

Question 1

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.

While we broadly agree with the combination of five metrics proposed for the first release, we believe that Citizens Advice should undertake some consumer research in order to ensure the metrics accurately reflect what is important to consumers. In particular, more evidence is needed around GFK data. We would like more assurance around the robustness of the GFK (the questions that were asked and the results): we appreciate the document sent to Gillian Geeson on 6 September 2016 but have not yet had time to review this thoroughly.

We agree strongly with Citizens Advice statement in Section 2 of the consultation that the comparison tool should not unnecessarily duplicate or conflict with existing information sources and are keen to understand what actions Citizens Advice is taking to ensure this is the case.

We do not see the benefit in including a 'customer commitment' metric that contributes to the performance metric calculated by Citizens Advice. We do recognise the opportunity that the tool gives to promote the billing code and switch guarantee and suggest that it may be more appropriate to display whether a supplier is signed up rather than include it in the weightings, thus avoiding duplication of switching and billing metrics.

With regards to the complaints metric, there are a number of factors that can influence the measures that constitute the complaints handling league table, e.g. disparities in the quality of signposting between suppliers. To give a fuller representation of supplier complaints handling, we ask Citizens Advice to consider incorporating Ofgem's research on customer satisfaction with supplier complaints handling. This would ensure issues such as the 'resolution gap', identified by Ofgem as important to the customer experience, are given prominence in the metric. It would also be useful to include a metric for the ratio of complaints referred to the Ombudsman relative to customer numbers.

We understand that the metrics provided by GFK are split by gas and electricity. This may cause confusion where there are discrepancies between the performance of the same metric for different fuels. We would be interested in how Citizens Advice plans to use the performance of each fuel for overall supplier performance.

Citizens Advice might consider displaying participation in Safety Net and the Debt Assignment Protocol through the tool. By being a signatory to the Safety Net and undergoing annual audits, suppliers are demonstrating (through the classification they achieve) that they are protecting vulnerable customers from disconnection.

Question 2

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 recognise the changes Citizens Advice have made in reducing the proposed weighting of complaints down from 40% to 30%.

However, we would like to see this reduced further: we do not believe that weighting complaints at 30% is an accurate representation of importance. As we pointed out in our response to Question 1, how clearly a supplier signposts to Citizens Advice may affect the number of complaints received by them. Additional factors around complaints, such as those suggested in our response to Question 1, should be included in the metric if it is to be a true reflection of suppliers' complaints performance.

With regards to billing, we believe it should be weighted as a minimum at 30%. This is a core process for all energy suppliers and extremely important for consumer satisfaction.

Question 3

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?

Without including all suppliers, the tool will not be able to provide a true comparison on supplier performance. Citizens Advice should justify the reason for only including the largest 17 suppliers in the first release: our preference is for the tool to include all suppliers, even if that delays release.

There is also a risk that consumers will perceive the omission of smaller suppliers suspiciously and so be less likely to switch to such suppliers.

Citizens Advice should consider an initial dummy run of the tool to test the data before it is published, with a working group to review the outcome and make recommendations: this would be a more robust approach to implementation.

Question 4

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.

We do not believe it would be practicable to include such a performance metric, due to issues such as the extent to which Interactive Voice Recording (IVR) is used (IVR can be a quick way of answering common questions asked by customers without them having to talk to an advisor) and differences in opening hours for call centres. There is also the question as to whether all call centres should be included; some calls relate specifically to energy supply, whereas others relate to non-electricity/gas supply related issues, such as district heating or the Energy Company Obligation.

The 'average speed to answer' would not record instances where calls are not answered at all, e.g. if telephone lines are non-operational.

Communication channels are changing and suppliers are increasingly using other tools such as webchat. Some suppliers may also have tools to help them identify consumer contact preferences: for example, those customers who prefer to talk to us in the evening or at weekends rather than during standard office hours.

Should the decision be made to include the measure in the future, we would expect there to be adequate controls in place to ensure that each and every supplier calculates their performance in the same way so as to ensure that the information is valid for customers. One possible consideration is to measure what proportion of calls are answered within a given time limit (e.g. five minutes); this would represent the difficulty customers have in speaking to their supplier, although this may need to reflect seasonality.

Question 5

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 that the tool may benefit from including a performance metric based on the number of erroneous transfers. Erroneous transfers may be the fault of either the losing supplier or the gaining supplier. In addition, erroneous transfers are a very small proportion of transfers, so giving weight to the issue would be disproportionate. We do not believe this data has any value for consumers.

The faster switching programme should reduce the impact of erroneous transfers.

Question 6

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?

Citizens Advice could consider indicators on the accuracy and timeliness of billing. Consideration should also be given to the feasibility of including a direct measure of customer overall satisfaction, based on customer surveys undertaken by suppliers. For example, some suppliers use the Net Promoter Score (NPS) system to measure whether customers are likely to recommend them. With all measures considered, research should be undertaken to identify what is important to consumers.

Question 7

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 agree that the scoring definitions and scoring criteria proposed are appropriate.

Question 8

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 agree that rounding to the nearest quarter shows sufficient granularity.

Question 9

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

No, our preference is for the initial scoring criteria. The alternative could make the scoring more volatile, particularly where there are a number of suppliers with similar performances. True performance is better reflected by the 1-5 scale.

Question 10

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

We see the proposed tool as a positive development, but strongly recommend that, before any tool is published, Citizens Advice undertakes consumer research to confirm to establish the value of these changes. In particular, it would be useful to understand the materiality of the number of hits on the league table, customer service tool and price comparison tool on Citizens Advice's website.



We note recognition by Citizens Advice that the current consumer information landscape in relation to complaints and other issues can be confusing for consumers, and welcome collaboration between Citizens Advice, Ofgem and the Ombudsman. It is important that the comparison tool is properly co-ordinated with other organisations that publish complaints data.

With respect to timing of the release of the tool, Citizens Advice should consider carefully what impact the changes resulting from the Competition and Markets Authority (CMA) report will have. The industry landscape is likely to change significantly in terms of tariffs offered and changes to Ofgem's RMR Clearer Information rules. This could result in report findings being erratic, and comparison to historic reports will be less relevant.