



This paper sets out the Energy Action Scotland (EAS) response to the Citizens Advice (CA) consultation on improving energy supplier performance information.

## **Introduction**

Energy Action Scotland (EAS) is the Scottish charity with the remit of ending fuel poverty. EAS has been working with this remit since its inception in 1983 and has campaigned on the issue of fuel poverty and delivered many practical and research projects to tackle the problems of cold, damp homes. EAS works with both the Scottish and the UK Governments on energy efficiency programme design and implementation.

EAS welcomes the opportunity to respond to this consultation.

## **Fuel Poverty in Scotland**

The Scottish Government is required by the Housing (Scotland) Act 2001 to end fuel poverty, as far as is practicable, by 2016 and plans to do this are set out in the Scottish Fuel Poverty Statement. The number of Scottish households living in fuel poverty dropped from 756,000 (35.6%) in 1996 to 293,000 (13.4%) in 2002. Half the reduction was due to increases in household income, 35% to reduced fuel prices and 15% to improved energy efficiency of housing<sup>1</sup>. The most recent figures<sup>2</sup> from the Scottish House Condition Survey Key Findings Report show that there were 845,000 households living in fuel poverty in Scotland in 2014, representing 35% of total households.

Given its remit, EAS's response to this consultation focuses primarily on those areas that it considers most likely to impact on fuel poor and vulnerable consumers.

## **Response**

EAS is delighted that CA has chosen to undertake this consultation at a time when the energy supply market is still not widely seen in a positive light by many consumers. Better comparison information should enable consumers to make more informed choices and should increase engagement in the market.

The response to each of the questions is noted below:

*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?*

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<sup>1</sup> Fuel Poverty in Scotland: Further Analysis of the Scottish Housing Condition survey 2002

<sup>2</sup> Scottish House Condition Scotland Key Findings Report 2014

It would seem that the five proposed metrics of complaints, customer service, billing, switching and customer commitments capture all the important matters for consumers and EAS agrees that their combination will provide a good overview of performance to those wishing to engage in the market.

*2 Do you agree that the indicative weightings are an accurate representation of the importance of each metric?*

EAS is in agreement with the suggested weightings.

*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.*

This would seem the best option at this time, however as the remaining suppliers gain more customers CA should keep this under review and include these other suppliers when appropriate.

*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?*

While the average length of time to answer a call is indeed an important measure, so too is having that enquiry/complaint dealt with at the first call and in a timely manner. Some consideration should be given to recording the failure to resolve issues on the first call. The timescales suggested seem appropriate and while EAS would be supportive of this time frame for the capture of information it is also worth considering an extended timeframe in some instances. Many engaged consumers will use alternative periods for telephone conversations around a range of energy related topics, many covered in the metrics already outlined in this consultation. It would be advantageous to have ongoing snapshots for these time frames covering the 5pm to 8pm period.

*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?*

EAS is again supportive of this.

*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?*

EAS has no additional suggestions for additional metrics at this time.

*7 Do you agree that the scoring definitions and scoring criteria proposed are appropriate to use for the comparison tool?*

EAS would agree that the definitions and criteria propose by CA are the most appropriate measures for use by the proposed comparison tool.

*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?*

Rounding is the easiest way to give easily understandable and compatible scores. The level suggested in the consultation document is low enough to show the granularity needed in making accurate comparisons.

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

No. EASs preference is for the first suggested scoring criteria.

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

EAS agrees that the proposed changes will indeed make a significant improvement for consumers who wish to be active participants in the energy market, assisting them in making more informed choice on energy supplier's performance. It is less clear that it will further encourage those who do not already engage in the market to do so more proactively. However, it is important to continue to find better ways to support engaged consumers, making their journey easier to navigate and EAS wishes CA success in this improved tool.