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Improving energy supplier performance information: Energy supplier comparison tool project

Dear Isobel,

Please find below npower's response to the Citizens Advice Energy Supplier Comparison Tool project consultation.

Response Summary

npower are supportive of making it easier for consumers to access supplier performance information to enable them to compare energy suppliers and inform their switching decisions. We believe this will promote trust in the energy industry.

One of our main concerns is that we believe it is important to ensure that the metrics and data used within the Energy supplier comparison tool are meaningful to consumers and must be based on consumer insight to encourage engagement, rather than just the provision of available data.

We believe that the timescales for the first release appear optimistic. This is due to our belief that consumer insight is required and we would expect that Citizens Advice allow suppliers to have a review period of the Energy supplier comparison tool prior to a public release.

Finally, we believe that the schedule of updating supplier information within the Energy supplier comparison tool should be aligned to the current approach to regulatory reporting and updates to the tool need to be made in a regular and timely manner.

Response to consultation questions

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?

We agree with the general intention of the 5 metrics, however we believe it is important to support the decision on the data to be included with consumer insight, to ensure we are not providing unnecessary data. The data must be displayed in a clear and simple way, only including metrics

that are meaningful to customers.

Q2 Do you agree that the indicative weightings are an accurate representation of the importance of each metric?

We believe that the indicative weightings should be adjusted to better reflect the overall number of energy consumers impacted and recognise consumer motives for accessing this comparison information. We would therefore recommend an increase in the weighting of 'switching' and a reduction to the 'complaints' weighting.

Proposed weightings:

Complaints	20%
Customer Service	25%
Billing	25%
Switching	20%
Customer Commitment	10%

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?

No, we believe that the first release of the tool should include all suppliers to ensure consumers are able to make like for like comparisons between all potential energy suppliers.

However if the metrics and overall rating in the first release is limited to the largest 17 suppliers then we would like assurances that there is a plan for the inclusion of all remaining suppliers in a timely second release.

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?

Again, consumer insight is required to ascertain if this is a metric that customers would find valuable. There needs to be a consistent approach to measuring average speed to answer telephone calls, i.e. a standardised approach of recording when a call has been 'answered'. If a new common metric is to be used, suppliers' agreement will be required.

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?

No, we do not agree that this is an appropriate measure for accuracy of switching as this is an issue that suppliers cannot always necessarily impact. We also believe that including this metric would cause unnecessary confusion to customers. Erroneous Transfers only impact a very small number of customers, so including this metric would be disproportionate.

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?

As you have recognised, the 'new energy consumer' will be a priority for you over the next year. We believe that there may be value in considering suppliers' ability to offer digital tools, such as mobile apps and online account management and the performance in this area. However we would recommend carrying out consumer research to understand which indicators customers would find useful.

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.

Yes.

As we move towards principles based regulations we believe that 'Customer commitment' will be an important element to the comparison tool and we therefore recommend that other voluntary commitments should be included, for example EUK Safety Net, Debt Assignment Protocol, Closed Account Credit Balance minimum standards, Prepayment Principles.

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?

Yes, we agree with rounding supplier scores to the nearest quarter.

Q9 Do you prefer the alternative scoring criteria over the initial scoring criteria set out in Section 4.1?

No, our preference is the initial criteria as we believe that this provides a clear comparison for consumers based on performance.

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

The proposed comparison tool will benefit consumers by consolidating information into one place however further consumer insight is required to understand if the proposed tool presents information that is clear and meaningful. It will be important for the tool to be easily accessible to benefit consumers.

We hope that you find our consultation response useful.

If you wish to discuss this matter further or provide any updates on the project, please contact either James Locker (james.locker@npower.com) or Laura Parkes (laura.parkes@npower.com).

Yours sincerely,

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