant section
Overall Scores	Reducing weighting of ease of contact to account for new metrics	Weighting set according to star rating objectives	3.2
Complaints	Possible changes to complaints scoring thresholds, pending more information on future reforms to redress	Allows for more variation in scores, additional incentives for lower performing suppliers.	4
Ease of	Phone wait times retained	Remains a key contact route	5
contact	Email wait times retained	Remains a key contact route	5
	Social media metric removed	Metric was no longer relevant	5
	Inclusion of other channels metric	Aligning the star rating with changes in consumer contact	5
Billing and Metering	Billing metric added	Billing issues are a key complaints category and are a key driver of customer satisfaction	6.1
	Smart metering metric added	Strong consumer benefit in working smart meters, and a key driver of customer satisfaction	6.2
Customer Satisfaction	Customer satisfaction metric will not be included in the star rating	Methodological concerns and practical issues. Other metrics are key drivers of customer satisfaction,	7
Customer Guarantees	Vulnerability Commitment and Energy Switch Guarantee retained	Ongoing consumer benefit from voluntary commitments	8

Table 2: New star rating methodology (first use planned for October - December 2025 data, March 2026 publication)

Category	Weighting	Metric	Weighting within Category	Weighting within overall score	Data source
Ease of contact	30%	Average call waiting time	60%	18%	RFI
		Email response time	20%	6%	RFI
		Other channels (including webchat, WhatsApp, SMS, in-app messaging) ⁴	20%	6%	RFI
Billing and	25%	Billing ⁵	60%	15%	RFI
Metering		Smart metering	40%	10%	RFI
Complaints	35%	Complaints to third parties		35%	Ombudsman: Energy (OS:E), consumer service (CS), Extra Help Unit (EHU), Advice Direct Scotland (ADS)
Customer commitmen ts	10%	Membership of the Energy Switch Guarantee, Vulnerability Commitment		10%	Publicly available

-

⁴ Suppliers will be scored only on 'other channels' they are using, defined as: Total contact through that channel is equal to at least 2.5% of all contact the supplier has received, and when combined the total contact received through all 'other channels' that meet the first criteria is at least 5% of all contact the supplier has received. Suppliers not reaching this threshold will have 40% of their Ease of Contact score come from email.

⁵ The billing score will apply to suppliers with over 5,000 customers paying by a method other than prepayment for more than 6 months for smart meters and 12 months for traditional meters. Suppliers who do not meet this threshold will be scored on the smart meter metric only.

Table 3: Star rating Table for Small Suppliers (<25,000 customers) (first use planned for October - December 2025 data, March 2026 publication)

Category	Weighti ng	Metric	Weighting within Score	Weighting within total score	Data source
Ease of Contact	50%	Average call waiting time	60%	30%	RFI
		Email response time	20%	10%	RFI
	Other channels (including webchat, WhatsApp, SMS, in-app messaging) ²	20%	10%	RFI	
Billing and	40%	Billing ³	60%	24%	RFI
Metering		Smart metering	40%	16%	RFI
Customer commitme nts	10%	Membership of the Energy Switch Guarantee, Vulnerability Commitment		10%	Publicly available

3.2. Weightings

- 3.2.1. The weightings for each category are designed to reflect the needs of consumers in general, and take account of outcomes for vulnerable consumers in particular. The addition of billing and smart metering metrics reflect customer research commissioned by Citizens Advice and key driver analysis of ESAT which demonstrated the importance of accurate billing and smart meter connectivity for service satisfaction.
- 3.2.2. In order to accommodate the billing and metering metrics, we have decided to decrease the Ease of Contact category from 55% of the overall score to 35%. Our research shows that ease of contact remains an important element of supplier performance, but the current high weighting was introduced in the 2023 methodology to reflect consumer concerns around being able to reliably contact their supplier for support during the energy crisis. Since 2023, we have seen significant improvements in performance, and as a result we believe that it is appropriate to reduce this focus on contact ease.

3.2.3. We have decided not to downweight complaints. While there has been improved performance on complaints since 2023, third party complaints levels remain higher than pre-energy crisis averages. While complaints occur less often compared to 'business as usual' metrics such as billing, our research demonstrates the significant impact of complaints handling has on individual consumer experience and outcomes. Our analysis shows that complaints performance demonstrates the quality of the wider service offered by firms, including elements of service not measured by our other metrics. This also aligns with the legal obligations Citizens Advice has to publish complaints data, and provides information not included in the broader ecosystem of supplier service ratings that is available to consumers.

4. Complaints

- **4.1.** In the consultation, we asked:
 - Should we change the thresholds for the top and bottom levels of complaints? If so, at what level should the revised thresholds be set?
 - Do you agree with the approach of incorporating half stars for complaints scores into the star rating?
 - Should we make changes to the weightings for complaints made to specific third parties?
 - Should we consider adding further Ombudsman data into the star rating?
 - Is there anything else you would like to tell us about our approach to complaints?
- **4.2.** Our initial view on the current complaints approach was set out in the consultation document. Supplier responses demonstrated clear differences in perspective, while input from other stakeholders added further context that informed our decisions. We have decided that:
 - We <u>will not</u> change the top or bottom thresholds for complaints
 - We will not alter the weightings for some specific types of complaints
 - We will not add additional Ombudsman data into the star rating
 - We <u>will</u> introduce half-stars for the complaints scores, pending further information on possible changes to access to redress in the energy sector.

4.3. Complaints score upper/lower thresholds

4.3.1. While some suppliers supported changing these thresholds for complaints, we have decided not to make any changes. Complaints performance has been improving across the energy market, as demonstrated by both <u>Ofgem</u> and <u>Citizens Advice</u> data (see chart below.) Several suppliers and other stakeholders provided feedback that they felt the complaints thresholds should not be changed, as they currently provide a fair goal and serve as a clear motivation for improvement in serving customers, and that changing thresholds would send an unclear message to consumers who rely on the star rating.

Complaints per 10,000 customer accounts **British Gas** So Energy E (Gas and Electricity) 200 Scottish Power 150 Average Ovo Energy **EDF Energy** 100 E.ON Next Utility Warehouse Octopus Energy Co-Operative Energy Tru Energy Outfox the Market **Good Energy Ecotricity** Ouarter 100Green

Chart 1: Complaints per 10,000 customer accounts, Q1 2019 to Q1 2025

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.



- 4.3.2. We think it is appropriate to encourage further improvements in complaints performance. The principle that no supplier should be de-incentivised to continue improving their performance has informed similar decision making on the ease of contact metric. Bringing the top threshold down (the most commonly requested change within the consultation) reduces that room for improvement for high performing suppliers.
- 4.3.3. We have not identified structural changes following the energy crisis, which would mean suppliers could not reach the highest scores in the complaints metric. For example, several suppliers have previously been able to score 4 or 5

stars on the complaints metric and we feel this is possible again without any adjustment to the thresholds.

4.4. Inclusion of half-stars

- 4.4.1. Our preferred position is to incorporate half-stars into the complaints metric. However these changes will remain pending until we have more information regarding possible changes to the complaints framework.
- 4.4.2. This approach would permit further distinction between energy suppliers, who might otherwise have had a limited incentive to improve their complaints performance, once they had hit a particular threshold. It will also allow for better distinction between suppliers who currently score within a fairly narrow range.
- 4.4.3. We believe introducing half stars addresses many of the issues raised by suppliers concerning complaints thresholds, and is supported by a wide range of stakeholders. We are hopeful we will be able to implement this change in line with other changes set out in this document. However, we are aware that proposed changes to redress are being developed by the Government, and the Energy Ombudsman is due to shortly begin a trial of alternative referral communications, known as Access for All (AFA). We will consider these developments before making a final decision on changes to our complaints scoring.

4.5. Weightings of types of third party complaints

- 4.5.1. Different types of complaints are weighted differently in our complaints measure, to give an overall 'ratio' per 10,000 customers. Complaints to the Extra Help Unit (EHU) and Energy Ombudsman are weighted most heavily, to reflect that these are more serious, and have progressed further on the complaints pathway without resolution.
- 4.5.2. A small minority of suppliers argued that various exclusions should be applied to complaints which went to third parties, particularly the EHU. Some suppliers also shared a view that complaints should only be included where consumers have been in touch with their supplier in the first instance. However, there are important elements of the complaints process which mean this issue can occur in limited circumstances.

- 4.5.3. Firstly, when a consumer makes contact with the Citizens Advice Consumer Service or Advice Direct Scotland (the relevant first-tier advice services for energy consumers in England and Wales or Scotland respectively), their circumstances and case details are assessed, including whether they have made contact with their energy supplier about the relevant issue.
- 4.5.4. This information factors into the case outcome for the consumer in question consumers who have already made contact with their supplier about an issue are more likely to be mid-call transferred to their energy supplier, who will be best-placed to resolve it. Cases meeting a higher threshold are mid-call transferred to their energy supplier (weighted at 25 in the complaints ratio). In instances where consumers are classed as vulnerable, with a complex case or at risk of disconnection, they are transferred to the EHU.
- 4.5.5. Based on analysis of Citizens Advice Consumer Service data, the majority (72.6%) of consumers who contacted Citizens Advice between January 2022 and March 2025 said that they had previously been in touch with their supplier. Of the remaining 27.4%, they were referred as follows:

Table 4: No Contact Cases, January 2022 to March 2025, by referral route

Referral Type	% of no contact cases	% of total cases
Advice Only or Other Agency ⁶	46%	13%
Supplier Referral	27%	7%
Extra Help Unit	27%	7%

4.5.6. Some suppliers feel that it is unfair to count these contacts as complaints, as they have not had a chance to resolve them. However, the impact of these cases is significantly reduced by the weightings. For example, in Q4 2024, while cases where the consumer said they initially did not contact the supplier, this made up 33% of total cases- only 15% of the market-wide complaints score was attributable to these cases. This is primarily because a large number of no contact cases are classified as Advice Only, and weighted relatively lightly.

11

⁶ Unless a case is referred to the supplier, EHU or Ombudsman, a referral to another agency is counted as an Advice Only case for the purposes of the star rating. Other agencies that we might refer to include Local Citizens Advice, Shelter or the Fuel Bank Foundation.

- 4.5.7. Different suppliers are affected differently, because EHU cases are unevenly distributed among suppliers. However, the structure of first and second tier advice aims to ensure that the problems facing vulnerable customers are prioritised and resolved as quickly as possible.
- 4.5.8. The vast majority of cases where a consumer said they had not contacted their supplier before they are referred to the EHU involve self-disconnection (84.5% on average for Q4 2024). Some suppliers argue they are not responsible for affordability challenges, and that they haven't had the opportunity to support these customers prior to the case going to the EHU. However, suppliers have specific legal obligations to proactively identify and support customers at risk of self-disconnection.
- 4.5.9. A suggestion made by some suppliers was to calculate EHU complaints as a percentage of PPM customers, rather than as a percentage of total customers, in recognition of the fact that PPM customers are more likely to use the EHU service. We considered this proposal, but have decided not to take it forward.
- 4.5.10. Suppliers are responsible for supporting consumers regardless of payment method or meter type, and have particular requirements to identify and support customers who are self-disconnecting. The complaints metric puts the responsibility on suppliers to meet the needs of all of their customers.
- 4.5.11. While a majority of the EHU's case load is PPM related, there is a significant portion (34% in the year to July 2025) that is not. To implement such a limit we would need to introduce a minimum threshold of PPM customers, to avoid unrepresentative results for suppliers who have few/no PPM customers. This could lead to an unfair advantage in the overall complaints score, since their EHU cases would no longer be counted.
- 4.5.12. Suppliers frequently inform us that they have undertaken significant work to improve the way that they communicate with their customers, to inform better working relationships with the EHU, and to proactively contact customers who are at risk of making a complaint or self-disconnecting. These efforts have been reflected in companies' improved complaints performance.
- 4.5.13. Our research has emphasised the importance of preventing and resolving customer issues, before they contact a third party organisation. Our key driver analysis of ESAT (see section 2.1 and 7.6) found that consumers who were satisfied with the handling of a complaint had an average overall satisfaction score of 87%, compared to 81% among those who never made a complaint. By contrast, for consumers who were dissatisfied with complaint handling, average overall satisfaction fell to just 49%.

4.6. Inclusion of additional Ombudsman data

4.6.1. A number of suppliers had positive views on including signposting rates in the rating. However, while signposting is important we don't think it could be easily incorporated into the rating, and recent policy developments and potential operational changes by the Ombudsman (see section 4.8.1 onward) mean we have decided not to make any changes at this stage.

4.7. Weighting of the complaints score

- 4.7.1. We have decided to keep complaints weighted at 35% of a supplier's total score.
- 4.7.2. Individuals who have complaints, even if they make up a small percentage of customers, are also more heavily affected and inconvenienced. This is true both in terms of the impact to them and their time, having to chase up complaints, but also their overall satisfaction.
- 4.7.3. As outlined in the ESAT Key Driver analysis, while complaints' impact on overall satisfaction was limited by low incidence, the individual impact of complaints on satisfaction is large. If all consumers in the survey had correctly addressed complaints, satisfaction would increase by 12%, from 75% to 87%. On the other hand, if all consumers had unsatisfactorily solved complaints, satisfaction would fall to 49%, a gap of 38%. This was the largest gap in implied satisfaction score of any variable, underlining the importance of complaints handling, despite the relatively low incidence of complaints.
- 4.7.4. Our analysis also shows that there is a strong, statistically significant correlation between overall satisfaction in ESAT, and complaints score, when controlling for supplier variance.
- 4.7.5. Our consumer research found that less than 60% of complaints made within the last 6 months had been resolved. When just looking at complaints that have reached a conclusion, more than 1 in 4 consumers were left with unresolved issues or had escalated them further. We think this demonstrates the need to maintain a focus on complaints handling in the rating.

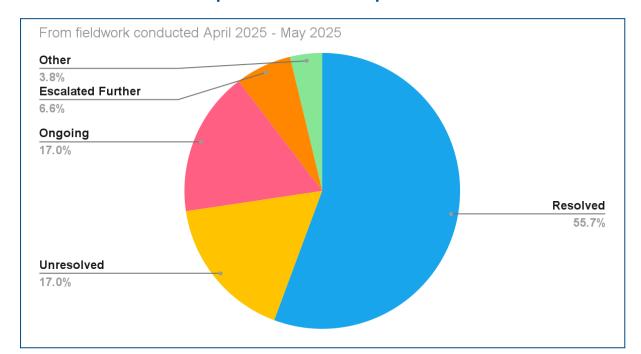


Chart 2: Outcome of complaints made in the previous 6 months

4.7.6. Retaining complaints as our highest weighting metric aligns with our advice role and statutory responsibilities to report on complaints. It is also particularly beneficial for consumers because this information is not available elsewhere.

4.8. Access for All - Proposed Approach

- 4.8.1. We are aware that participation in the upcoming Energy Ombudsman's Access for All pilot could have an impact on complaints scores for participating suppliers. We are also aware of government proposals to reduce Ombudsman waiting times and to enable auto-referral, which will have a broader impact on complaint volumes across the sector.
- 4.8.2. We recognise that the Access for All trial may increase EO cases for participating suppliers and potentially impact their star rating. We are keen to ensure that participation in the pilot does not penalise suppliers and that the star rating continues to provide consumers with accurate information on complaints.
- 4.8.3. On August 19th 2025, Citizens Advice wrote to suppliers regarding the proposed pilot, setting out proposals for how we might treat supplier complaints data during this period.
- 4.8.4. We will share further details of our approach as this is finalised.

5. Ease of contact

- **5.1.** In the consultation, we asked:
 - Are there any changes you would propose to the telephone waiting times metric of the star rating? Please give reasons if so.
 - Should we remove the social media metric entirely? Alternatively, should we explore including other social media channels such as WhatsApp into the social media metric?
 - Should we include webchat and/or in-app messaging in the ease of contact score? What weighting would you recommend applying to these? Are suppliers collecting sufficient data to allow comparability across the market?
 - 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?

5.2. We have decided that:

- We <u>will</u> reweight the Ease of Contact category in order to include new categories
- We will not make changes to the telephone waiting times metric
- We will remove the standalone social media metric
- We <u>will</u> include an 'other channels' metric for channels like webchat,
 Whatsapp, customer account/portal correspondence and in-app messaging
- **5.3.** As set out in section [6], in order to include the Billing and Metering category we have reduced the weighting of the Ease of Contact category.
- **5.4.** We will not alter the telephone waiting times metric. Responses to the consultation on this question generally agreed with this decision, and made valuable points such as:
 - The current measure of average speed of answer is easy for suppliers to measure and validate;
 - The metric aligns with Ofgem reporting;
 - It reflects the importance of timely phone responses especially for urgent contacts like prepayment issues;

- The 60% weighting aligns with the proportion of customer contact by phone and cautioned that reducing it could undermine recent service improvements.
- **5.5.** Our analysis demonstrates the ongoing importance of high quality telephone services. For the Q1 2025 star rating, 64% of all customer contact reported by suppliers was via telephone, generally aligning with our 60% weighting within the wider Customer Service metric.⁷

Table 5: Number of Contacts by Contact Method, Q1 2025

Contact Channel	Number of contacts across all star rating suppliers in Q1 2025	Percentage of all contact that came from that channel in Q1 2025
Telephone	11,755,525	64%
Email	4,106,460	22%
Other	2,418,043	13%
Total	18,280,028	N/A

5.6. Our research with consumers⁸ shows that 34% of all consumers prefer the telephone as a contact channel, rising to 48% of consumers who are disconnected or in debt. This is higher than any other contact channel. 50% of respondents believed telephone was the "most important contact method for suppliers to prioritise with respect to speed or level of service." We found that vulnerable customers, like those who were over state pension age or had long-term health issues, were more likely still to prefer contacting their supplier via telephone.

⁷ This is a long term trend, with customer contact via telephone stable at around 60-65% of all contacts for a number of years.

⁸ Citizens Advice (2025) Consumer research addressing energy service priorities and trust in metrics of performance

Table 6: Contact Method Preference by Consumers for General Contact and Disconnection/Debt

Contact Channel	Preference (General Contact)	Preference (Disconnection/Debt)
Telephone	34%	48%
Email	18%	12%
Live-Chat	15%	11%
Mobile-App	11%	7%
Customer Account/Portal	8%	6%
Whatsapp	5%	4%
Social Media	2%	2%

From Citizens Advice consumer research by Opinium which asked 3,000 consumers about contact method preferences

- **5.7.** Given this, we will continue to weight telephone wait times higher than other contact methods, especially given the higher utility to consumers facing significant challenges, and for these cohorts it is more important that they get a response as fast as possible.
- **5.8.** The reduction in overall weight for the Ease of Contact category means that telephone waiting times will become less influential in a supplier's overall score.
- **5.9.** Based on some consultation responses, we understand there is concern about the perceived difficulty of reaching the highest score threshold. **Whilst it is** uncommon to score a 5 on this metric, it has been achieved in recent quarters, and provides further room for improvement for suppliers who are close to the threshold, which benefits consumers.
- **5.10.** Some suppliers did raise other issues, including that:
 - Speed alone doesn't necessarily reflect service quality
 - There should be clearer definitions of which phone lines are included:
 - There should be consideration of IVR time in wait time calculations;
 - We should count response times for all emails in an email thread
 - We should incorporate opening hours into scoring

- **5.11.** We agree that speed alone does not indicate service quality. Our consumer research⁹ found availability of reaching customer support the top priority for consumers looking to switch energy providers 14% of the time, and a top 3 consideration 36% of the time. The only higher priorities were speaking to a real person (see section 5.23) and by a small margin the speed of resolution, which is impacted by availability of customer support. Also high on consumer priorities were the speed of response (via message or email). We consider customer satisfaction scores in section 7.
- **5.12.** We believe that clearer definitions of which phone lines are included can be addressed as part of the broader engagement process around the new methodology.
- **5.13.** We considered whether to include IVR in the call wait times when this metric was initially introduced. Our position was that IVRs can add value for consumers, and would not want to dis-incentivise their use. We remain open to any further evidence but since this issue was only raised by one supplier, we will maintain our current approach unless further evidence is provided.
- **5.14.** We also considered measuring response times within a chain as part of the introduction of the email metric. While this was our preferred approach at the time, we opted for a metric that measures only the response to the first email only. This was after reviewing the evidence and consulting with stakeholders as there are technical challenges particularly associated with discounting subsequent/secondary messages that are sent by a customer in between supplier responses.
- **5.15.** We have decided to make some other changes to the Ease of Contact metrics due to changes in the use of communications channels. We will remove the social media metric. Only one supplier has had social media contacts scored since Q3 2023, and the majority of suppliers have never passed the threshold for social media to be scored.
- **5.16.** Consultation responses were almost universally in favour of removing the social media metric. As highlighted in the consultation, this is likely because the use of some social media channels has changed dramatically over the previous few years.

18

⁹ Citizens Advice (2025) Consumer research addressing energy service priorities and trust in metrics of performance

- **5.17.** The majority of consultation responses supported including a wider range of contact channels, and our research demonstrates that these channels are preferred by a significant minority of consumers.
- 5.18. We will replace social media with an 'other channels' metric which provides up to 20% of the Ease of Contact score. This will include channels like Webchat, Whatsapp (and similar messaging apps where relevant), Customer Account/Portal (any communication occurring between the customer and a representative through a supplier maintained platform, akin to email), and In-App Messaging (specifically for applications maintained by the supplier). Allowing suppliers to include more of their total customer contact in the star rating leads to a stronger and more representative ranking, as well as not limiting any future contact channel development for suppliers.
- **5.19.** Where these channels are asynchronous with gaps in time between responses, they will be measured in line with our current approach to email contact performance, i.e. in days. Where these channels are synchronous with a live conversation where an issue is expected to be resolved or escalated before the conversation ends, they will be measured in line with our current approach to telephone contact performance, i.e. in seconds/minutes. The methodology will clearly set out the scoring criteria for each method.
- **5.20.** To ensure data is robust, suppliers will be scored only on 'other channels' where:
 - Total contact through that channel is equal to at least 2.5% of all contact the supplier has received, <u>and</u>
 - The combined total contact received through all 'other channels' that meet the first criteria is at least 5% of all contact the supplier has received.

The 20% weighting for 'other channels' within Ease of Contact will be spread across the additional channels used equally. For example, if a supplier maintains both SMS and webchat (at above 2.5% of all contact received), both will be weighted at 10%. If a supplier maintains only one channel, it will receive the full 20% weighting. If a supplier maintains no additional channels, email will make up a greater proportion of their Ease of Contact score.

5.21. These thresholds should ensure the metric is meaningful to consumers while allowing suppliers offering a variety of channels to consumers outside phone and email to have these represented in the rating. It should avoid inclusion of

- channels for more niche uses (ex: reserved for one customer group, or used only for sharing documents or photos).
- **5.22.** Including a 5% combined threshold should ensure a reasonable number of consumers are using a supplier's alternative contact methods, and aligns with our previous threshold for social media. Given the 20% overall weighting of this metric, anything less than a combined usage of 5% for alternative channels would be disproportionate. The results from our exploratory RFI showed that suppliers using at least one of the other contact channels that meet the thresholds set make up nearly three quarters of the market.
- 5.23. Some suppliers raised concerns around the use of automation in these channels. We are aware that suppliers are making use of chatbots and other automated systems to answer consumer queries. However, automated responses will be excluded from this metric. Since the metric measures speed of response, the inclusion of automated responses, which can be instantaneous, would significantly skew the results. Our consumer research found that being able to speak with a real person was the top priority for consumers when considering customer service, and feel this decision is reflective of that.
- **5.24.** There are currently no established indicators as to the quality of automated systems in answering consumer queries, especially complex ones. Our view is that, if suppliers make good use of automated systems that are able to satisfactorily resolve consumer issues, they will see an indirect benefit in the star rating through decreased waiting times and complaints. This aligns with our previous approach to email responses.
- **5.25.** We will continue to monitor the deployment of these systems and develop our thinking around if and how they can be effectively measured.

6. New metrics

6.1. Billing

- 6.1.1. In the consultation we asked:
 - Do you support the reintroduction of a billing metric? If so, what should it measure to drive improvements for consumers?

6.1.2. We have decided that:

- We <u>will</u> reintroduce a billing metric, with a weighting of 15% of a supplier's total score.
- This will be based on the percentage of consumers that have been provided with accurate Relevant Billing Information (parts a and b) within the past 12 months for traditional meters, and 6 months for smart meters.
- The billing score will apply to suppliers with over 5,000 customers paying by a method other than prepayment for more than 6 months for smart meters and 12 months for traditional meters. Suppliers who do not meet this threshold will be scored for the Billing and Metering category on the smart meter metric only.
- 6.1.3. As we outlined in our consultation, billing continues to be the single most common type of issue our consumer service advisors help people with.
- 6.1.4. Its importance is also demonstrated by our consumer research¹⁰ with Opinium, in which 44% of consumers identified billing accuracy and transparency as one of their top priorities when choosing a supplier, behind only price and tariff options. When asked what factors consumers considered most important when thinking about bills they received from their suppliers, 46% mentioned first time accuracy. Billing was also identified as a key factor in customer satisfaction in the ESAT key drivers report, with bill satisfaction rated as the second best predictor of overall satisfaction, behind only ease of contact.
- 6.1.5. Suppliers were generally supportive of the proposal to reintroduce the billing metric, with many pointing out the importance of billing to consumers and that a billing metric would help to shift the star rating to a more holistic model of supplier performance.
- 6.1.6. Based on our analysis and stakeholder feedback, we agree that billing should be reintroduced into the star rating as a key measure of supplier performance.
- 6.1.7. As raised in the initial consultation, under the previous billing accuracy metric (the proportion of customers getting one accurate bill per year) there was high performance by suppliers across the board, which did not provide meaningful

¹⁰ Citizens Advice (2025) Consumer research addressing energy service priorities and trust in metrics of performance

- differentiation for consumers. To overcome this, we originally proposed that the billing metric move to a 3 or 6 month time scale for all meter types.
- 6.1.8. Based on consultation feedback and other evidence we're not convinced it is currently feasible to apply a timescale shorter than 12 months for traditional meters. This may not align with quarterly billing cycles chosen by some consumers, and could increase supplier prompts for meter reads or smart meter exchanges in ways that have unintended negative consequences. A 12 month timescale also aligns with the regulatory requirements set out under SLC21B.4.
- 6.1.9. However, we believe that suppliers should be able to provide accurate bills to people with smart meters much more often, and that there is benefit in using a 6 month timescale. This should provide suppliers with sufficient time to resolve smart meter issues when they arise (in line with the timelines proposed for Ofgem's Guaranteed Standards¹¹), and communicate with affected customers about the need to temporarily provide manual readings.
- 6.1.10. This approach reflects consumer interests in accurate billing while also providing greater differentiation on the billing metric. We will keep this measure under review pending the outcome of Ofgem's ongoing billing work.
- 6.1.11. Some suppliers raised concerns regarding the reintroduction of the billing metric, they argued that billing performance is already captured within the complaints metric. We do not agree, as the complaints metric reflects a supplier's ability to resolve customer issues and does not directly assess the accuracy of bills issued to consumers.
- 6.1.12. We also disagree with proposals for the metric to account for 'dormant' consumers in suppliers' portfolios and for the star rating to shift to include a metric based on timeliness of a bill. Our consumer research¹² shows that billing accuracy is an important outcome, while the billing timeliness metric included in older versions of the star rating was removed due to changes in Ofgem's rules on customer communications. These changes removed the requirement for

¹¹ Ofgem (2025), <u>Statutory consultation on smart meter guaranteed standards of performance</u>

¹² Citizens Advice (2025) Consumer research addressing energy service priorities and trust in metrics of performance

regularly scheduled communications for prepayment customers, and meant that fewer credit meter customers would receive regularly scheduled bills.

6.2. Smart metering

6.2.1. In the consultation we asked:

• Do you support including smart meter metrics into the star rating? Please suggest any specific metrics which you would like to see considered.

6.2.2. We have decided that:

- We will include smart metering as a new metric within the star rating.
- The new metric will be scored on the proportion of smart meters that, at the end of the relevant reporting quarter, are not operating in smart mode (i.e. had not sent a meter reading within the prior 90 days).
- This metric is based on the existing definition/threshold provided by the Department of Energy Security & Net Zero (DESNZ), for a meter not working in 'smart mode'. This means traditional mode refers to "a smart meter where the respective energy supplier cannot obtain remote meter readings as expected, therefore the meter needs to be read manually or where the consumer cannot access their relevant energy information across the HAN including updated tariff information on a relevant consumer device." 13
- 6.2.3. Smart meters are a key enabler of a range of consumer benefits, from more accurate billing to better management of consumption. The key driver analysis identified satisfaction with smart meters as the third best predictor of overall satisfaction, and showed that a bad smart meter experience is worse for overall customer satisfaction than not having one in the first place.
- 6.2.4. Where suppliers supported the inclusion of a smart meter metric, they said:
 - It would highlight suppliers who actively engaged with their customers and fixed technical issues.
 - Smart meters allow for functionality like instantaneous financial support and automatic readings, which improve the consumer experience.

¹³ Department for Energy Security & Net Zero (2025) <u>Smart Metering Policy Framework - Post</u> <u>2025</u>

- It covers a section of consumer expectations that the star rating currently doesn't capture, particularly related to the hands-off aspect of remotely collected readings.
- 6.2.5. Where suppliers did not support the inclusion of the smart meter metric, responses focused on:
 - Geographical limitations (where certain parts of the country have higher or lower numbers of working smart meters)
 - Ongoing policy changes that might lead to further methodology review, and complicated interactions within the change of supplier (like inheriting a non-functioning smart meter)
 - The Data Communications Company (DCC)'s role in connectivity, as some communication issues can be the result of problems with the DCC network which are not the responsibility of the supplier.
- 6.2.6. Some suppliers raised concerns about whether using existing definitions set by Ofgem/DESNZ would lead to duplication, while other suppliers expressed a preference for alignment across the sector.
- 6.2.7. Current supplier-level reporting on smart meter functionality is not easily accessible, which limits transparency and incentives to improve. This would be addressed by the inclusion of the metric as set out above.
- 6.2.8. The definition provided by DESNZ in their smart metering framework is supported by both the existing Operational Licence Conditions and proposals where suppliers would be required to "take all reasonable steps to ensure any smart meters operating in traditional mode are operating in smart mode as soon as possible and no later than 90 days from the date they first become aware of an issue." ¹⁴
- 6.2.9. Ofgem has also proposed alterations to the Guaranteed Standards of Performance (GSoP), whereby consumers with meters remaining in traditional mode after 90 days would receive compensation. We agree with their assessment that a 90-day timeframe is an achievable target and will lead to customer service improvements, and as such that this is a suitable benchmark

 $^{^{14}}$ Department for Energy Security & Net Zero (2025) <u>Smart Metering Policy Framework - Post 2025</u>

¹⁵ Ofgem (2025) Statutory consultation on smart meter guaranteed standards of performance

for the star rating. We've not seen compelling evidence that factors outside of supplier control in relation to the operation of smart meters impacts some firms more or less than others.

- 6.2.10. Based on the exploratory RFI conducted, suppliers had between 0.2% and 30% of their smart meters not operating in 'smart mode' in Q4 of 2024. This suggests that there is a large variance on which to judge supplier performance, and that consumers should be made aware of how well their supplier is operating smart meters if they are considering switching. As set out in our consultation, considerable variance has also been seen in supplier-level data published by Ofgem.
- 6.2.11. A number of suppliers suggested that smart meters should be excluded from the billing metric to avoid double counting, but we don't agree for a number of reasons:
 - Forthcoming research from Citizens Advice highlights that smart meters
 provide a range of other benefits for consumers beyond billing: when
 asked which feature they considered most important to getting the most
 benefit from their smart meter, 26% said tracking their energy usage, 22%
 said improved billing accuracy and 17% said not having to give readings.
 - Our research suggests there are cases where meters are operating but consumers are still being asked for meter readings. These cases would be excluded if smart meters were split out from the billing metric.
 - The billing measure incentivises suppliers to put in place appropriate
 mitigations where smart meters are no longer operating in smart mode,
 such as proactively notifying customers they need to provide meter
 readings while they are waiting for these to be fixed.

7. Customer satisfaction

7.1. In the consultation we asked:

 Would you advocate including customer satisfaction metrics in 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? 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.

7.2. We have decided that:

- We <u>will not</u> include a customer satisfaction metric in the star rating.
- **7.3.** Suppliers were divided on the inclusion of customer satisfaction as a potential metric, with a minority (5 of 15) supportive of its inclusion. We recognise that customer satisfaction metrics provide important insights into supplier performance, and there are a range of surveys that are available for consumers to access. However, we think the clarity and focus on measurable outcomes for consumers is a significant strength of the star rating among the wider ecosystem of ratings.
- **7.4.** As set out in the consultation, we also think there are significant practical difficulties involved in including a measure of customer satisfaction in the star rating, including frequency of surveys, sample size (especially for smaller suppliers), and cost. These issues would likely reduce the timeliness and market coverage of the star rating, making it less useful to consumers.
- **7.5.** We also considered additional information in order to better inform our decision on whether to include customer satisfaction measures in the star rating. This included:
 - The key driver analysis of the Energy Consumer Satisfaction Survey (ESAT) conducted by BMG.¹⁶
 - Commissioned consumer research from Opinium¹⁷, which looked at how consumers make decisions about metrics that are covered in star rating, such as complaints, and what information they find helpful when doing so.
- **7.6.** Key findings from the key driver analysis of ESAT are summarised below:

¹⁶ Ofgem/Citizens Advice (2025) <u>Factors shaping overall satisfaction with energy suppliers, August</u> 2023 to January 2025

¹⁷ Citizens Advice (2025) Consumer research addressing energy service priorities and trust in metrics of performance

- **Direct measures of customer experience are good predictors of overall satisfaction:** Metrics focused on specific customer practices
 proved more effective in explaining variance in satisfaction score than
 demographic and energy characteristics. Specifically, ease of contacting a
 supplier, bill satisfaction and satisfaction with smart meters are the best
 predictors of overall customer satisfaction.
- Affordability concerns have an impact on customer satisfaction:
 BMG's Financial Vulnerability Classification captures a consumer's ability to save, manage unexpected costs, and avoid borrowing. It was the single most impactful variable among demographics and energy characteristics variables.
- Parent Supplier is a predictor of customer satisfaction beyond specific customer experiences: Parent Supplier retained its explanatory power even when separated from specific customer practices. This may be due to customer service experiences that were not covered in the satisfaction metrics e.g. bundle offers or unmeasured touchpoints. It could also reflect brand affinity, where some consumers have loyalty or attachment to their supplier that persists beyond specific service factors.
- **7.7.** These findings support some of the concerns we have around the inclusion of customer satisfaction in the star rating, which is intended as a measure of customer service performance.
- **7.8. Firstly, customer satisfaction scores are inseparable from affordability issues**. The fact that financial circumstances retain predictive power independent of specific customer service experiences highlights the influence of broader financial circumstances on satisfaction metrics. While this does not fully explain differences between suppliers customer satisfaction scores, it is a part of this explanation.
- **7.9. Secondly, there is a significant gap in understanding of the drivers of customer satisfaction**, with the best performing model only explaining around 40% of the variance in customer satisfaction. This highlights the significant role that unknown factors play in driving customer satisfaction. It may be that these factors are not service related, and therefore irrelevant to the star rating. If this gap is explained by customer service practices it is unclear what these practices

are, or whether they are measurable and comparable between suppliers.

- **7.10.** A strength of the star rating is that it provides direct incentives to improve performance on aspects of customer service that are important to consumers. Customer satisfaction metrics do not provide equivalent incentives, because it is less clear how they relate to specific customer experiences.
- **7.11.** Our commissioned research asked consumers about how they interact with different comparison tools available online. While the majority of consumers preferred to use price comparison websites, we found that other services were used with a fairly similar frequency (16-19%) including Ofgem, Which? and the Citizens Advice star rating. This demonstrates that consumers still have various types of service information to make informed decisions about their supplier.
- **7.12.** Our research also found that the star rating was used more frequently by respondents with energy use difficulties, those with young children and non-white respondents. These groups also more frequently prioritised clarity of information when evaluating the level of service they are provided by their energy supplier.

8. Customer Guarantees

- 8.1. We have decided to retain the Energy Switch Guarantee (ESG) as the measure of switching in the star rating.
- **8.2.** The inclusion of the ESG as a measure of switching performance appeared to be working well, and separate statistics from ESG indicated that switching was, for the most part, operating well in the market.¹⁸ This has positive impacts for consumers who switch suppliers.
- **8.3.** While the majority of respondents to the consultation agreed with this position, some raised concern that, with the introduction of faster switching, the ESG no longer goes beyond the current license conditions and therefore no longer

¹⁸ Energy UK (2024) Energy Switch Guarantee Q2 2024 KPI Tracker

benefits consumers.

- **8.4.** Our research with Opinium found that 81% of consumers felt that the ESG was important, the highest of any commitments they were asked about. We also consider there are still benefits to the ESG. Members commit to specific standards and have to demonstrate they are meeting certain targets in order to remain part of the ESG. Failure to meet these targets over a quarter can lead to deductions on the star rating's customer commitments score. We also note that the ESG is open to all suppliers regardless of whether or not they are members of Energy UK, with transitional support available to mitigate costs for small suppliers wishing to join.
- **8.5.** Our consultation did not seek specific views on the scoring for the Vulnerability Commitment, and we are not making any changes to this aspect of the rating.

9. Presentational changes

- 9.1. We have decided to not make presentational changes to the star rating.
- **9.2.** Some suppliers and stakeholders argued that more distinctions between types of supplier would be clearer for users. The suggested distinctions included:
 - A dedicated star rating for prepayment-only suppliers.
 - Further distinction based on supplier size, through a medium supplier table or aligning with Ofgem's definitions of supplier size.
- **9.3.** However, respondents to the consultation generally agreed that the drawbacks of additional tables based on specific supplier characteristics outweighed the benefits. It was felt that this would be confusing for consumers and that any issues were resolved as part of a review of the metrics themselves.
- **9.4.** It is a priority for the star rating to provide a comprehensive view of customer service performance regardless of particular business models. Accommodating

¹⁹ Citizens Advice (2025) Consumer research addressing energy service priorities and trust in metrics of performance

additional tables based on business models or other features would make these objectives harder to achieve and reduce the usefulness of the star rating.

10. Thresholds for inclusion in the main star rating

- **10.1.** The current threshold of requiring 25,000 customers to be included in the main rating was originally introduced as a way to ensure that the complaints score remained robust, and to align with the operation of advice services relevant for our complaints measure. Suppliers smaller than this are scored under a separate methodology, and not included in the main table.
- **10.2.** Some concerns were raised that the 25,000 threshold may allow smaller suppliers to perform better in the star rating in a way that was not reflective of actual performance.
- **10.3.** Due to this concern, we conducted a correlation analysis investigating the relationship between supplier size and overall star rating performance. **The analysis found no significant relationship**.
- **10.4.** The analysis included individual quarters (from Q2 2024 to Q1 2025) and of the last four quarters of the star rating combined, and considered supplier size in actual customer numbers, and categorised(as Small, Medium, Large and Largest).
- **10.5.** Two quarters (Q3 & Q4 of 2024) showed non-significant, small to medium positive correlations that suggest in this quarter larger suppliers performed better on the star rating, while Q2 of 2024 showed a non-significant, small negative correlation that suggests in this quarter larger suppliers performed better on the star rating. Q1 2025 had an almost neutral correlation suggesting that supplier size had no bearing on performance.
- 10.6. Overall analysis by both Customer Size and Size Category demonstrated small positive correlations, suggesting that larger suppliers performed marginally better in the last year of star rating releases, but was again, not significant.
 Based on this evidence, we will continue to use the current 25,000

customer threshold.

10.7. Some suppliers raised a concern that strong performance in the Star Rating by small suppliers could drive consumers to them, leading to rapid customer growth without the operational scope to meet consumers' needs, which can result in poor outcomes. We work closely with suppliers to ensure they are aware of the timelines for star rating publication. We also think this risk should be mitigated by Ofgem's strengthened rules around operational readiness and milestone assessments.

11. Director-level Approval of RFIs

- **11.1.** We have decided not to require director level sign off for star rating star rating RFIs. In the consultation responses, the majority of suppliers felt that this requirement duplicated existing requirements or would result in delays to the data process. A number of suppliers said that they already require Director-level sign off for star rating RFIs as part of their existing internal processes.
- 11.2. We take the possibility of misreporting very seriously. Under Section 25 of the Consumers, Estate Agents and Redress Act 2007 (CEAR), Citizens Advice already has powers to refer a regulated provider to Ofgem for failure to comply with a Request for Information. However, we have received no evidence of deliberate misreporting in the RFI process for the star rating.
- **11.3.** With the introduction of the new methodology, we will be adding new processes for sharing the underlying data for the star rating with Ofgem. We believe this will help to ensure the data's integrity. We will review our data sharing processes and inform suppliers of any changes needed.

12. Next steps

12.1. Ahead of the new methodology taking effect, we will meet with suppliers, Ofgem, the Department for Energy Security and Net Zero, the Energy Ombudsman, Extra Help Unit, Consumer Scotland and Advice Direct Scotland to review changes and ensure stakeholders can raise any questions or concerns.

12.2. Our planned next steps include:

- Late August-Early September 2025- Workshops hosted by Citizens Advice for energy suppliers which will cover the decisions we've made and the data implications.
- **September-October 2025** Produce and circulate final updated methodology and any additional relevant resources.
- September-October 2025 Sessions with Ofgem, DESNZ and other key stakeholders to ensure they understand the intended effect of the revised methodology, and the potential consumer impacts.
- October 2025- Issue the standard RFI using the current methodology (for December release)
- **November 2025** Exploratory RFI for metrics in the new methodology. This will act as both a test run of the new metrics and methodology with actual data from the previous quarter (July to September 2025), where available.
- **January 2026** Issue RFI for the new methodology (October to December 2025 data, for March 2026 release).
- Late March 2026- Issue the first star rating using the new methodology.

We will keep stakeholders informed of any major changes to our plans.

12.3. Contact Information

Workshops held in late August and early September 2025 will include opportunities for suppliers to ask our team about the new methodology. In the meantime, if you have any questions or concerns, please contact energyretail@citizensadvice.org.uk.

Citizens Advice helps people find a way forward.

We provide free, confidential and independent advice to help people overcome their problems. We are a voice for our clients and consumers on the issues that matter to them.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.

citizensadvice.org.uk







Published August 2025.

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

Registered charity number 279057.