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Sent via email to thomas.brookebullard@citizensadvice.org.uk

28 October 2019

Dear Tom,

Response to 'Energy Supplier Rating: Consultation on new customer service metrics and other updates'

Robin Hood Energy is a not-for-profit gas and electricity supplier, with over 130,000 customers. We were set up by Nottingham City Council with the aim of tackling fuel poverty and providing consumers with a cheaper, fairer alternative to the six largest suppliers. We became a voluntary Warm Home Discount licensee in 2018, and have recently invested over £200,000 into a dedicated vulnerability team. We're proud to be leading the way in trying to help those members of society who need it the most.

We work with ten other local authorities, for example Leeds, Liverpool and Derby City Councils, by helping them to create their own white label tariff provider in partnership with us. We operate nationally, but have a regional focus on both Nottingham and our white label partner regions. We are pleased to be at the forefront of publicly owned energy supply.

We are fully supportive of the Energy Supplier Rating, and consider that it acts as a useful reputational incentive, helping to improve customer service standards and increase transparency across suppliers. We mostly agree with the proposals outlined in the consultation, but do not support the removal of the bill timeliness metric.

The consultation does not provide any evidence that traditionally scheduled bills have reduced and whilst we note the flexibility suppliers have to communicate billing information, we presume that the majority of consumers have not experienced any significant change. We think bill timeliness therefore remains an important metric, sufficiently different from bill accuracy and not difficult for suppliers to quantify on a comparable basis. We would recommend that Citizen's Advice (CA) retain the metric but keep it under review as the smart rollout progresses and further digitisation of the market occurs.

We also continue to disagree with the metrics used for existing categories, which CA are not proposing to change. We note that average call waiting time excludes time spent in the IVR, which allows gaming of the rating to occur, and penalizes suppliers who have a shorter IVR, which we consider to be a better customer experience. White labels being ranked separately presents a further opportunity for gaming, for example due to a triage service.

We would prefer for CA to consider the wider customer experience, incorporating response time, in order to properly assess customer service across suppliers. Inclusion into the Energy Supplier Rating would help to ensure that all suppliers are focusing on the wider customer experience. We do however agree that issue resolution time can be difficult to define and measure, for example where customer inaction leads to a delay.

Furthermore, we would encourage CA to adjust the complaints metric. We believe that inclusion (and current weighting) of advice only cases unfairly and disproportionately impacts suppliers who have a greater percentage of vulnerable consumers, given that these cases are where the consumer is unlikely to have previously contacted the supplier and/or require additional support.

The metric also does not take into account other relevant factors to consider when assessing supplier's complaints performance. For example, there is no consideration of the percentage of complaints resolved by the next working day, or how many complaints are raised which do not originate from CA or are subsequently accepted by the Ombudsman. Both figures are already provided to CA as part of supplier's monthly reporting requirements, are therefore deemed as essential performance indicators and thus would not constitute an additional reporting burden. We would be pleased to discuss this further with CA.

We are supportive of, and think there is scope for, CA using the Energy Supplier Rating for a wider assessment of supplier performance. As a minimum, this could help to increase salience of issues that may be of consumer interest, or to act as a reputational incentive. Whilst we do not explore this in detail, potential criterion could include smart rollout completion, self-disconnections or the extent to which the loyalty penalty applies (e.g. average price differential between back-book accounts and new customers).

Our responses to the questions outlined in the consultation are provided below.

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

We support the inclusion of email as a customer service metric. We agree that email is an important and widely used method of contact and should therefore be included.

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

We agree with the proposal, but CA should further consider how to better assess supplier performance for customer service. We accept that issue resolution can be difficult to define and measure, and customers may sometimes be directed towards another method of contact (e.g. telephone) for more effective resolution of the issue.

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?

We agree with the proposal, as there can often be an exchange of emails before an issue is resolved and customers should expect to receive a timely response each time. We agree with excluding secondary messages, given that customers will usually be chasing for a response to their previous email. If the customer is having to do this, it would suggest that the supplier is taking too long to reply to the original email, which will already be captured by the proposed metric.

It is however worth noting that our systems are not currently configured to capture this data, and any system changes to fulfil this reporting requirement will consequently incur a cost.

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

We have not provided a response to this question.

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

We do not have any further comments.

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

We agree with the proposal. Similar to email, social media is becoming more widely used by customers as a method of contacting their supplier. Customers have just as much of a right to a timely response on Facebook and Twitter as they do on any other medium.

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

We agree that Facebook and Twitter should be included in the Energy Supplier Rating. They are the most prevalent social media platforms, the majority of suppliers have a presence and they tend to be widely used for direct communication.

We accept that it can be difficult to distinguish between public messages which do and do not require a response, but we disagree that only direct messages should be relevant to the metric. Customers may send a public message to a supplier asking for help, and they should be able to expect a timely response to this, even if the supplier's reply asks the customer to send a direct message.

CA should also be mindful of the opportunity for gaming to occur. For example, by adjusting user settings to prohibit direct messages from accounts which are not followed by the supplier.

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?

We agree with the proposal, although we question how difficult it is for suppliers to create and maintain social media accounts, and to be responsive to customers through them. We also note that the majority (if not all) of suppliers within the scope of the Energy Supplier Rating will already have a social media presence on Facebook and Twitter.

We agree that suppliers who have a social media presence but do not respond to customers should be penalised. If a supplier is using social media for its own benefit, to publicise itself and attract new customers, then it ought to be able to use it to reply to messages from customers.

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

We agree with the proposal. It should not be sufficient for a supplier to respond to a message quickly and obtain a high rating, whilst not actually providing the customer with helpful information.

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

We have not provided a response to this question.

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

We would suggest that CA continue to monitor for uptake of other contact methods, for example two-way texting or Instagram, to ensure that the channels currently assessed remain appropriate.

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?

We agree with the proposal.

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

We do not have any further comments.

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

We agree with not including telephone abandonment rates. There are many reasons for why a call might be abandoned, for example announcements in the call queue signposting towards information on the supplier's website. If calls are abandoned because customers are having to wait too long, this poor performance will be captured by the data on average call waiting time.

On telephone ringbacks, it seems sensible that if they are not widely offered by suppliers, and good quality data is currently unavailable, then they should not be included within the rating. It would be reasonable to assume that telephone ringback volumes are correlated with average call waiting time (e.g. suppliers with a low average call waiting time should not need to use telephone ringbacks as much).

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

We disagree with the proposal, and refer CA to our previous responses. We do not believe that bill timeliness should be removed as a metric, whilst the complaints and average call waiting time metrics are not sufficiently measuring supplier performance.

We would also encourage CA to periodically review the extent to which a 5% weighting is appropriate for social media. For example, it does not seem reasonable for a supplier receiving only 10 direct messages to answer these quickly and improve their rating, in order to counteract inadequate email performance at larger volumes.

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

We agree with the proposal, subject to a review of the content and governance of the Code of Practice.

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

We do not have any particular comments. We consider the Company Commitments to be a useful element of the rating, appropriately weighted, and intend to sign up to at least one shortly.

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

We do not have any particular comments. We mostly agree with the minded-to proposal stated by CA, but would welcome visibility of the impact this change would have on our performance against a 'do nothing' option.

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

We agree that switching timeliness should correspond with the new Guaranteed Standards. It is important that a consistent standard is applied, so that customers know what they are entitled to expect from suppliers.

I hope you find our response useful. If you have any queries, please do not hesitate to contact me.

Kind Regards,

Matthew Robson
Head of Regulation & Compliance
Robin Hood Energy