

## **Energy supplier rating consultation September 2019**

### **Pure Planet response**

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

Pure Planet welcomes efforts to modernise the star rating, but we're disappointed the opportunity to review the mandatory inclusion of an inbound phone number in a digital age has not been taken.

This pre-limit to the consultation continues to disadvantage Pure Planet and will hinder the development, investment and adoption of new technologies which can have a significant boon for consumers, including the vulnerable.

We believe adding contact channels into the rating is a good thing and gives a more rounded measure to consumers. We recommend that Citizens Advice really embraces how service works in today's digital and connected world. No channels should be mandatory (whether it's telephony, email, chat, social or post) and instead suppliers only submit data based on the channels they offer. This approach has a number of benefits:

1. It's clear to consumers which channels are offered by which suppliers, which would help them choose a supplier that suits how they want to contact them
2. The rating becomes a true measure of the service performance of each supplier based on their business model
3. It removes any bias in the rating

This review provides Citizens Advice with a prime opportunity to bring its star rating up to date with the latest developments in customer service, making its star rating even more relevant for consumers.

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

Yes. A percentage responded to within 'x' days is the best measure. As consumers don't differentiate between working and non-working days it should be measured within days rather than working days.

#### **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?**

No. We think this brings an additional level of reporting complexity to suppliers and is of less relevance to consumers than the initial response time. As you mention in your paper, if suppliers are poor at timely follow up this will show in complaints numbers.

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

Not applicable.

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

We are pleased that Citizens Advice are providing a score for suppliers that provide an email service.

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

Yes, although there needs to be clear, common standards of how to measure these. Without a definitive code, there could be an unintended consequence based on how individuals choose to report their social activity. For example, suppliers may change their existing social channels to 'marketing only' so they are not included in the rating, which would then lessen consumer channel choice and lead to inconsistent or incomplete reporting, which risks consumer confusion.

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

Yes. This approach seems reasonable.

**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. This approach seems reasonable.

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

Yes. This approach seems reasonable.

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

Not applicable.

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

No.

**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 think chat is an important and growing channel of choice for consumers. It's convenient and effective. We think Citizens Advice should broaden its view around chat. There are many ways in which chat can be instigated and managed and calling it 'webchat' is a very narrow definition of chat as a contact channel.

We'd welcome the inclusion of chat into the rating.

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

Not applicable.

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

Yes.

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

Our view is that the recommended changes broadly makes sense. There are a couple of exceptions to this. Firstly, continuing to have inbound calls as mandatory. We recognise the importance of being accessible, particularly to those with vulnerabilities or in vulnerable situations. Our experience, from our own Members, is that those with some vulnerabilities specifically request no telephone contact as it causes anxiety. Therefore we think this should also be taken into consideration when deeming any channel as mandatory.

Secondly, there is an assumption that because the annual statement requirement has been removed that regular bills/statements are being sent. Timely bills/statements are a critical sign for consumers that their energy provider is managing their account well. We think it remains vitally important that consumers receive regular and timely statements and we think it's important this measure remains.

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

Yes.

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

No.

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

No.

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

We agree that this approach seems sensible.