

To:
Thomas Brooke Bullard
Citizens Advice

21 October 2019

Dear Thomas,

Energy Supplier rating: consultation on new customer service metrics

Thank you for the opportunity to comment on this consultation. This letter provides an overall summary of our views on the proposed changes to the methodology on customer service metrics rather a response to the individual questions.

Overall, we continue to support the Citizens Advice rating as a measure of how energy suppliers serve their customers and a key way of holding companies to account on this. Ensuring that the rating is used and recognised more widely by consumers and industry is an important aspect of this, both now and going forward.

Email

Overall, we support the proposal that email response time should be reported and included in the metric as mandatory. It is interesting to see that suppliers were unable to provide good quality data to Citizens Advice for email responses given the importance of this channel to customers.

It may also be useful to prescribe the emails that would be included in this measure such as those transacted through 'in app' and 'web submission' where these channels are offered. We note the proposal to measure the response time to all emails from a customer in a thread rather than just the initial message. This may prove difficult to implement consistently across suppliers as opposed to just measuring the average response time to all emails from a customer that require an action from the supplier.

We do not have any specific further evidence to share in terms of thresholds, or take a definitive general view on this, but we see benchmarks measured in working days with an outlier 5 days as appropriate. While noting the intended methodology on how this element of will be translated to a rating, namely that it will based on the range and median supplier performance in your exploratory RFI, further clarity of how the threshold will be applied is important to ensure the integrity of the overall customer service metric is maintained.

Social Media

-We support the proposal that social media responses should be reported and included in the metric. We note that the channels covered will be Twitter and Facebook (direct private message). While this should capture a large proportion of traffic there may be other channels which need to be considered in further iterations of this metric. We also agree

that 'answer substantively' should include cases where customer has been moved to another channel. However, what 'substantive' answer is may be open to interpretation and potentially lead to inconsistent reporting.

In the same way as for the inclusion of email in the metric we note the intended methodology on how this will be translated to a rating, namely on the range and median of supplier performance in your exploratory. Further clarity on how the thresholds will be calculated and applied in the updated rating will be important to ensure the integrity of the overall customer service metric is maintained.

Webchat

We have seen that Webchat is inconsistently offered both in terms of the number of suppliers who do and the service provided. We agree that with the limited data this should not be included for now. We do, however, recommend that Webchat data is still asked for in the RFI, to allow monitoring of changing progress and demonstrate how this could become a measurable metric in the future.

Additional Telephone metrics

We consider call abandonment rates as an important element of suppliers' service quality and we generally see a correlation in abandonment rates and wait times. However, we note that there is not a consistent approach across suppliers taken to measuring this. Additionally, how the related use of services such as IVR and 'self-service' that can serve customers well, needs to be considered when designing the metric. On this basis we agree that they should not be included at this stage, but further work could be undertaken to refine these metrics with a view to including them in the future.

Other matters

We note the proposal to include the upcoming E.UK. Vulnerability Code of Practice in the Customer Commitments category. We are supportive of this industry initiative and would generally expect such a code to be included. However, the Code has not yet been finalised or shared with us so we're not able to comment further on this proposal at this point.

Weighting

We consider the proposal to adjust the weighting (uplifted by 5%) reflects the importance of the customer service element of the rating. It is not clear why the weighting for the billing metric, given the importance of this service, has been adjusted downwards to accommodate this rather than, for example, the customer commitments category. We note that a significant number of customers, including some vulnerable circumstances, regularly use contact channels other than the phone. We agree, however, that the weighting within this metric, with 15% allocated to call wait time, is appropriate. We consider that phone as a contact channel remains important for customers particularly when they need to get in contact urgently.

Implementation

We note the timescale for implementation of the update changes (Q1 2020). It will be key that the changes in methodology are well communicated at the relevant time (particularly at publication) given that they may have a material impact on the rankings of individual suppliers and consistent comparisons with previous periods will not be possible.

Yours sincerely,



Richard Bellingham
Head of Compliance

