Energy Supplier rating

Consultation on new customer service metrics and other updates

September 2019

citizens advice

Contents

Summary

Citizens Advice provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. From 1 April 2014, Citizens Advice took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain. The Citizens Advice energy supplier rating serves as part of this statutory function.

First published in 2016, the star rating provides consumers with accessible information about energy supplier performance and enables consumers to make more informed switching decisions. It is published on our website and integrated into the results page of our price comparison website (PCW).[1]

We are always looking for ways to continually improve the rating and maintain its relevance. The current proposed updates have followed the timeline below:

- In our decision document published in October 2018, we confirmed our intention to issue an exploratory RFI with a view to updating the customer service metric in the star rating[2].
- In January 2019, the exploratory RFI was issued to suppliers currently in the rating, asking for information on prevalence and response time for various customer service channels.
- In June 2019 we invited all domestic suppliers to attend a workshop or webinar to present our findings and to discuss possible changes to the rating.

After reviewing the data from the exploratory RFI and the feedback from the workshop and webinar, we have developed the following minded-to proposals:

- To update the customer service metric in the rating to include email and social media.
- Not to include telephone ringbacks and dropped calls as new metrics in the rating.
- Not to include web chat as a metric, but to return to this at a later stage.

We are also asking stakeholders to provide evidence of any research they have on customer expectations for response time for social media and email.

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[1]https://www.citizensadvice.org.uk/about-us/how-citizens-advice-works/citizens-advice-consumer-work/supplier-performance/energy-supplier-performance/compare-domestic-energy-suppliers-customer-service/
[2]https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/FINAL_DecisionDocOct2018_consultation%20smaller%20suppliers%20rating.pdf

Stakeholders are also asked to provide feedback on proposed ways of incorporating the new metrics into the existing rating.

In addition to our minded-to proposals on updating the customer service metric, we also propose the following:

- To include the Energy UK Vulnerability Code of Practice in the rating.
- To change the reporting period for Energy Ombudsman data in the rating from acceptance date to completion date.
- To align our switching metric with Ofgem's proposed approach for the switching Guaranteed Standards, if these are confirmed.

We are also making the rating available under licence and free of charge to price comparison websites and auto switching services providing they sign a licence agreement with Citizens Advice.

Please provide your response to the questions in this consultation document by October 18th 2019.

Current design

We give suppliers a score out of five in each category. A weighted average of these scores is then used to produce an overall rating out of five.

The categories were chosen and weighted based on consultation with stakeholders.[3] In each category a specific metric is used to measure supplier performance. The rating is currently based on the below metrics.

Table 1: Current rating design

Category	Weighting	Metric	Data source
Complaints	35%	Existing complaints ratio	Ombudsman: Energy (OS:E), consumer service (CS), Extra Help Unit (EHU)
Billing	20%	Accuracy of bills	RFI
		Timeliness of bills	RFI
Customer service	20%	Average call waiting time	RFI
Switching	15%	Switches completed in 21 days	RFI

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[3]https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20decision%20document.pdf

Customer commitments	10%	Membership of the Energy Switch Guarantee, PPM Principles, Safety Net and British Standard for Inclusive Service Provision	Publicly available

The current customer service metric was introduced in the Q4 (Oct - Dec) 2017 release of the rating. Currently the customer service metric includes average call centre wait time and is weighted as 20% of the overall score. The metric and weighting were decided in consultation with stakeholders. For more information about the current metrics you can check our decision document.[4]

At the time, most respondents agreed that telephone is a key contact route, although there was a general view from respondents that other contact methods were growing in importance. However, results from the RFI we submitted at the time showed that data on other contact methods were less consistent across suppliers. Therefore we chose not to include other contact channels at the time.

However, we recognised that consumer preferences were changing and were keen to include other methods in the future. In a decision document in October 2018 we confirmed that we would issue an RFI to collect data on the prevalence and response times/availability of various methods.[5]

Exploratory RFI and supplier workshop/webinar

The exploratory RFI was sent to all suppliers who were currently in the rating or were due to join in the next release of the rating. 32 suppliers out of 42 responded to the exploratory RFI. You can view a copy of the original exploratory RFI and proforma here and here.

The exploratory RFI requested data from Q2 2018 and Q3 2018, and asked for information on the following metrics: telephone ringbacks and dropped calls, social media, emails, and webchat. Where suppliers were unable to provide data we requested an explanation of why this data was unavailable.

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[4]https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20decision%20document.pdf
[5]https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/FINAL_DecisionDocOct2018_consultation%20smaller%20suppliers%20rating.pdf

We invited all domestic suppliers to attend either a workshop or webinar in June 2019 to discuss the findings of the exploratory RFI, and discuss future changes to the methodology. In total 52 representatives from 31 suppliers signed up to the workshop and webinar. We also received feedback from suppliers via email. Thank you to all suppliers who responded to the exploratory RFI, and to all suppliers who attended the workshop or webinar. Further details of the feedback from the webinar and workshop can be found in the appendix at the end of this document.

Proposals for metric update

As in our previous consultation, we have proposed new Customer Service metrics by following a number of high level principles.[6] We began by considering the range of metrics that are important to the consumer experience in each category. These must accurately reflect the performance of each supplier in the relevant areas, while remaining simple enough to be readily understood by consumers.

Proposed metrics need to pass two tests:

- **Are the metrics appropriate measures of performance?** We have set out evidence that the metrics are important to consumers, and are seeking further views through this consultation.
- **Is the data robust and comparable across suppliers?** This will be tested through an information request (draft issued alongside the consultation document).

We also assessed what types of data would be available to measure performance for each metric. There are two main approaches to this:

1. **Quantitative supplier performance data.** This is how we currently assess performance in relation to switching, billing, and our current customer service metric.
2. **Assessment of supplier services.** This is how we currently assess performance in the 'customer commitments' category.

We have favoured the first approach where possible, as this is based on actual supplier performance. This also improves transparency by making more performance information available, in line with our aims for the project. Quantitative performance data collected for the rating needs to be robust and

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[6]https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20consultation%20on%20proposed%20changes_v2.pdf

comparable across suppliers. It must also be possible to collect in a timely manner for the rating. We have sought to limit the burden of information requests on industry by requesting data that is already collected by suppliers, where possible.

We have not proposed scoring thresholds for the new metrics at this stage. Scoring will take account of both the range of performance and the average across suppliers. We will also consider any benchmarks for best practice which already exist within industry.

Email

Exploratory RFI data

In the exploratory RFI we asked suppliers to provide:

- information about the total number of email contacts they received during the reporting period;
- information about the number of emails 'answered substantively' in 1, 2 and 5 working days;
- the average time taken to 'substantively respond' to email queries during the reporting period.

All suppliers who responded to the exploratory RFI were contactable via email, and email had the second highest number of contacts during the reporting period (based on the available data). After telephone, the highest number of suppliers were able to provide data on response time for email.

The data for the average time taken to 'substantively respond' to an email was of poor quality. However, **19 out of 32 suppliers provided data of good enough quality to compare information on the number of emails 'answered substantively' in 1, 2 and 5 working days**.

The range and median supplier performance over the 2 quarters, as a percentage of emails answered within 1, 2 and 5 working days is shown below (figure 1). The data shows that performance varies considerably between suppliers.

Figure 1: the range and median performance of supplier over Q2 and Q3 2018 as a percentage of emails answered in 1,2 and 5 working days

Stakeholder views from workshop/webinar

Based on the high numbers of customer contacts to suppliers via email, and the relatively high quality of the data we received, we proposed the inclusion of email as a metric and discussed this with respondents.

Respondents were overwhelmingly positive about the inclusion of email as a metric in the rating. Suppliers agreed that this was a very important method for consumers to get hold of their supplier.

Our minded-to proposal

We propose taking forward email as a metric in measuring customer service performance. The data we received in the exploratory RFI showed that email is routinely offered by suppliers, and is an increasingly common method used by customers to contact their supplier.

We propose to continue with response time as our measure of supplier performance, rather than issue resolution time. Although some respondents felt that issue resolution time was a better reflection of customer experience, other respondents felt that this would be more difficult to measure and could be open to interpretation. We feel that the quality of contact is likely to be reflected in our complaints metric. We believe that suppliers with better quality responses are likely to receive fewer additional contacts via email and other methods, and are likely to see fewer complaints to third parties.

We propose to measure the response time to all emails from a consumer in a thread, rather than just the initial message. However, we propose to discount subsequent/secondary messages that are sent by a customer in between supplier responses.

We propose to make email a mandatory customer service metric, and therefore score suppliers zero if they do not offer it. While some suppliers were concerned that this would be too prescriptive, we feel that email is an essential communication channel. The results of the exploratory RFI showed that all suppliers who responded were contactable via email. Forthcoming research emphasises the importance of email to consumers as a communication channel. [7] Email is also a required channel for customers to make complaints.[8]

In light of respondent requests for the benchmark (eg 1 working day, 2 working days etc) to be set based on customer expectations research, we explored existing research. We were unable to find any sector specific research that could

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[7] Citizens Advice/Institute of Customer Service - forthcoming research, 2019
[8] The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

guide our decision. We request that respondents to the consultation share any relevant research or insight on customer expectations of email response time with us, to help guide our decision making.

We will base our scoring thresholds (eg the proportion of responses within the benchmark required to achieve a particular score) in part on the range and median supplier performance in the exploratory RFI.

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

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

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?

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

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

Social media
Exploratory RFI data

In our exploratory RFI we asked suppliers to provide data on:

- the total number of social media contacts received during the reporting period;
- the average time taken to respond to a social media message from the time it was received;
- the number of social media messages answered within an hour of receipt, excluding automated responses and time outside the channels' advertised opening hours.
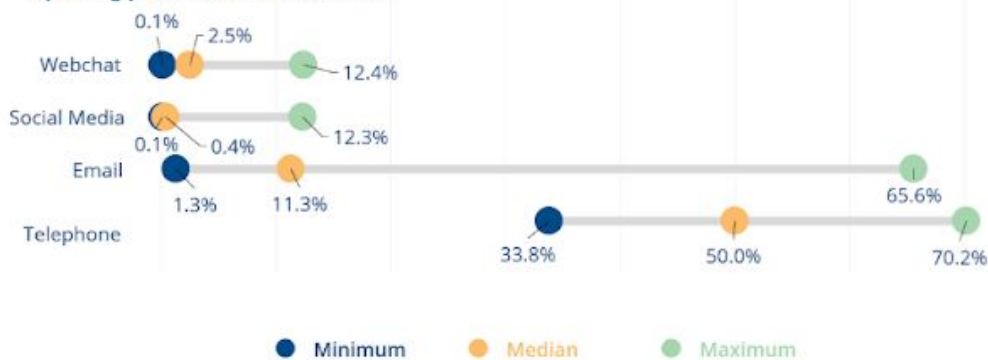
Not all suppliers were contactable via social media, and not all suppliers who were contactable via social media were able to provide prevalence and response time data. While social media was a less frequently used contact channel than email, it was still a common way for consumers to contact their supplier and a more prevalent channel compared to webchat. Figure 2 below shows the range

and median percentage of contacts across all supplier for 4 channels across the reporting period.

As well as more suppliers offering social media than webchat, more suppliers were also able to provide data of sufficient quality to compare social media response times across suppliers. As discussed below, differences in the way webchat is used by suppliers poses challenges when comparing response time. This is not an issue with social media.

- For the percentage of social media messages answered in one hour - 15 out of 32 suppliers were able to provide data of sufficient quality to compare.
- For the average time taken to respond to social media messages - 14 out of 32 suppliers were able to provide data of sufficient quality to compare.

Figure 2: the range and median percentage of contacts across suppliers for 4 channels across the reporting period (Q2 and Q3 2018)

The figure below shows the range and median supplier performance for each of the 2 quarters, as the average time (hours) to answer a social media query (figure 3). The data shows that performance varies notably between suppliers and across the two quarters, with some extreme outliers.

Figure 3: the range and median supplier performance for Q2 and Q3 2018, as the average time (hours) to answer a social media query

Stakeholder views from workshop/webinar

Based on the reasonably high number of suppliers who were contactable via social media, and the relatively high quality of data we received, we discussed the inclusion of social media with suppliers during the workshop and webinar.

Overall respondents were positive about the inclusion of social media as a metric in the rating, and they generally agreed that this was an increasingly important way for customers to contact their supplier.

Our minded-to proposal

We propose taking social media forward as a measure of customer service performance. Although not all suppliers are contactable via social media, the exploratory RFI results suggest that it is growing in importance. The data we did receive also indicates that it will be possible to compare supplier performance. Stakeholders were generally supportive of including social media as a metric.

We propose to continue with Twitter and Facebook as the contact channels for social media, and to only measure contacts via direct (private) messages. Feedback from the workshop and webinar suggests that it would be more difficult to distinguish between public messages which do and do not require a response.

We propose to measure the response time to all messages from a consumer, rather than just the initial message. However, we propose to discount the response time to subsequent/secondary messages from the consumer sent between supplier responses.

We propose that social media should be included. The results from the exploratory RFI indicate that not all suppliers are contactable via social media. In light of this, we feel that making social media a mandatory part of the rating would be too prescriptive. However, in line with feedback during the workshop and webinar, we take the view that suppliers who choose to have a presence on a social media channel should be contactable via that channel. Therefore, we propose to score suppliers zero for this metric if they have a presence on Facebook or Twitter but do not respond to consumers who contact them via these channels (or do not provide data). The only exception is if a supplier's social media channel (Twitter or Facebook) is clearly marked as solely for marketing purposes.

In light of feedback, we have decided to clarify what we mean by 'respond to' social media messages. We propose to change this to 'answer substantively'

which excludes automated responses or messages which do not address the issue.

However, based on supplier feedback we understand that not all issues can be answered over social media. Therefore, we propose that 'answered substantively' includes cases where a supplier effectively migrates a consumer over to a more suitable contact channel where the issue can be resolved.

In line with respondent requests, we looked for existing customer expectation research to help us set appropriate benchmarks for response time. We were unable to find any relevant research that we could use. We request that respondents share any relevant research that could help shape our decision when setting thresholds.

We propose to base the scoring threshold on the range and median supplier performance in the exploratory RFI.

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

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

Q8: Do you agree with our 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?

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

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

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

Webchat

Exploratory RFI data

In the exploratory RFI we asked suppliers for:

- data on the total number of webchat contacts received during the reporting period;
- the average time for the customer to be connected to an advisor;
- data on the number of webchats connected to an advisor in 1, 2 and 5 minutes;
- the proportion of webchat conversations abandoned before being connected to an advisor; and,
- qualitative feedback on the type of webchat system they used.

Of the 32 suppliers who responded to the exploratory RFI, only 11 both offered webchat during the reporting period and were able to provide data on the total number of contacts received. For those suppliers who do offer webchat as a communication channel and were able to provide contact data, this was one of the most common channels for consumers to contact their supplier.

Only 7 of the 32 suppliers were able to provide data on the average time for a customer to be connected to an advisor on webchat, with even fewer suppliers being able to provide data on the number of customers connected in 1,2 and 5 minutes.

Where suppliers did offer webchat, answers to the qualitative question revealed numerous differences in the type of webchat systems suppliers used. Some suppliers only offer webchat during less busy periods, whereas other suppliers offered it during busy periods. Further issues raised by suppliers are provided in the Annex.

Stakeholder views from the workshop/webinar

The results of the exploratory RFI identified several issues with using webchat as a customer service metric. In particular many suppliers do not offer webchat, and the quality of the data received for those who do was poor. Additionally, the results of the qualitative question revealed significant differences in the webchat system used, raising serious questions about the ability to compare performance across suppliers.

In light of these issues, we propose not to include webchat as a customer service metric at this stage. However, given webchat's growing importance as a communication channel, we propose to reconsider its inclusion at a later date.

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?

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

Additional telephone metrics

Exploratory RFI data

We asked suppliers for additional data around telephone contacts with a view to potentially expanding our existing call centre wait time metric.

We asked suppliers for information about telephone abandonment rates. This included:

- data on the total number of telephone calls which were placed in a queue to speak to an advisor during the reporting period;
- data on the number of telephone calls ended by the customer while waiting in the queue to speak to an advisor.

28 of 32 suppliers were able to provide data of sufficient quality to compare the number of telephone calls ended while consumers were waiting to speak to an advisor. However, an analysis of the data comparing it to average call centre wait time during the same period suggested a correlation between supplier performance in the 2 metrics. This raised questions on the value of including this in addition to the existing call centre wait time metric.

Respondents to the RFI also pointed out that that telephone abandonments may be the result of effective signposting in the IVR. This raised concerns about whether this metric may actually be measuring good practice as opposed to poor performance. Therefore we propose not to include telephone abandonment rate as a customer service metric going forward.

In addition to telephone abandonment, we asked suppliers for information about scheduled telephone ringbacks. We requested data on:

- the number of telephone ringbacks which were arranged during the reporting period;

- the number of scheduled telephone ringbacks which were completed within a scheduled time slot or within 5 minutes of a scheduled time during the reporting period.

We also asked suppliers to provide qualitative information about how telephone ringbacks are arranged.

The quality of data received on this metric was poor. A large number of suppliers do not offer scheduled ringbacks, while some suppliers do offer scheduled ringbacks but do not record performance in this area. Additionally the results of the qualitative question revealed significant differences in the way ringbacks are used, which could make it difficult to compare performance across suppliers.

Stakeholder views from the workshop/webinar

Respondents during the workshop and webinar generally agreed that telephone abandonment rates and telephone ringbacks should not be included as additional customer service metrics. Respondents raised similar concerns to those expressed in the exploratory RFI around issues of comparability and the possibility that the metric could measure good practice rather than poor performance. Therefore, we propose not to include telephone abandonment rates and scheduled ringbacks as additional customer service metrics.

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

Proposals on incorporating the new metrics into the overall rating

Stakeholder views from the workshop/webinar

During the workshop and webinar we asked suppliers for their thoughts on incorporating the new metrics into the overall star rating. There was no consensus around this.

Our minded-to position

Citizens Advice are conscious that consumers increasingly prefer to contact their supplier in different ways. However, we continue to believe that phone lines

remain crucial, especially for consumers in vulnerable circumstances or in emergencies.[9] This position was echoed in the final report from the Commission for Customers in Vulnerable Circumstances.[10] Telephone remains the most commonly used channel in general, with 31 suppliers receiving 41,916,896 telephone contacts in Q2 and Q3 2018[11]. Telephone is also a required channel for consumers to make a complaint, an obligation that most suppliers meet by having an inbound telephone service.[12]

Therefore, we will continue to keep the phone line as a mandatory metric in the star rating, and will continue to score suppliers zero for this component of the metric if they do not offer one. We also propose to give call centre wait time the highest weighting in the updated customer service metric, making up 15% of the overall score. However, as above, we believe that new communication channels are increasingly important. We are aware that the new reporting requirements will require supplier time and resources, and are therefore keen for the weighting of these metrics in the rating to reflect this.

We propose that suppliers who are contactable via email and social media receive a 5% score for each metric. Suppliers who do not have a presence on social media would therefore receive a 10% score for email. The overall customer service metric would increase to 25% of the overall rating (with call centre wait time making up the remaining 15%). The overall metric breakdown, if our minded-to proposal were adopted, is shown below:

Earlier this year, Ofgem introduced a number of principles-based rules for customer communications, to encourage innovation and improve how suppliers communicate with their customers.[13] This included removing the requirement for suppliers to provide annual statements altogether, meaning there is no longer a requirement for regularly scheduled communications for prepayment customers. The changes also mean that fewer customers with credit meters are likely to receive traditionally scheduled bills, especially as the smart meter rollout progresses.

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[9]https://wearecitizensadvice.org.uk/why-energy-suppliers-need-to-keep-their-customer-phone-services-513b568848b1

[10] https://www.energy-uk.org.uk/publication.html?task=file.download&id=7140

[11] One supplier did not provide total contact data for telephone

[12] The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

[13]https://www.ofgem.gov.uk/system/files/docs/2018/12/final_decision_-_customer_communications_rule_changes.pdf

In light of these changes, we think the bill timeliness metric will be less relevant. Our review of the customer service methodology in 2017 also found that bill timeliness may be less relevant to consumers than bill accuracy.[14]

Therefore, our minded-to proposal is to remove the bill timeliness element of the rating altogether. We will retain the bill accuracy element of the rating. Accurate billing remains a vital part of customer service for most customers, and the most common complaint area to our consumer service is still billing errors.[15] As such, we propose adjusting the billing element of the rating to 15%, such that bill accuracy increases from 10% to 15% of the total score. We will retain the requirement for a supplier to have had 5,000 customer accounts paying by a method other than prepayment for more than a year in order to receive a score in the accuracy metric. Suppliers which do not meet this requirement are scored on the other metrics only, with their rating adjusted upwards to give a result out of five.

Table 2: Rating design with our minded-to proposal

Category	Weighting	Metric	Data source
Complaints	35%	Existing complaints ratio	Ombudsman: Energy (OS:E), consumer service (CS), Extra Help Unit (EHU)
Billing	15%	Accuracy of bills	RFI
Customer service	15%	Average call waiting time	RFI
	10%	Email	
		Social Media	
Switching	15%	Switches completed in 21 days	RFI
Customer commitments	10%	Membership of the Energy Switch Guarantee, PPM Principles, Safety Net and British Standard for Inclusive Service Provision	Publicly available

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[14]https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20consultation%20on%20proposed%20changes_v2.pdf
[15]https://www.citizensadvice.org.uk/about-us/difference-we-make/advice-trends/consumer-advice-trends/consumer-advice-trends-20182019/

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

Energy Industry Changes

We set out in 2019 to review the star rating to ensure we incorporated the way that energy consumers experience customer service was reflected in the rating. Since beginning this work, industry changes which will have implications for the star rating have also been announced. We would welcome your comments on our proposals to incorporate the three industry developments outlined below.

1. Minded-to proposal on incorporating the new Energy UK Vulnerability Code of Practice into the rating

Citizens Advice supports the recommendations of the Vulnerability Commission and the development of a meaningful Code of Practice that will deliver positive outcomes for consumers in vulnerable circumstances. Our current intention is to recognise the new Code of Practice in the supplier star rating. The detail of the weighting decision will reflect two factors: the content of the Code of Practice; and, its governance structure.

On content, we would expect that the protections currently recognised by the star rating in the Prepayment Meter (PPM) Principles and the Safety Net to be present alongside the strong steer on new content from the Commission report. We will consider the extent to which these protections go beyond the minimum requirements in licence as part of our decision about the score associated with the Code of Practice in the star rating.

On the governance structure, we understand a balance needs to be struck by the level of oversight of signatory compliance and the range of possible signatories. For example, an onerous audit regime may mean fewer suppliers are able to apply, while very limited oversight may lead to non-compliance. We agree with the Commission that consistency across signatories is absolutely crucial for the success of this new Code of Practice. To include the new Code of Practice in the star rating, we would expect to see regular oversight by a governance board on key KPIs that would provide a regular challenge to energy suppliers.

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

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

2. Minded-to proposal on changes to the way that Energy Ombudsman data is used in the rating

Energy Ombudsman complaints data (alongside Consumer Service and EHU) form an important part of the complaints metric of the rating. Currently for the purposes of the rating, the reporting quarter for Ombudsman cases refers to all cases which were accepted as over 8 weeks, or via an 8 week letter during that period. The current disputes process allows suppliers to dispute cases that they believe should not have been logged against them. Following recent changes to Ombudsman processes, the Case Acceptance field is now solely based on client perception, and therefore has lead to a significant increase in disputes between energy suppliers and the Energy Ombudsman.

Citizens Advice and the Energy Ombudsman are in discussions regarding alternatives to how to use the Ombudsman data within this process. Citizens Advice is now seeking views on the principles that would underpin the new process. This will inform our work to agree a revised process with the Energy Ombudsman.

1. Disputes reporting will be exchanged on a quarterly basis to allow time for energy suppliers to complete the disputes process in a timely manner.
2. The reporting quarter for Ombudsman cases will refer to all 8 week cases which were completed during the reporting period as opposed to 8 week cases accepted.
3. A new disputes proforma and accompanying guidance document will be issued to all suppliers included in the current processes.
4. Quarterly reconciliation to ensure the removal of any duplicate disputes.

While there will still be a disputes process for suppliers, the volume of disputes would decrease significantly. The advantage of this process change would be that the risk of delay to the rating would decrease, and the burden on resources across suppliers, the Ombudsman and Citizens Advice would ease significantly.

One possible issue that we identified with the process is that while we transitioned from using acceptance data in one quarter (Q1) to using completion

data in the next quarter (Q2), there would be some duplication - i.e. there will be cases accepted in Q1 that will be completed in Q2 and therefore will count against suppliers in two separate scorecards.

We ran analysis comparing the two methods in October-December 2018 (accepted) and January-March 2019 (completed). Through this we found that duplicates were easily identifiable. Therefore, our minded-to proposal is to remove any duplicates from the first 'case completed' quarterly data set. We will not only look at the previous quarter's case acceptance data set, but also cases accepted 2 quarters ago, to ensure that there is no duplication with cases that took longer to investigate.

We also ran an analysis comparing the completed cases data for January-March 2019 with acceptance case data for the same period. To ensure a fair comparison, we removed all accepted disputes from the data. We found that the impact was minimal across most suppliers, and any changes were not unlike changes in ratio/rank when moving from quarter to quarter using the same dataset. We also calculated the organic performance change from October-December 2018 (completed) and January-March 2019 (completed) and removed this from the analysis, which reduced the impact of the change even further. The purpose of this final step was to remove organic performance change as confounder.

Q18: Do you have any comments on the opportunity to dispute the reports from the Energy Ombudsman in the star rating processes?

3. Minded-to proposal on changes to the way we measure switching timelines to align with Ofgem Guaranteed Standards Proposals

We believe it is important that wherever possible in the rating we align with the regulatory requirements that benefit consumers and avoid the duplication of standards. We understand that in its proposals for phase 2 of the Guaranteed Standards for switching, Ofgem will set the starting point for the switch as the date the gaining supplier receives a completed application. This aligns with the current wording used in the Energy Switch Guarantee and accounts for the operation of certain PCWs in processing transactions.

This measure is slightly different to our current approach in the rating, which is to measure switching time from the day that a consumer enters the contract

with the supplier. This approach aligns with the licence definition of the switch start date[16] and a regular Ofgem information request on switching speed sent to some large and medium suppliers.

We expect the Guaranteed Standard, with related compensation requirements, to be the more relevant measure for consumers in the rating. As a result we propose, subject to confirmation, aligning the measure within the star rating to the proposed approach for the Guaranteed Standards.

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

Proposed timescales for updates

September 19th - Citizens Advice send consultation document to suppliers

October 18th - Deadline for suppliers to submit responses

November 2019 - Citizens Advice publish decision document

December 2019 - Changes implemented for Q1 2020 reporting period

Next steps

Citizens Advice welcomes responses from suppliers, key stakeholders and any other interested parties on the issues raised in this document. Responses to this consultation should be submitted before the deadline of 19th October 2019. Our preferred method of response is by email, to:

Thomas.brookebullard@citizensadvice.org.uk

Responses may also be sent by post to:

Thomas Brooke Bullard
Citizens Advice
200 Aldersgate Street
London
EC1A 4HD

Citizens Advice will acknowledge all consultation responses received. Please remember to state your contact details in your response. Citizens Advice will publish responses to this consultation on its website and may refer to their

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[16] SLC 14A.12(a)

contents in subsequent publications. If you wish all or part of your response to remain confidential, or if you would like it to be published anonymously, please indicate this in the response.

Our previous consultations

October 2018: **Decision document on a rating for smaller supplier performance**

July 2018: **Consultation on a rating for smaller supplier performance**

February 2018: **Decision on supplementary proposals**

November 2017: **Decision on energy supplier rating review and consultation responses**

July 2017: **Consultation on changes to the energy supplier rating**

October 2016: **Decision on improving energy supplier performance information and consultation responses**

July 2016: **Consultation on improving energy supplier performance information**

Annex
Email - views expressed by suppliers
Other views raised:

- Some respondents felt that it would be better to measure issue resolution time than response time. They felt that this was a more accurate measure of consumer experience.
- Respondents requested clarification on whether we would be measuring the response time to the first customer email, or to all subsequent emails.
- Some respondents were concerned about the impact on measurement of customers who sent multiple messages before receiving a response from a supplier.
- Respondents were split on the question of whether suppliers should be penalised for not offering email as a contact method.
- Respondents felt that we should be clearer in our definition of working hours, and our definition of 'substantively answered', in order to ensure better quality comparable data.
- Respondents generally felt 1 working day was a shorter time period than most consumers would expect a response to an email.
- Several respondents said that thresholds for performance on this metric should be based on research showing consumer expectations.

- One respondent suggested that the weighting of the new customer service metrics should be linked to the proportion of contacts a supplier receives via that channel.
- Onerespondent suggested that there should be no mandatory communication channels, and that suppliers should achieve a flat score for the number of channels they offered.

Social media - views expressed by suppliers
Other views raised:

- In general, respondents felt that Facebook and Twitter were the best channels to measure, and that we should only measure direct (private) messages.
- Some respondents felt that some of the language was unclear, in particular what it meant to 'respond' to a social media message.

- Respondents requested clarification on whether we would be measuring the response time to the first customer social media message, or to all subsequent messages.
- Respondents also requested clarification on the impact when customers sent multiple messages before a supplier response.
- Most respondents felt that suppliers should not be penalised for not offering social media as a communication method. However, many respondents felt that if a supplier had a presence on social media they should be contactable.
- Generally, respondents felt that consumers expect faster response times for social media than email.
- Several respondents said that thresholds for performance on this metric should be based on research showing consumer expectations.
- One respondent suggested that the weighting of the new customer service metrics should be linked to the proportion of contacts a supplier receives via that channel.
- Onerespondent suggested that there should be no mandatory communication channels, and that suppliers should achieve a flat score for the number of channels they offered.

Webchat - additional view/comments

However, where suppliers did offer webchat, its popularity suggested that it is an increasingly important way for consumers to contact their supplier. Therefore, in the workshop and webinar, we discussed the feasibility of overcoming these issues in order to include webchat as a customer service metric.

Respondents overwhelmingly agreed that webchat was an increasingly important way for consumers to contact their supplier. However, respondents were unable to suggest ways to overcome the concerns around the ability to compare performance across suppliers. In general, respondents agreed that, for the time being, webchat would not be a feasible metric.

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