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**Citizens Advice consultation on updated Star Rating Customer Service Metrics**  
**E Reference: Reg's 036**

For the attention of Thomas Brooke Bullard,

Dear Tom,

E (Gas and Electricity) Ltd (E) welcome the opportunity to provide feedback with regards to the Citizen's Advice (CAB) Energy Supplier Rating consultation on the new customer service metrics and updates, dated September 2019.

E has participated in the discussions with Energy UK regarding the proposal and whilst we are in agreement with the majority of views within Energy UK, E do have a different view with regards to the following questions.

For ease of reference, we have followed the same format as Energy UK's response and picked out the 7-key minded to proposals from Citizens Advice. See Energy UK's response paper for where we have stated we are in agreement with them.

**Responses to minded to proposals:**

1. To update the customer service metric in the rating to include email response time and social media response time (to direct private messages from a customer). Email response time will be mandatory, while social media will not be a mandatory metric as not all suppliers offer it.

E Agree with Energy UK response.

2. Not to include telephone ring backs and dropped calls as new metrics in the rating.

E Agree with Energy UK response.

3. Not to include web chat as a metric, but to return to this at a later stage.

E Agree with Energy UK response. But would like to add that E do not believe that suppliers should be penalised for not offering this service in future. If it were to be introduced at a later date then we would recommend it reflects the social media weighting methodology currently being proposed. I.e. if web chat is



not offered by suppliers then the full score should be weighted toward other communication methods, such as email.

4. To remove the bill timeliness element of the rating

E Agree with Energy UK response

5. To include the Energy UK Vulnerability Code of Practice in the rating.

E share a different view to Energy UK relating to this question. Whilst in principle we agree in future it would be sensible to include within the CAB rating, it is too early at this stage in proposing the introduction of the Energy UK Vulnerability Charter (VC) as (to our knowledge) the first draft of the VC was only issued week commencing 30 September 2019 to EUK members. Until market wide stakeholder engagement has taken place to finalise the VC wording, it would be impossible for CAB to assess compliance against this as part of its star rating.

E also have concerns with regards to Ofgem's use of the CAB star rating as a means of enforcement action. In September 2019, Ofgem issued a formal request for information to all suppliers who scored a 3\* or below in the CAB Customer Contact rating (call answering time of above 90 seconds). The RFI suggests that suppliers are non-compliant with SLC0.3 and requires immediate and mid-term improvement plans. E are concerned that Ofgem's strong wording within the RFI and the use of the CAB Average Call Centre Wait Times as a means to enforce process improvements on suppliers, is moving away from the Principle Based Regulations adopted by Ofgem and a move towards prescription that suppliers must be achieving a call waiting time of 89 seconds or less in order to be compliant with SLC 0.3. Whilst we do recognise that there is a need for some suppliers to make improvements in their overall customer service experience, recognising that signing up the VC is above any current licence requirements, we are concerned at the potential enforcement implications of not being a signatory member to the VC or non-compliance / to the VC at a later stage.

At this stage we have presumed that 100% compliance to both the EUK VC is required in order to receive the CAB star rating. We would like to point out that there may be elements of the VC that a supplier is unable to commit to or is working towards and therefore only partially compliant. We would therefore like to request further clarity from Citizens Advice and Energy UK regarding compliance requirements prior to the inclusion of the VC into the CAB supplier tool.

We would strongly suggest that the inclusion of the VC as part of this proposal into the star rating should be postponed to give sufficient time for the VC to be reviewed by all effected stakeholders. At which stage we would welcome Citizens Advice conducting a further consultation proposing the inclusion of the final version along with confirmation from Citizens Advice on the proposed star weighting.

6. To change the reporting period for Energy Ombudsman data in the rating from acceptance date to completion date.

E Agree with Energy UK response

7. To align our switching metric with Ofgem's proposed approach for the switching Guaranteed Standards, if these are confirmed.

E Agree with Energy UK response

Please contact me in the first instance should you require any further information.



Yours sincerely

Richard Masterson  
**Regulation & Compliance Manager**



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