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via Email to:isobel.croot@citizensadvice.org.uk

Dear Isobel,

Following the workshops held and further discussions on the Energy Comparison Tool (ECT) we have pleasure in responding to the consultation on this matter.

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.

We agree that the 5 metrics proposed will give consumers an overall view of suppliers' performance in the key areas of the life cycle of being a customer. As the comparison tool will only show suppliers who have in excess of 150,000 customers in terms of metric's 2 – 5, will this not distort the view of the whole of market, potentially promoting the larger suppliers only? Our concern being a supplier of less than 150,000 customers means that consumers would only have visibility of our complaints performance, which they currently do today. Therefore we don't feel that a true comparison can be gained through this tool, unless the customer specifically wants to compare the larger suppliers.

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.

Given that the ECT is to be used for consumers looking to switch supplier we feel that the weighting which has been assigned to the switching metric should be increased, given the purpose and intent of this tool. We appreciate that complaints will always be a focus area for consumers to base part of their decision on choosing an energy provider, however there are still inconsistencies between suppliers logging Expression of Dissatisfaction (EoD's) contacts. Until there is consistency across the industry, one supplier cannot be fairly compared to the next given EOD's are self-captured and can be subjective. Our thoughts on the weightings are therefore below together with our rationale.

Metric	Weighting	Maximum	Rationale
Complaints	25% (30%)	1.25 (1.5)	The two pinch points to a customer are complaint handling & billing, therefore the weighting has been amended to an equal of billing
Customer Service	20% (25%)	1 (1.25)	With most suppliers having multiple channels for contact and more innovative ways to communicate with customers (e.g web chat, IVR interactions) customer satisfaction levels are increasing. We pride ourselves on the external recognition we receive for customer service so we feel the weighting can be lowered in favour of switching.
Billing	25%	1.25	Billing performance can be the driver of many issues for customers and should be a key factor when choosing a supplier. An accurate & timely bill has a large impact on customer satisfaction

Switching	20% (10%)	1 (0.5)	We were surprised that given the industry push for customers to switch and the launch of the switch guarantee that the weighting in this metric was one of the lowest
Customer Commitment	10%	0.5	This metric is dependent on the size of the supplier and unless explained to customers upfront could give a false impression. The majority of requirements within the Switch Guarantee & Code for Accurate Billing are also in the main regulatory requirements which all suppliers are required to be compliant against

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?

The timelines for launching the ETC in November 2016 seem aggressive, given your response to this consultation is at the end of September. Overall preference would be to launch when there is confidence amongst suppliers, all of the metrics and weightings have been confirmed and agreed, and a full comparison can be attained by including all suppliers, above 50,000 customers. Launching a comparison tool with half of the market not being represented doesn't seem logical if you're proposing to include the additional 27 smaller suppliers after the initial launch. It feels like we're trying to meet a timeline / milestone just to prove it's been met, but not giving the consumer all of the information, with suppliers having had chance to agree on all of the metrics and weighting.

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 agree that this is a metric that consumers would see as a useful indicator of the performance and service they would receive from their supplier. There is thought needed into how this metric would be reported to ensure there is a fair comparison, for example some of the larger suppliers have the ability to offer web chat as an alternative to speaking to the contact centre, offer IVR for bill payments or automated ring back facilities. Smaller suppliers, like us don't have that ability just yet with the majority of our calls taken by the contact centre. Volumetric based data to represent the proportion of calls taken and the speed of answer may give a more fair representation when comparing regardless of customer base, as a suggestion.

With regards to the 9am - 5pm suggestion, we would request clarity that this does not represent opening hours.

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 feel that basing the accuracy of switching on erroneous transfers wouldn't necessarily give an appropriate reflection on the supplier. In some instances erroneous transfers are the cause of customers providing incorrect information or omitting information when there are related meters at a property or the meter type cannot be supported, unknown to the supplier at the time of sign up. Energy UK recently undertook some data analysis on the performance of suppliers handling erroneous transfers and the results were alarming, some supplies have still not be returned in over 18 months due to technical reasons and other barriers between suppliers. Presenting erroneous transfer data to a customer will possibly confuse them and wouldn't give an accurate reflection on the

supplier being measured due to the complexities of that industry process.

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?

We feel that additional metrics on suppliers could be around what their bills are funding in addition to the obvious energy/ policy costs, so for example does the supplier support community initiatives, what do they invest in – do they reinvest within the UK? Consumers are looking for something to differentiate their choice amongst suppliers, with the UK soon being independent following Brexit, European funding for renewable infrastructure and other investments will be withdrawn. We feel consumers knowing where their ‘pound’ is being spent and reinvested may change their relationship in a positive way with a new supplier.

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 with the scoring definitions and criteria in principle, although they are quite difficult to immediately understand, rewording into more plain and intelligible language may help. When smaller suppliers are included into the ECT as mentioned, a review of the Customer Commitments metric would be welcomed as to how this would be fairly represented. Whilst Good Energy use the principles and guidance of the Code for Accurate Billing and have a good performance against switching we have not yet signed up to either code. We have recently agreed to the 10 Pre Payment Self Disconnection principles and will review our position on the Switch Guarantee in early 2017. In essence, whilst we are not formally signed up to the two voluntary codes mentioned we have adopted the principles as a responsible and caring energy supplier.

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 this would be the easiest representation of the result for consumers to use.

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

The alternative scoring criteria is not our preference over the one proposed in section 4.1. Using a league table approach would rank suppliers, not giving the consumer the chance or need to look at the individual make-up of the overall result. One metric may be much more important to one consumer over another and a league table could lead them to making a decision without looking at the measures in their true value.

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

We do, on the whole support the launch of a ‘one stop shop’ comparison tool which will bring together fragmented information, or data that is currently not published to allow consumers to make an informed choice. With the removal of certain RMR elements following the CMA remedies this will become a valuable tool for consumers to have a fair representation of the market to use when deciding their supplier of choice. However, this must be a fair representation of the whole of market in line with the Citizen’s Advice price comparison website, given price will always be a huge driver for a consumer’s choice of supplier, but shouldn’t be the only driver; the ETC therefore ensures this lens can be offered.

I trust that the responses provided will help you consider how to shape the ECT project and ultimately the deliverable. Should you require any further information, please do contact me.

We look forward to your response to this consultation in due course.

Kind Regards,



Peter Berry
Senior Compliance Manager
Good Energy