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Dear Thomas

Energy Supplier Rating: Consultation on new customer service metrics and other updates

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, storage and energy supply to end users. We have around five million electricity and gas customer accounts in the UK, including residential and business users.

We support the ongoing review of the Energy Supplier Rating to ensure it remains a useful and relevant tool for customers to enable them to make an informed choice when selecting a supplier.

EDF Energy welcomes the inclusion of additional customer service methods in the rating, as this should reflect the contact methods which customers choose to use, and therefore should be expanded to include these. To ensure the rating continues to be relevant to customers, Citizens Advice should expand the rating further to include webchat as a customer service metric as this is our second most popular contact method after telephone.

It is important to customers that they can easily and quickly contact their supplier by a method which suits their characteristics and preferences. Citizens Advice should consider implementing a metric that scores suppliers based on the range of contact channels offered, similar to the customer guarantees metric. This would provide customers with a valuable comparison allowing them to make informed switching decisions.

It remains crucial that the data displayed in the rating is accurate, consistent and comparable across all suppliers, in order for it to be useful and appropriate for customers. Therefore Citizens Advice should ensure clarification is provided to suppliers in relation to the exclusions for email and social media messages.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Claire Clark, or myself.

I confirm that this letter and its attachment may be published on Citizens Advice website.

Yours sincerely

A handwritten signature in black ink, appearing to be "J. Mason", enclosed in a thin black rectangular border.

John Mason
Senior Manager of Customers Policy and Regulation

Attachment

Energy Supplier Rating: Consultation on new customer service metrics and other updates

EDF Energy's response to your questions

Q1. Do you agree with our proposal to include email as a customer service metric?

EDF Energy supports the proposal to include email as a customer service metric in the Energy Supplier Rating. While this is a positive move towards acknowledging the alternative methods being used by customers to contact their supplier, it is worth noting that email is becoming less popular amongst customers as a preferred contact channel, with webchat, social media, SMS and WhatsApp becoming increasingly popular.

Q2. Do you agree with our proposal to use percentage response time (within a certain number of days) as our measure of supplier performance?

We agree that supplier performance should be measured on the percentage response time, within a certain number of days. It is imperative that the data used in the rating is consistent across all suppliers and that it is easily comparable. Based on the findings detailed in the consultation document, following the exploratory RFI, measuring suppliers on percentage response time rather than resolution time is the best option to ensure robustness and consistency in the data provided by suppliers.

Q3. Do you agree with our proposal to measure response time to subsequent emails from consumers, following supplier responses, and to exclude response time to secondary messages?

We agree that response time to subsequent emails, following responses from suppliers should be included in the measure.

However, we do not have a mechanism to exclude response times to secondary messages. It is unlikely that automated reporting would be able to exclude these messages meaning manual intervention would be required to remove these. Due to the volume of email messages we receive, this would be labour intensive. In addition to this difficulty in reporting, there is a risk that not all suppliers would apply consistent logic when excluding these messages and on this basis, requiring suppliers to exclude these messages could jeopardise the integrity of the metric.

Q4. Please share any relevant research you are aware of on customer expectations of email response time.

EDF Energy is not aware of any relevant research on customer expectations of email response time, however are supportive of Citizens Advice conducting any relevant research and sharing this with suppliers.

Q5. Do you have any further comments on our proposal to include email as a customer service metric?

Although, the inclusion of email makes the rating more relevant to customers who chose to contact their suppliers in this way, there is an increasing population of customers who are moving away from email as their preferred contact method. EDF Energy has recently seen a reduction in the percentage of contact received via this channel, therefore this metric is less relevant to customers as it would have been previously.

Citizens Advice should continue to explore the possibility of further expanding the metric to include contact channels such as webchat that are becoming increasingly popular with customers.

Q6. Do you agree with our proposal to include social media as a customer service metric?

Yes, we agree with the inclusion of social media as a customer service metric. EDF Energy has an increasing number of customers choosing to use social media as their chosen contact method. The inclusion of social media in the rating ensures customers, who choose this contact method, are provided with information that is relevant to them when making switching decisions.

Q7. Do you agree with our proposal to measure Facebook and Twitter contacts, and to only measure direct messages?

Facebook and Twitter are the most common forms of social media used by customers to contact their supplier therefore, we agree measuring performance for these platforms is appropriate.

We agree that direct messages are those deemed to require a response by suppliers and therefore the social media metric should monitor performance for these messages only and not those that appear publically.

Q8. Do you agree with our proposal not to make social media a mandatory contact channel, but to penalise suppliers who have a presence on social media but do not respond to customer queries via this channel?

Yes, we agree with the proposal that suppliers who have a presence on social media but do not respond to customer queries via this channel should be penalised by scoring zero.

EDF Energy has seen an increasing volume of customers choosing to use social media as their chosen method of contact, suggesting more and more customers find this level of customer service important to them. Therefore, suppliers who do offer this contact channel should be appropriately recognised in rating. A metric, similar to the customer guarantees metric, whereby suppliers are scored based on the different contact channels offered, would provide customers with a valuable comparison allowing them to make informed switching decisions.

Q9. Do you agree with our proposal to change the wording around ‘answered substantively’ in our information request?

The change to include the wording ‘answered substantively’ rather than ‘respond to’ provides some additional clarification to suppliers regarding the reporting requirements. In its consultation document, Citizens Advice states this excludes automated responses or messages which do not address the issue. We assume the intention of this is to exclude acknowledging and/or holding emails that are either automated or sent manually. However despite the wording change, there remains the potential that this could be misinterpreted by suppliers.

We urge Citizens Advice to provide a clear interpretation of what is meant by ‘answered substantively’ and the relevant inclusions and exclusions to ensure consistency across suppliers.

Q10. Please share any relevant research you are aware of on customer expectations of social media response time.

EDF Energy is not aware of any relevant research on customer expectations of social media response time, and is supportive of Citizens Advice conducting any relevant research and sharing this with suppliers. However, as interactions on social media often consist of concise two-way communication, we consider 24 hours to be a reasonable response time that would meet the expectations of customers.

Q11. Do you have any further comments on our proposal to include social media as a customer service metric in the rating?

Citizens Advice should continue to review the customer service metric to ensure it remains relevant for customers. As social media continues to grow as a preferred contact method, other platforms should be considered for inclusion, as and when appropriate, following consultation with suppliers.

Q12. Do you agree with our proposal not to include webchat as a customer service metric at this stage, but to keep it under review as part of future iterations of the rating?

We do not agree with the proposal to exclude webchat as a customer service metric. Webchat is a growing contact channel that is the preference for many customers. Currently webchat is our second largest channel, being more popular than contacts made via email, social media, EDF Energy app, letter and SMS combined.

Excluding webchat from the rating means a large proportion of customer contact performance, across the market, is not being measured. Should Citizens Advice continue with their proposals to exclude this from the Quarter 1 2020 iteration of the rating, we strongly urge it continues to look at the inclusion of this for the future, to ensure customers are provided with useful comparative data that helps them make an informed decision when selecting their chosen supplier.

Q13. Do you have any further comments on webchat as a customer service metric?

Given the concerns outlined in the consultation regarding offering webchat across the market, webchat should be included in the rating in a similar way to the proposal for social media. Where suppliers do offer this channel, their performance and average speed of answer should be included in the rating. Where they fail to provide this to Citizens Advice, suppliers should be scored zero in this metric.

Q14. Do you agree with our proposal not to include telephone ringbacks and telephone abandonment rates as customer service metrics?

Yes, we agree with the proposal not to include telephone ringback and abandonment rates as customer service metrics. As mentioned previously, customers are increasingly more likely to use a method other than telephone to contact their supplier; therefore performance in these areas has become less important to customers when selecting their chosen supplier.

Q15. Do you agree with our proposal for incorporating the new customer service metrics into the rating?

We largely agree with the proposals for incorporating the new customer service metrics into the rating. However, it is imperative that the weighting of the metrics for each category appropriately reflects the level of importance for customers.

We agree that telephone contact should continue to be a mandatory metric in the star rating due to the volume of contacts via this channel. The weighting of the average call waiting time metric in the customer service category should be reflective of this, however, it is important that the weighting of other contact channels appropriately acknowledges their growing popularity amongst customers. This will ensure that the overall rating provides an accurate representation of supplier customer service performance.

We do not agree with the proposal to remove the bill timeliness metric as we do not agree that bill timeliness is less relevant to customers. Although the requirement to provide annual statements has been removed from the supply licence, there still remains a requirement to make available a bill or statement of account, to customers with a credit meter, at least twice yearly. The timeliness of bills remains important for those customers who pay on receipt of bill and those who are keen to keep a track of their energy usage and manage their energy costs. It is evident from supplier complaint performance data that billing is consistently one of the most common causes of customer complaint. Billing as a category of complaint is broad and captures a multitude of different billing issues. Due to this, retaining the timeliness metric will enable the billing performance of suppliers to be more effectively measured for customers. Continuing to use a combination of both bill accuracy and bill timeliness will provide a comprehensive view of suppliers billing performance, assisting customers to make an informed decision based on what is important to them.

Q16. Do you agree with our proposal to include the Energy UK Vulnerability Code of Practice in the rating?

Yes we agree that the Energy UK Vulnerability Code of Practice should feature as a measure in the rating, as this will provide more suppliers with an incentive to sign up to the Code of Practice. Citizens Advice acknowledges in its consultation that the content and governance structure for the Energy UK Code of Practice is still being defined. We agree that this should be considered when determining the weighting of this metric in the star rating and suggest Citizens Advice share their proposals with suppliers on this as the Energy UK Vulnerability Code of Practice develops further.

Q17. Do you have any comments on the broader role of the Company Commitments element of the star rating?

We fully support the inclusion of Company Commitments in the Energy Supplier Rating. It is appropriate that suppliers are recognised for their commitment in these areas in the rating. This also provides an incentive for suppliers to sign up to any new commitments.

Q18. Do you have any comments on the opportunity to dispute the reports from the Energy Ombudsman in the star rating processes?

We support the proposal to move from the use of cases accepted, to cases resolved excluding deadlocked complaints. We do not think that the removal of duplicate cases should be limited to cases accepted in the previous two quarters, as some cases can take longer to resolve.

Q19. Do you have any comments on the proposal to align the star rating measure of switching timeliness with Ofgem's proposals?

We agree in principle that the metrics in the star rating should align with other customer facing metrics where possible, as this ensures customers are provided with a useful and consistent view of supplier performance.

However, the second phase of the Guaranteed Standards consultation remains open with a decision expected in December. The new standards will not be implemented before March 2020. Therefore until the final position of these is known, it would be sensible to delay aligning the switching metric until the detail of the Guaranteed Standards is clear.

**EDF Energy
October 2019**