

Citizens Advice Star Rating Customer Service Update Consultation Document – FESL Response

1) Do you agree with our proposal to include email as a customer service metric?

- a. *Whilst in principle, email is a good bellwether to provide the direction of travel of how well response times are managed as a Key Performance Indicator, it can be seen as a blunt instrument for qualitative metrics measuring the richness in customer satisfaction. Qualitative metrics could be described as:*
 - i. *Resolving the customers query at first point of engagement*
 - ii. *Quality of response*
 - iii. *Additional information/value add service regarding customers account (billing, cheaper tariffs, DD adequacy etc...)*
- b. *FESL already capture the number of emails and speed of first response, with a KPI of responses by next working day, however, the challenge remains on guaranteeing Quality of Service (content, richness and first point of contact resolution) across our 3 brands (OTM, FE and E7).*
- c. *Frequently customers do not want “canned” responses, but need a tailored response to their specific enquiry. In addition, often the first contact from the customer does not provide all the information required to resolve their enquiry. Based on these 2 factors, first time resolution is a complex KPI to track*
- d. *For a further qualitative measure, customers can be contacted following closure of their enquiry to gauge the level of service the customer achieved.*
- e. *To accurately measure the quality of service, based on resolution of the initial customer query, suppliers would need to invest in 3rd party tools to glean qualitative intelligence about how we are doing as a business*
- f. *FESL wants to put on record that, from day 1 of service as a supplier, we have provided email service to all of our customers across all 3 brands*

In summary, if quality is being tracked by number of emails and response times, including email as a customer service as a metric is a valid measure. However, beyond these 2 factors, using email resolution as a metric is not an easy metric to measure.

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

- a. *Yes – as explained in question 1, if demand and response time is tracked, this should provide a valid indicator of customer service. Providing the measure is like for like across all suppliers, e.g. response time within a given timeframe, this would be a fair assessment.*
- b. *A further approach could be to apply a grading system response times, i.e. a higher grading for quicker responses and/or resolutions*
- c. *First response need to be clarified as a human response, not an automated email acknowledging receipt of the customers enquiry*

3) 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?

- a. *The complexity in this approach is the science required to assess where a customers’ email qualifies as a response to the original request or a new point of enquiry, without using 3rd party tools. Even using 3rd party tools will not give you the metric you desire as it lends itself to being very subjective and the objective of the metric is self-defeating*

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- b. *Any measurement needs to assess predictability, consistency and reliability for that measurement to demonstrate confidence that like for like is being measured, without human influence over the outcome*
- c. *Whilst you make these assumptions in your proposal, around number of complaints etc..., there is no science that specifically link number of emails, response times, resolution times with number of complaints*
- d. *Depending on the nature of the customer query, email communication could be the result of initial contact being made by the customer using one of the alternative contact methods available, e.g. phones, webchat, social media, with email simply being used to close -of the enquiry*

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

- a. *FESL has been operational for 2.5 years and whilst we have not undertaken any formal research, our customer feedback across 3 brands and c. 90,000 customers points to customers expecting responses within 2 working days. However, there is a growing expectation of same day responses, driven by retailers outside of the industry, for example Amazon, where the customer is receiving near real time resolution to their enquiries. In some ways, this trend drives customers towards alternative contact methods, e.g. webchat and will eventually see the use of chatbots and Artificial Intelligence by suppliers to answer common queries*
- b. *The nature of the enquiry from the customer can also drive the expectations of the customer in terms of speed of response. For simple queries, the customer may expect a quicker response than a more complex enquiry. In addition, there may be circumstances where the customer does not require/expect to receive any response, e.g. meter read submission*
- c. *Finally, personality of the customers vary substantially and may drive the expectation in terms of response times. Customers can be highly demanding and expect fast responses, others may be happy to wait for a response*

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

- a. *FESL have explained the assumptions and the risks of the targeted proposal. What's clear is that some of these assumptions, especially to do with measurement, need to be tested and the risks understood and mitigated for the metrics to be meaningful*
- b. *The metric will need to go through a period of testing/trial to understand truly how effective the metrics are.*

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

- a. *It is important that energy suppliers are kept "on trend" with the variety of engagement methods that customers expect. In an evolving population, the use of Social Media as a contact method is becoming more commonplace across the retail market, irrelevant of the industry. For this reason, FESL believe that by not including a social media metric, the methods of contact available to be presented by suppliers is not comprehensive*
- b. *Having said the above, the same complexities and challenges faced by email contact will also be experienced with social media, whereby tracking against resolution of enquiries is onerous and inconsistent between suppliers*

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

- a. *FESL agree with the proposal to measure Facebook and Twitter, but to only measure genuine direct messages. The industry needs to be aware that Social Media is an echo-chamber which, by design, enables trolls to post unsubstantiated falsities with an objective of spreading "fake news" in regards*

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to suppliers. This can be in the format of posts on suppliers Facebook sites, creating their own discrete groups or even via direct messages. It is important to ensure that only valid customer contact is assessed.

- b. *Emails can be better regulated, by tools available from companies such as Experian to assure validity of the email or by content filtering the emails being sent or received. Social Media, as an unregulated ecosystem, does not facilitate the same controls that can be applied to other contact methods to assure quality of contact*
- c. *Experience over the past 12 months is that Social Media can be unreliable if used, in its entirety, as a metric for customer contact*

8) 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?

- a. *Proving 7 a, b & c are understood, FESL agree with the proposal to penalise suppliers that have Social Media but do not respond to customer queries*
- b. *Priorities/minimum standards should be for all suppliers to be contactable via email, telephony and webchat and it should not be seen negatively if a supplier does not have a social media presence or withdraws their Social Media sites – the storm can that can be caused by the unregulated nature of Social Media means that even where suppliers are active on Social Media they should be able to withdraw their sites to protect the business and consumers*

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

- a. *FESL agree with the definition of answered substantively to exclude automated responses, and to re-align customers to a more appropriate contact channel. This is underpinned by FESL’s response in 8b whereby email, telephony and webchat should be considered the minimum standards for customer service*

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

- a. *FESL re-iterates that Social Media is unregulated and consequently is an echo-chamber for extreme negativity and vitriol to be poured through these channels. In the event of a social media storm, suppliers should be entitled to pull out of Social Media and inform customers that responses will only be via email, webchat or telephony. Suppliers need to build in safeguards to better manage expectations during “black swan” events. This has been experienced first hand by FESL, during winter 2018, where a very tiny minority of consumers engaged in a vicious hate campaign through social media*

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

- a. *FESL believe that social media a valid communication tool that could be offered to customers and, where available, should be within scope of customer service metrics. Having said this, caution and common sense should be applied to assure that only valid customer contact is included within the metrics*

12) 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?

- a. *Webchat is seen by FESL as a core communication channel. FESL has first hand experience that suggests that this is the preferred method for a large proportion of customers, particularly as FESL response to customers typically within 10 seconds*

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- b. *It is our view that Webchat may not be seen as a primary communication channel where responses from other suppliers can take hours. FESL's experience points to something very different, in fact Webchat is as ubiquitous as email with our customers*
- c. *In a lot workplaces, Social Media sites are blocked, access to phones and personal email are limited and work email is not commonly used for personal reasons. Therefore Webchat is the easiest accessible contact methods for a lot of FESL customers and see substantially more contact than Social Media*
- d. *It is surprising that Social Media is taking a higher precedence than Webchat when FESL's experience is that Webchat far exceeds Social Media from a contact count perspective and typically a preferred method of contact for our customers requiring fast responses to their enquiries*
- e. *FESL believe that Webchat should be included a customer service metric, and suppliers should be assessed on the speed of response times in the same way as email as telephony. Communication channels should be driven by the consumer requirements, not the supplier offerings. Web Chat does not require any accounts to be created, which email and Social Media do, and can be accessed from almost anywhere*

13) Do you have any further comments on webchat as a customer service metric?

- a. *The reason Social Media has been agreed as a metric is because suppliers acknowledge the other opportunities that Social Media opens up in terms of marketing, promotions and improving brand awareness. Customer Service via Social Media is often a secondary consideration to the marketing opportunities Social Media bring. Web Chat is a dedicated communication channel offering customers real time, online access, to customer support. FESL are firmly of the belief that Webchat should be considered a primary contact method and should take precedence over Social Media*

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

- a. *Yes, FESL agree with the proposal not to include telephone ringbacks and abandonment rates as customer service metrics*
- b. *Ringbacks can be considered a value add service, not core to Customer Service. At point of ringback, the customer may have resolved their query using other channels, may be unavailable to take a call or may no longer require support*
- c. *Abandonment rates are hard to qualify as there is no way to measure why a call has been abandoned. There are a number of reasons why a call may be abandoned, and without further customer contact it is not possible to know these reasons*

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

- a. *Yes, FESL are in broad agreement to incorporating the new customer service metrics into the rating*
- b. *Smaller suppliers will be disadvantaged, or suppliers within controlled market entry, may struggle to participate in the benefits under Customer Commitments. During the initial phases of being a supplier, the focus should be on building a sustainable customer base and business and the bodies listed under Customer Commitments should be a secondary consideration, thus potentially penalising new entrants*
- c. *In addition to b. elements of the Customer Commitments may not be achieved due to size of customer base, looking particularly at PPM Principles, where a supplier is not obliged to offer pre-pay meters until 50,000 customers are on supply*

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

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- a. *If the measurement is fair, and is like for like, then FESL agree with this proposal. However, a balance needs to be struck to ensure new suppliers are not weighed down by a governance structure that impedes their ability to grow. In addition, larger, more established, suppliers can obtain an unfair advantage as a result of lesser resource constraints, more experience etc...*
- b. *A method needs to be implemented to ensure that small, medium and large suppliers are assessed fairly and taking into consideration their stature in the market*

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

- a. *FESL are committed to the broader, high-level, elements of the star rating, but as explained in 16, that smaller suppliers will always be plagued with competing demands and therefore will require to make priority calls while they move up the maturity curve, and therefore may be penalised by lack of focus on Company Commitments*

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

- a. *FESL agree with the proposal outlining the opportunity to dispute the reports from the Energy Ombudsman in the star rating process*

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

- a. *FESL agree with the proposal to align the star rating measure of switching timeliness with Ofgem's proposal. FESL already work to timeliness based on when the customer switching request is received.*