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Improving energy supplier performance information – Energy supplier comparison tool project

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

We strongly support the development and publication of the Energy Supplier Comparison Tool (ESCT) to enable informed switching decisions by customers. We encourage Citizens Advice to carry out customer research, along with further consultation with suppliers, to establish the information customers find most useful to inform switching decisions, and therefore which metrics should be included in any future development.

While the publication of the ESCT will offer benefits to customers and stakeholders, it is of paramount importance that the publication contains transparent, independent and robust data. Having the various metrics available in a usable format will help drive the industry to improve service performance in order to achieve best possible score, which in turn will support the development of trust in the sector.

We understand that the initial release will only contain information about the 17 largest suppliers; however we encourage the inclusion of all suppliers as soon as possible. This will ensure customers have the required information (beyond just price and complaints) for all potential switching options.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Lesley Bowen on 0191 512 5336, or myself.

I confirm that this letter and its attachment may be published on Citizens Advice website.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Paul Delamare".

Paul Delamare
Head of Customers Policy and Regulation

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Attachment

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EDF Energy's response to your questions

Section 2

Q1. Do you agree that the combination of the 5 metrics proposed for the first release will provide consumers with an overall view of suppliers' customer service performance? Please provide any supporting evidence for your answer.

EDF Energy fully supports the proposed five metrics and we agree that the initial categories Citizens Advice has identified are appropriate for the first release.

The majority of metrics proposed are already published, albeit across a variety of website locations. The proposed metrics will provide useful information for customers.

We encourage Citizens Advice to carry out consumer research in order to establish the information most useful to customers in helping them make an informed decision when choosing a supplier. This research should be undertaken and considered prior to any additional metrics being included.

It is crucial that the data is accurate and relevant in order for it to be useful and appropriate for customers. Therefore, we recommend the robustness of the data is fully tested with suppliers prior to any public release, particularly the data which is sourced from GfK surveys.

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.

We agree in principle with the use of weights for the metrics, however, we do not fully agree with the specific weightings proposed for the first release.

It is crucial that the metrics for Customer Service and Billing are robust. These metrics form 50% of the current suggested weightings, and therefore would have a substantial impact on the suppliers overall representation within the Energy Supplier Comparison Tool (ESCT).

The existing metrics are based on survey data and are therefore a measure of customer perception rather than objective data. Consideration should be given to the Customer Service metric being based on objective performance data, for example, response times for calls or emails rather than based on a survey of how easily customers felt it was to contact their supplier. However, if Citizens Advice intends to utilise the survey data, we would welcome further detail on the robustness, sample sizes and methodology of the surveys carried out by GfK, and for this to be shared with suppliers prior to publication.

In relation to the metric “Customer Commitments”, which includes Billing Code and Switch Guarantee, we believe that the 10% weighting proposed should be increased. We fully support this metric as these areas are independently audited and provide customers with a robust set of protections in important areas. We believe it is appropriate for the scoring to be linked to audit performance in order to properly reflect a supplier’s performance.

It is unclear why the Energy UK Safety Net membership, Prepayment Principles and Point of Acquisition model for Debt Assignment Protocol have not been included within these metrics.

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

We fully support the publication of the ESCT and would prefer this to be inclusive of the whole of market rather than the 17 largest suppliers. However, we recognise the complexities involved in gathering data from all suppliers in preparation for release later this year. Therefore, in order to be pragmatic, we support the first release to only include the 17 largest suppliers rather than adding any delays to the proposed release timescale.

It is important to ensure the interests of customers are met and consider providing information on all suppliers. Clear messaging is required alongside the ESCT explaining why some suppliers have not been included. It would be helpful for such messaging to be shared with all suppliers prior to publication.

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 5pm, Monday Sunday’ is the appropriate timescale to capture this information? Please provide any supporting evidence for your answer.

EDF Energy supports the inclusion of a performance metric around average speed to answer telephone calls. We do not agree with limiting the suggested scope of calls answered between 9am – 5pm as we are concerned that this would drive the wrong behaviours, with suppliers encouraged to focus their efforts on the time band being measured. We encourage robust guidance to ensure all suppliers measure this metric consistently.

With this in mind, we suggest any future metric should focus on accessibility of suppliers, rather than only speed of phone call answer. It is important that customers can easily and quickly contact their supplier by their chosen method, and this may not necessarily be by telephone, it may be via a live chat facility or email. We therefore recommend that any further release of the ESCT takes into account a range of contact methods rather than only speed of phone call answer.

We would also welcome and encourage customer research prior to any additional metrics being included. This would focus on ensuring that the ESCT contains the information which would most inform customers when making any switching decisions.

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.

We do not agree with including a performance metric which is based on the number of Erroneous Transfers (ETs). There are a number of issues that affect ETs, including factors outside a supplier's control. Customers also have 24 months in which to raise an ET; therefore, it is unclear how a metric would measure 'current' supplier performance. We also question whether all customers are aware of what an ET is, unless they have had personal experience of this process.

Information is currently provided to Ofgem as part of our monthly Retail Market Monitoring (RMM) return. Should this be a metric that is considered for future releases, this existing information could be used to gather performance data from suppliers.

We would also welcome and encourage customer research prior to the inclusion of any additional metrics, ensuring the ESCT contains information which customers are specifically focused on when viewing any comparison data.

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?

EDF Energy agrees that the proposed future metrics are worth considering within the development of the ESCT. We encourage customer research prior to any additional metrics being included along with consultation taking place with all suppliers.

We would also recommend including a metric encompassing support for vulnerable customers. Potential options for consideration would include: does the supplier have a Trust Fund or the number of customers on Priority Services Register.

Section 4

Q7. Do you agree that the scoring definitions and scoring criteria proposed are appropriate to use for the comparison tool? Please provide any supporting evidence with your response.

We largely agree with the scoring definitions and criteria proposed, however, we question the switching metric for "excellent performance". While we support the need for stretching scoring metrics, it is not appropriate that all switches must be within 21 days or less, to gain a score of five.

As there are a number of industry complexities which affect the switching process, we recommend amending the excellent performance criteria to 98% and above.

Information on switching timescales is currently provided to Ofgem as part of our quarterly RMM reporting. We believe that this metric should be sourced from this data as

this supports transparency in providing a consistent view for consumers across the industry.

We fully support the Customer Commitment metric. However, we recommend consideration being given to the scoring being reflective of any audit results. This would also provide alignment with the proposals for the metrics included within the first release.

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

We support the recommendation that the scores should be rounded to the nearest quarter score, and agree this will provide sufficient granularity for customers.

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

EDF Energy prefers the initial scoring criteria set out within the consultation. We consider the initial scoring criteria provide sufficient comparable detail to support consumers in making an informed decision.

In addition, we are concerned that one poor score in the alternative scoring could have a significant impact on a suppliers final standing in the league table, even where each supplier has scored within a few percentage points of each other.

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

EDF Energy is fully supportive of the proposals for the ESCT giving consumers a central view of initially five metrics to support an informed decision in selecting a supplier.

While we share the vision of Citizens Advice, it is important to ensure the interests of consumers are met without creating any detriment to the reputation of suppliers or the industry.

Consumers should be informed and reassured by the publication of the ESCT providing an independent and balanced view across the metrics published.

Furthermore, we agree that publishing data which is informative and of interest to consumers is important in encouraging consumer engagement. However, it is critical that the data is accurate and transparent and we therefore recommend the robustness of the data is fully tested with suppliers prior to any public release.

We would encourage this information to be available to alternative switching sites to support customers making informed choices in switching decisions.

EDF Energy
September 2016