Response to Citizens Advice consultation on the energy comparison tool

Company name: Money Super Market

Submitted on: 14 September

1. **Do you agree that the combination of the 5 metrics proposed for the first release will provide consumers with an overall view of suppliers' customer service performance? Please provide any supporting evidence for your answer**.

Broadly, yes, we agree that the 5 proposed metrics will act a good first step to providing an overall view of suppliers' customer service performance.

Having looked at the metrics in detail, we definitely think there's scope to add further granularity to them as they evolve. Citizens' Advice might also want to explore inputting more metrics in the future too.

One area we feel particularly strongly about is switching because of its importance in shaping the customer's views of their supplier's performance. It is the first interaction that a consumer has with their new supplier and a good experience will have a positive impact on their likelihood to switch again in the future, while a poor experience may make them less likely to switch again. We hear this often in our consumer research.

2. **Do you agree that the indicative weightings are an accurate representation of the importance of each metric? If you suggest any changes, please provide an explanation and any supporting evidence?**

MoneySuperMarket has two comments to make here:

Firstly, we would question whether customer service and billing should be on an equal ranking. Effective billing should, in essence, be a hygiene factor and the minimum a customer should expect. Therefore perhaps we need to find a way to reflect billing as a significant concern if suppliers get it wrong, but less of a weighting on the actual supplier ranking?

Secondly, given the importance consumers place on switching (see our comments in Q1 above), perhaps Citizens advice could consider increasing its weighting?

3. **Do you agree with the decision to limit the metrics and overall rating in the first release of the tool to the 17 largest suppliers from which we are able to collect representative data?**

We think there should be a determined effort made to find a way to include smaller suppliers in the tool. They are beneficiaries of much of the switching traffic, and consumers deserve to be able to know as much about them as possible. MoneySuperMarket is already gathering consumer feedback on these suppliers, and would be happy to explore the option to partner with CA to share this more widely. With the bulk of switching being towards smaller suppliers over the last year or two it may be dangerous to omit these suppliers from any rankings. Rapid growth periods such as these are most likely to drive customer service issues. As such, we could be at risk of ignoring those rapid growth, smaller suppliers who are arguably most likely to have problems. The wider context of market entry needs to consider capacity for growth as well.

If CA decide to proceed with a listing of 17 suppliers, we would also encourage CA to think carefully about their overall communications plan for the tool. CA would need to be very clear about why certain smaller suppliers aren't included.

4. **Do you agree that a future release of the tool would benefit from the inclusion of a performance metric about the average speed to answer telephone calls? Do you agree that the suggested scope of calls between '9am – 5pm, Monday-Sunday' is the appropriate timescale to capture this information? Please provide any supporting evidence for your answer.**

Yes.

5. **Do you agree that a future release of the tool would benefit from the inclusion of a performance metric about the accuracy of switching, based on the number of erroneous transfers? Please provide any supporting evidence for your answer.**

MoneySuperMarket would welcome further information about this. Erroneous transfers are not necessarily a measure of a supplier's performance and can arise from customers inputting an accurate (but not THE CORRECT) address. In instances such as these, suppliers would not be able to pick up the error until the impacted customer at the 'wrong' address alerts them. Erroneous transfers can also be a result of the industry addressing shortcomings which are not supplier specific.

A further point worth considering is that erroneous transfers account for less than 0.5% of switching, so we would not expect this to be a priority area.

6. **Are there any additional qualitative indicators we should be considering for future development of the tool, in order to provide the best possible information for consumers?**

Further information to be provided via a face to face meeting.

7. **Do you agree that the scoring definitions and scoring criteria proposed are appropriate to use for the comparison tool? Please provide any supporting evidence with your response.**

Yes.

8. **Do you agree that rounding supplier scores to the nearest quarter score will show sufficient granularity, while remaining clear enough for consumers to understand?**

Yes.

9. **Do you prefer the alternative scoring criteria over the initial scoring set out in Section 4.1? If so, why?**

10. **Do you agree that the proposed tool will make improvements to the experience consumers currently have when accessing Citizens Advice performance information.**