



Isobel Croot,  
Citizens Advice,  
200 Aldersgate Street,  
London,  
EC1A 4HD

9<sup>th</sup> September 2016

Dear Isobel,

### **Improving energy supplier performance information consultation**

Thank you for the opportunity to comment on the above consultation. Bristol Energy is a new entrant supplier with a mission to deliver social good to energy users in Bristol and beyond.

#### Executive Summary

Bristol Energy welcomes Citizens Advice's proposals to provide greater supplier performance data to assist customers in making decisions about which supplier they may wish to switch to on a wider basis than just price.

However, we are disappointed that you intend to exclude over 50% of eligible domestic suppliers from your dataset (Including Bristol Energy), and thus there is potential to mislead customers in to thinking the seventeen largest suppliers are their best options, or inadvertently create the impression that other suppliers are somehow not to be trusted because Citizens Advice as a consumer organisation chooses not to assess them.

Citizens Advice cannot argue that commercial switching sites should adhere to the whole of market obligation, if they themselves do not adhere to it in the information it provides consumers. It is not fair, open or transparent to new entrant suppliers or customers seeking to switch and it is very important that all customers are listed in a way that makes clear that non-rated suppliers are still worth considering.

Whilst we are supportive of the Citizens Advice complaints metric being included, we believe it must be considered in relation to the totality of complaints a supplier receives per 100,000 customers. Customer must be able to see the difference between a supplier who has few complaints, but handles them badly and a supplier who has high complaint levels, but handles them efficiently.

Finally, we are not supportive of including customer commitments as a metric. These commitments were established by larger suppliers for the benefit of larger suppliers as an attempt to improve trust in them. Generally, smaller suppliers, need to gain and keep customers through the service they provide and thus choose "actions over words". Given both billing and switching are metrics in their own right we do not believe the commitment adds value other than to favour larger suppliers.

We have answered your specific questions below, expanding where necessary.

#### **Bristol Energy & Technology Services (Supply) Limited**

1 Temple Quay, Temple Back East, Bristol BS1 6DZ    [www.bristol-energy.co.uk](http://www.bristol-energy.co.uk)  
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**Q1. Do you agree that the combination of the 5 metrics proposed for the first release will provide customers with an overall view of suppliers' customer service performance? Please provide supporting evidence for your answer.**

We believe they are generally correct, but have two reservations.

Firstly, the complaints performance statistics currently published by Citizens Advice reflect how well a supplier is at handling complaints once received, but not how many complaints it receives. Whilst this is a good metric in its way we believe an additional metric should be included on number of complaints per 100,000 customers a supplier received (As reported by Ofgem) in addition to the Citizens Advice metric of how well suppliers handle complaints once received.

We also question the inclusion of customer commitments as both the commitments proposed were designed principally by the larger suppliers for the benefit of larger suppliers. i.e. To improve trust in them, whereas smaller suppliers in the main have no need for commitments to understand how to treat customers fairly. As Citizens Advice is proposing metrics in both the areas of switching and billing we see the inclusion of this metrics skewing the standard to larger suppliers and it should be removed.

**Q2. Do you agree that the indicative weightings are an accurate representation of the importance of each metric? If you suggest any changes, please provide an explanation and any supporting evidence.**

As stated above we believe the number of complaints per 100,000 as reported by Ofgem should be a metric, and believe this should have a 20% weighting. Citizens Advice's metric on complaint handling should be 10% with Customer Service and billing being 30% each with the removal of the customer commitment metric as a weighted influence on the score.

**Q3. Do you agree with the decision to limit the metrics and overall rating in the first release of the tool to the 17<sup>th</sup> largest suppliers from which we are able to collect representative data?**

We strongly disagree with this proposal. Citizens Advice has a statutory duty under the Consumers, Estate Agents and Redress Act 2000 to inform customers. To do this in a fair, honest and transparent manner it cannot realistically exclude listing over 50% of the domestic suppliers in the market. Nor can it argue for the retention of the "whole of Market" obligation on commercial switching sites, when as a body they do not subscribe to the same philosophy they argue for.

We recognise that collating meaningful data for all suppliers would be difficult, time consuming, and perhaps of little value for new suppliers with less than 12 months live data hence we would be comfortable if on relevant metrics, and total score some suppliers are listed as "insufficient data". Nevertheless, we believe Citizens Advice has a duty to as a minimum list all active suppliers in the market irrespective of size in a way that does not discourage customers from considering smaller suppliers, and make reasonable endeavours to provide metric data for all where possible and meaningful.

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- Q4. Do you agree that a future release of the tool would benefit from the inclusion of a performance metric about the average speed to answer telephone calls? Do you agree that the suggested scope of calls between '9am to 5pm, Monday to Sunday' is the appropriate timescale to capture this information? Please provide supporting evidence for your answer.**

We believe that speed of call answering is poor metric. Firstly, customers are increasingly using email to contact their energy supplier. In our case around 56% of customer contact in the last quarter came via email rather than the telephone. We recognise that customers facing long call waiting times can be a matter of dissatisfaction (and where expressed recorded as a complaint), but the quality of the call is equally important. A longer waiting time for a call to be answered is often acceptable if the customer's query or issue is then resolved on that 1<sup>st</sup> call rather than requiring several calls.

With regards to the appropriate timescales, we believe it should be judged on the suppliers stated opening hours as that will be when customers are calling. Suppliers who do not operate a 7 day service should not be underrated if that is the opening times listed. However, if a supplier offers 24/7 opening hours but poorly staffs its contact centre at certain times, this should be reflected.

- Q5. Do you agree that a future release of the tool would benefit from the inclusion of a performance metric about the accuracy of switching, based on the number of erroneous transfers? Please provide any supporting evidence for your answer.**

The inclusion of erroneous transfers as a metric assumes that ETs are always as a result of an error by the new supplier. In reality it can be for a number of reasons. Misinformation from the customer, bad address data on the registration database held by DNOs, or in many cases ETs are used to return customer who change their mind e.g. When reminded of exit fees by their old supplier. We also question whether erroneous transfers means anything to customers as a metric and is one more for industry comparison.

We would therefore be opposed to the metric as it could be misleading.

- Q6. Are there any additional qualitative indicators we should be considering for future development of the tool, in order to provide the best possible information for consumers?**

Other than to include complaints per 100,000 customers we have no further proposal. We do believe that there is a danger in having too many metrics thus confusing the customer.

- Q7. Do you agree that the scoring definitions and scoring criteria proposed are appropriate to use in a comparison tool? Please provide evidence with your response.**

Our only note on this is that by including the customer commitments it creates a bias in the scoring to larger suppliers better able to manage the bureaucracy that surrounds these commitments, even though being a signature to either code does not in itself improve the customer experience.

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**Q8. Do you agree that rounding supplier scores to the nearest quarter score will show sufficient granularity, whilst remaining clear enough for consumers to understand?**

With just seventeen suppliers this should be sufficient as it creates twenty possible scores, but as the numbers increase we believe it may be better to granulise to the nearest 1 decimal place creating fifty possible scores. This will be sufficiently simple for customers to understand whilst showing suppliers spread across a wider scoring system.

**Q9. Do you prefer the alternative scoring criteria over the initial scoring criteria set out in section 4.1? If so, why?**

No. We prefer the initial scoring criteria as it means a supplier is scored on how well they perform, irrespective as to how well their competitors perform. The alternative system means a supplier could improve their performance and still fall down the ranking, or a supplier performance could deteriorate and due to a greater deterioration by their competitors be seen to be improving their standing.

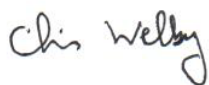
**Q10. Do you agree that the proposed tool will make improvements to the experience consumers currently have when accessing Citizens Advice performance information?**

We are fully supportive of any ways to improve access to customer information currently hidden away in the Citizens Advice website. Our concern would be how Citizens Advice will control the messaging for suppliers for whom they do not intend to provide a ranking. This must be part of any agreement with TPis for use of the data.

We would also encourage Citizen's Advice to consider setting up the data on a separate micro site to make it easier for customers to find and for 3<sup>rd</sup> parties to signpost.

I hope you find this response useful. Should you have any further questions, please do not hesitate to contact me.

Kind regards,



Chris Welby  
Head of Regulation

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