

Jenni Lucas-Williams
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By email: to jenni.lucas-williams@citizensadvice.org.uk

6 September 2018

Dear Jenni

Energy supplier rating - consultation on a rating for smaller supplier performance

Thank you for your email of 31 July 2018 and the opportunity to comment on the proposed changes to the Supplier Rating Tool.

We welcome the move to include more suppliers in the rating and agree with your proposals on how this will work in practice. We have responded to this consultation in Appendix 1 using the question format presented.

One area of concern is that there needs to be a clear explanation of the changes to the comparison table when the new version is first published. Comparisons cannot be made with a supplier's rank in the former table as this may change with the addition of the new suppliers. It could therefore appear that customer service performance has decreased when in fact it may have remained the same or improved.

Another area for consideration is the impact that having more suppliers will have on the time it takes to publish the data. Currently the table is published in the third month after quarter end. This means by the time the data is updated, it is nearly six months out of date. While it may be difficult to increase the speed at which the table can be produced owing to the number of suppliers and the time it takes to generate the data, it is essential that timelines do not increase further to ensure customers have accurate information to make an informed decision on their energy supply.

We would be very happy to discuss this further with you. Please contact Samuel Arnold in the first instance on 07557 613 955, Samuel.Arnold@centrica.com.

Yours sincerely



Nigel Howard

Director, Consumer Policy, Centrica

Appendix 1

1. Do you agree with our minded-to option to expand the existing rating to include suppliers with over 25,000 meter points? If no, what would you suggest as an alternative approach?

As we've previously stated in our response to the July 2017 consultation on changes to the rating, we welcome moves to increase the number of suppliers in the rating. It is our belief that all suppliers, including those with less than 25,000 meter points, should be included in the rating to encourage healthy competition, full transparency and comparable standards of service for consumers.

2. Do you agree with our proposals to use the same metrics as the existing supplier rating, for suppliers with over 25,000 meter points?

We agree with the proposal to use the same metrics as the existing supplier rating. These metrics measure the performance of some of the key functions for a supplier of any size.

One potential area for consideration is how a supplier's customer base may influence the metrics. For instance, suppliers with higher proportions of vulnerable customers will likely have more customers going to the Extra Help Unit.

3. Do you support our minded-to option to lower the threshold for a supplier to have a consumer service referral, or to retain the existing requirements and remove the weighting for those under 50,000 meter points?

We agree with the mind-to option to lower the threshold. We do not believe that the requirements to have a consumer service referral represent a prohibitive cost to business and there is clear customer benefit to having these requirements in place. Again, we believe that these arrangements should be in place for all suppliers, not just those above a certain threshold of customers.

4. Do you agree with lowering the weighting to per 10,000 meter points for all suppliers as the most appropriate approach? If not, what would be a more appropriate alternative approach?

We agree that this is the right approach to take.

5. Do you agree that these are appropriate metrics for suppliers with more than 25,000 meter points? If not, please provide evidence to support your answer.

Please see response to question 2.

- 6. If Ofgem's changes proceed, do you agree with our proposal to measure bill timeliness performance based on Bills and statements only? If you disagree, please include an explanation.**

We agree that this is the right approach to take.

- 7. Are these the right communication methods to consider? Please give a reason why, and let us know if there are others we should include in this exploratory RFI. Please include details about what data you collect about these communication methods currently.**

Our main non-telephony channels are webchat, email and online messaging services. In addition to these, other channels for consideration are SMS and services like SignVideo that offer a Video Relay for British Sign Language users.

Our key measures are average speed of first response, average speed of subsequent response and quality of contact metrics attained through surveys to measure Customer Satisfaction and First Contact Resolution.

We're open to the idea of including non-telephony channels as part of the reporting metrics. However, there is a challenge in that while it is likely that all suppliers will have a telephone service, the amount and type of non-telephony channel will vary. This will make fair comparison between suppliers difficult as there will be inconsistencies in approach to non-telephony channels. For this reason, it is important that the descriptions and specific reporting requirements of each metric used is stipulated and agreed across industry to ensure comparable data is being presented to consumers.

One potential approach could be for a star rating, similar to the customer guarantees, for the range of channels that offer customers to contact them. This could also include a measure for effectiveness of the service for example, Webchat would only contribute to score if average speed of first response is below a certain time.

- 8. Do you agree with our proposal to rank suppliers with a tied rating based on their complaints score?**

We agree that this is the right approach to take.