

Complaints Signposting Audit

Audit of energy supplier
signposting to the Citizens
Advice consumer service
and Ombudsman Services:
Energy



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Summary

Citizens Advice has helped over 200,000 people in the past year with energy issues; around 800 every working day. We receive almost a million hits on our energy advice pages a year - over 100 visits an hour. Clearly, consumers are not always satisfied with the service and information they receive.

It's therefore important that suppliers adequately signpost consumers to their complaints processes and maintain up to date information about the support services that are available to consumers. That's why, since 2013, we've run regular audits to encourage suppliers to improve their performance in this regard and to provide consumers with a consistent approach, no matter what supplier they're with¹.

This year, we've extended the audit to non-domestic suppliers for the first time, in recognition that the complaints handling regulations that place obligations on domestic suppliers also place obligations on non-domestic suppliers for micro businesses.

What is this audit based on?

We conducted the audit based on the most important documents that should contain complaints signposting information. These were: websites, bills, annual statements (domestic suppliers only), notices of contract variation, contracts, complaints leaflets and 8 week/deadlock letters. All suppliers were scored according to a comprehensive set of criteria described in the Introduction and specified in Appendix A. The audit criteria were agreed with an industry working group in 2013.

What are the key findings?

Our **key findings** are:

- On average, domestic suppliers have **improved** their complaints signposting in **every audit category** since we conducted our last audit in 2014
- However, this **masks variable performance**, with several suppliers seeing **worse** performance in key audit criteria
- Scores for non-domestic suppliers are **consistently worse** than for domestic suppliers, with some suppliers providing **almost no signposting to complaints processes and support services** for their consumers at all

Overall, we find welcome signs of improvement. However, after three years of undertaking this audit, we had hoped that the vast majority of domestic suppliers would be offering consistent, high quality complaints signposting information. For certain categories, such as for 8-week and deadlock letters (where suppliers largely use standardised text provided by the Ombudsman Services: Energy), signposting is largely consistent. However, for most audit criteria, this is still not the case.

We also think it's clear that the voluntary approach for non-domestic suppliers isn't working. As we've argued consistently, Ofgem should take steps to ensure that

¹ Prior to consulting on the expansion of the domestic supplier complaints handling model, we assessed the link between the quality of signposting and third party complaints figures. We found that contacts to third parties in the domestic market consultation did not directly correlate to the standard of signposting.

non-domestic suppliers give the advice and redress signposting that their consumers are entitled to.

What will suppliers do now?

All suppliers have been issued with a report on the findings of the 2016 audit. As with the previous audits, each supplier is given their own scores across each communication type, with detailed suggestions as to how they can bring their communications in line with Citizens Advice specifications. Many suppliers have already undertaken to implement our recommendations.

2. Introduction and Objectives

2.1 Introduction

Citizens Advice has provided support to 200,000 energy consumers in the past year and our energy advice pages have been accessed almost one million times. When consumers aren't satisfied, it's important that they have access to consistent, well-signposted complaints procedures.

We also regularly publish a domestic energy supplier performance league table, which provides relative energy company performance on complaints.² In the past, suppliers have expressed concern that better signposting resulted in more complaints, which reflected badly on those companies who were making it easier for customers to complain. However, in prior audits we have not been able to substantiate this claim and we have not found any correlation between contacts to third parties and standards of signposting.

Since 2013, we have conducted two audits of suppliers' complaints signposting. The report on prior audits can be found [here](#)³. This aimed to identify good and poor practice, and to provide clear and actionable advice about how signposting could be improved.

Significant improvement was measured across the two audits for many suppliers. However, we decided to rerun the audit in 2016, to encourage suppliers towards even greater consistency and to reflect the number of new entrants to the supplier market.

Our remit also includes representing the needs of and providing advice to micro businesses⁴. To this end, we decided to extend the 2016 audit to include non-domestic suppliers, both in recognition that regulations place the same requirements on them to inform micro businesses about their complaints handling procedures⁵ and to encourage them to provide consistent complaints signposting information to their customers.

Ofgem requires domestic energy suppliers to signpost their customers to both the Citizens Advice consumer service and Ombudsman Services: Energy at different stages of the customer journey and in a number of different locations, including websites, bills and other customer correspondence.

The Citizens Advice consumer service provides domestic and microbusiness consumers with help and advice in all matters connected with their energy supply, including switching supplier and making complaints. The service is also the main referral gateway to the **Extra Help Unit**, which provides specialist case handling support to the most vulnerable consumers.

Ombudsman Services: Energy is an independent redress scheme for domestic and micro business consumers wishing to make a complaint about their energy company.

² [Citizens Advice energy supplier performance model](#)

³ [2014 Clear Connections audit report](#)

⁴ [Ofgem key terms guide](#)

⁵ [The Gas and Electricity \(Consumer Complaints Handling Standards\) Regulations 2008](#)

While non-domestic suppliers have the same regulatory requirement to signpost micro businesses to their complaints processes and to the OS:E, they are not required by licence to provide their customers with the same range of documents or detail as domestic suppliers. However, we strongly encourage non-domestic suppliers to achieve the same quality of signposting for consumers as is required in the domestic arena. Indeed, this was one of our key asks in the non-domestic part of our response to the recent Competition and Markets Authority (CMA) inquiry into the energy market.

2.2 The audit criteria and methodology

In 2013, a working party consisting of members of staff from Citizens Advice, Energy UK, EDF Energy, SSE and the previous auditors set up a list of audit criteria and scoring weighting. These were designed to quantify Ofgem requirements and best practice in complaints signposting across a range of documents. The criteria were weighted between 2, for less important items, and 10, for the most important items, often Ofgem requirements. All suppliers were scored on all criteria. Half marks were only awarded where there were two parts to a criteria, or a supplier could give partial information, e.g. a base webpage rather than energy specific page or an incorrect terminology, e.g. Citizens Advice rather than Citizens Advice consumer service. The domestic audit criteria can be found in Appendix A.

Each iteration of the audit has attempted to include all domestic energy suppliers, excluding white-label sites,⁶ as their complaints are included within the main brand.

For the first time, we also extended the audit to non-domestic suppliers. We used a slightly edited version of the audit criteria for non-domestic criteria, dropping requirements that were not relevant (for example, references to the 'Know Your Rights' document). These differences are explained in Appendix A.

For the audit, suppliers were asked to provide as many of the following documents as they had available:

- Bill for quarterly cash/cheque (QCC) customers
- Statement of account for direct debit (DD) customers
- Statement of account for pre-payment meter (PPM) customers
- Annual statement (domestic suppliers only)
- Unilateral contract variation notice
- Energy supply contract
- Complaint handling leaflet/booklet

In addition, this year we asked suppliers to provide the following documents:

- 8 week letter
- Deadlock letter

⁶ For example, Sainsbury's Energy

Many suppliers did not submit documents for all categories. There are valid reasons why supplier cannot provide these documents, primarily:

- They do not supply those kinds of customers
- They have not yet reached a milestone where they need to develop such documents

Where such a reason was given, the suppliers were marked as not available (n/a). If suppliers failed to provide a document without a valid reason, they were marked as not suppliers (n/s). These were included in the ranking, although not given a score.

Some suppliers have also provided feedback to us about the appropriateness of particular audit criteria, suggesting that they fulfil the spirit of the criteria, if not the letter. We will be taking this feedback into account if we run future versions of this audit.

We note that some suppliers may have made changes to their bills and statements since they were requested and audited (in June 2016) and to their websites (which were reviewed in October 2016). This report, therefore, reflects a snapshot of suppliers' bills, statements and websites at the point of audit.

2.3 This report

This report provides a detailed comparative breakdown of suppliers scoring against the criteria. The next section (Section 3) provides a high-level snapshot of the audit findings, in the form of a series of tables summarising suppliers' performance. The subsequent sections provide the detailed findings for domestic suppliers (Section 4) and non-domestic suppliers (Section 5).

3. Audit findings: At a glance

This section presents seven key tables, summarising suppliers' performance at a glance. These tables summarise:

- Raw scores and rankings for each domestic supplier and change in performance for domestic suppliers who participated in the 2014 audit
- Raw scores and rankings for each non-domestic supplier

3.1. Domestic suppliers

This section provides the overall summary information for domestic suppliers. 28 domestic suppliers were audited. A further 10 did not respond to the Information Request. The suppliers who did not respond to the Information Request are:

- Avro Energy
- Ebico
- Flow Energy
- Green Star Energy
- Iresa
- Isupply Energy
- Daligas
- GB Energy Supply (now no longer trading)
- GnErgy
- Green Energy UK

Table 3.1.1 shows the summary of the range and average scores for each audit category, when compared to 2014. Care must be taken with interpretation, as some suppliers were part of the 2014 audit and not the 2016 audit and vice versa.

Overall, average performance has improved. However, it has not improved *significantly*, with the largest increase in performance being for PPM bills, which has enjoyed a 14 percentage point increase. In contrast, QCC bills have only increased by one percentage point.

Table 3.1.1: Domestic suppliers scores summary

Category	Year	Out of	Highest Score	Lowest Score	Average (%)
Website	2016	131	129	40	77%
	2014		124	54	69%
Bill for QCC customer	2016	70	70	25	77%
	2014		70	17	76%
Statement of account for DD customer	2016	70	70	25	78%
	2014		70	15	70%

Statement of account for PPM customer	2016		70	10	76%
	2014	70	70	5	62%
Annual statement	2016		26	7	83%
	2014	26	26	14	80%
Notification of unilateral contract variation	2016	27	27	0	81%
	2014	29	29	0	67%
Energy supply contract	2016		75	0	59%
	2014	75	75	0	42%
Complaint handling leaflet/booklet	2016		61	17	80%
	2014	61	61	17	72%
8 week letter	2016	27	27	22	98%
Deadlock letter	2016	27	27	22	97%

Table 3.1.2 provides an overall summary of suppliers' domestic scores against each category. Some suppliers did not provide certain categories of document (for example, some new suppliers had not had the need to change consumers' contracts) and these are marked n/a. Where suppliers did not supply a document, it is marked n/s.

Table 3.1.2: Domestic suppliers' scores

	Website	QCC Bill	DD Bill	PPM Bill	Annual statement	Unilateral contract variation	Supply contract	Complaints leaflet	8 week letter	Deadlock letter
Max score	131	70	70	70	26	27	75	61	27	27
Better Energy	75	27	27	27	14	n/a	0	36	n/a	n/a
Bristol Energy	114	51	51	n/a	n/a	n/a	68	52	22	22
British Gas	121	70	70	70	26	n/a	62	61	27	27
Bulb	111	n/a	55	n/a	n/a	n/a	63	n/a	27	27
Cardiff Energy Supply Limited	116	n/a	n/a	n/a	n/a	n/a	10	n/a	n/a	n/a
Co-operative Energy	87	46	46	10	14	10	51	42	27	27
Economy Energy	124	63	63	63	14	n/a	10	42	27	27
Ecotricity	109	60	60	60	26	n/a	15	61	n/a	27
EDF Energy	121	70	70	70	26	27	75	61	27	27
E.ON	106	70	70	70	21	27	75	61	27	27
E Gas and Electric	102	n/a	n/a	n/s	26	27	22	44	27	27
Extra Energy	70	36	36	n/a	19	n/a	56	51	27	27
First Utility	74	70	70	70	26	n/s	75	n/s	27	27
Go Effortless	40	n/a	56	n/a	24	n/a	56	17	22	22
Good Energy	92	44	44	n/a	21	0	0	59	27	27
LoCO2	126	65	65	65	26	27	37	56	27	27
npower	129	55	55	55	26	15	48	42	27	27

Octopus Energy	99	n/a	65	n/a	n/a	n/a	75	n/s	27	27
OVO Energy	62	55	55	n/a	24	27	48	17	27	27
Places for People Energy	52	53	53	n/a	n/a	n/a	n/s	n/s	22	22
Robin Hood Energy	121	55	55	55	7	17	5	44	n/a	22
Scottish Power	99	56	56	56	26	25	53	47	27	27
So Energy	106	32	32	n/a	22	22	30	54	27	27
Spark Energy	124	25	25	15	14	n/a	41	n/s	27	27
SSE	109	63	63	63	26	27	70	61	27	27
Utilita	114	53	53	53	16	22	20	54	27	27
Utility Warehouse	107	65	n/a	n/a	26	27	65	61	27	27
Zog	126	n/a	65	n/a	26	27	70	56	27	27

Table 3.1.3 provides the ranking for each supplier against each audit document, excluding the 8 week and deadlock letter section, where only four suppliers scored less than the maximum available (further details are available in section 4.7 on these parts of the audit). Table 3.1.3 is organised in descending order of the number of suppliers who submitted a particular document.

No suppliers consistently comes first or second across the categories. However, British Gas, EDF Energy, E.ON, SSE, LoCO2, Zog and Scottish Power are regularly in the top five performers. In contrast, Places for People Energy and Spark Energy (apart from website) regularly score near the bottom.

Table 3.1.3: Rankings for each domestic supplier

#	Website	Supply contract	DD Bill	QCC Bill	Complaints leaflet	PPM Bill	Annual statement	Unilateral contract variation
1	npower	EDF, E.ON, First Utility, Octopus Energy	British Gas, EDF, E.ON, First Utility	British Gas, EDF, E.ON, First Utility	British Gas, Ecotricity, EDF, E.ON, SSE, Utility Warehouse	British Gas, EDF, E.On, First Utility	British Gas, Ecotricity, EDF, E Gas and Electric, First Utility, LoCO2, nPower, Scottish Power, SSE, UtilityWarehouse, Zog	EDF, E.ON, E Gas and Electric, LoCO2, OVO Energy, SSE, Utility Warehouse, Zog
2	LoCO2, Zog	SSE, Zog	LoCO2, Octopus Energy, Zog	LoCO2, Utility Warehouse	Good Energy	LoCO2	Go Effortless, OVO Energy	Scottish Power
3	Economy Energy, Spark Energy	Bristol Energy	Economy Energy, SSE	Economy Energy, SSE	LoCO2, Zog	Economy Energy, SSE	So Energy	So Energy, Utilita

4	British Gas, EDF, Robin Hood Energy	Utility Warehouse	Ecotricity	Ecotricity	So Energy, Utilita	Ecotricity	E.ON, Good Energy	Robin Hood Energy
5	Cardiff Energy Supply Limited	Bulb	Go Effortless, Scottish Power	Scottish Power	Bristol Energy	Scottish Power	Extra Energy	npower
6	Bristol Energy	British Gas	Bulb, npower, OVO Energy, Robin Hood Energy	npower, OVO Energy, Robin Hood Energy	Extra Energy	npower, Robin Hood Energy	Utilita	Co-operative Energy
7	Utilita	Extra Energy, Go Effortless	Places for People Energy, Utilita	Places for People Energy	Scottish Power	Utilita	Better Energy, Co-operative Energy, Economy Energy, Spark Energy	Good Energy
8	Bulb	Scottish Power	Utilita	Utilita	E Gas and Electric, Robin Hood Energy	Better Energy	Robin Hood Energy	First Utility (n/s)
9	Ecotricity	Co-operative Energy	Bristol Energy	Bristol Energy	15= Robin Hood Energy	Spark Energy		
10	SSE	npower, OVO Energy	Co-operative Energy	Co-operative Energy	Co-operative Energy	Co-operative Energy		
11	Utility Warehouse	Spark Energy	Good Energy	Good Energy	Economy Energy, nPower	E Gas and Electric (n/s)		
12	E.ON	LoCO2	Extra Energy	Extra Energy	Better Energy			
13	So Energy	So Energy	So Energy	So Energy	Go Effortless, OVO Energy			
14	E Gas and Electric	E Gas and Electric	Better Energy	Better Energy	First Utility (n/s), Octopus Energy (n/s), Places for People Energy (n/s), Spark Energy (n/s)			
15	Octopus Energy, Scottish Power	Utilita	Spark Energy	Spark Energy				
16	Scottish Power	Ecotricity						
17	Good Energy	Cardiff Energy Supply Limited,						

		Economy Energy						
18	Co-operative Energy	Economy Energy						
19	Better Energy	Robin Hood Energy						
20	First Utility	Better Energy, Good Energy						
21	Extra Energy	Places for People Energy (n/s)						
22	OVO Energy							
23	Places for People Energy							
24	Go Effortless							

Table 3.1.4 presents an overview of where domestic suppliers have improved or declined in performance since 2014. It only applies to suppliers who participated in both the 2014 and 2016 audit. Overall, the picture is one of steady improvement, with some concerning dips in performance for some suppliers. Disappointingly, the only suppliers who make improvements/maintain their scores across the board are British Gas, EDF Energy, LoCO2, E.On and Utility Warehouse.

These findings are discussed in more detail in subsequent sections.

Table 3.1.4: Change in score for domestic suppliers (2014-2016)

	Website	QCC Bill	DD Bill	PPM Bill	Annual statement	Unilateral contract variation	Supply contract	Complaint leaflet
British Gas	+	=	=	=	+	n/a in 2016	+	=
CoOp	+	-	-	-	-	-	+	+
Economy Energy	+	n/a in 2014	n/a in 2014	+	-	n/a in 2016	n/a in 2014	+
Ecotricity	+	-	-	-	=	n/a in 2016	+	+
EDF Energy	=	=	=	=	=	=	=	=
EOn	+	+	+	+	=	+	+	+
First Utility	-	+	+	+	=	n/s in 2016	+	n/s in 2016
Good Energy	+	+	+	n/a in 2016	+	n/a in 2014	-	+
LoCo2	+	=	=	n/a in 2014	=	=	=	=
nPower	+	+	+	+	+	-	-	=
OVO	-	n/a in 2014	+	n/a in 2016	n/a in 2014	+	+	=

Scottish Power	-	-	-	-	+	=	-	-
Spark Energy	+	=	=	-	-	n/a in 2016	+	n/s in 2016
SSE	-	-	-	+	+	+	+	+
Utilita	+	+	+	+	-	+	=	+
Utility Warehouse	+	=	n/a in 2016	n/a in 2016	n/a in 2014	=	=	=

3.2 Non-domestic suppliers

This section provides the overall summary information for non-domestic suppliers. 27 domestic suppliers were audited. A further 14 (including four already mentioned for not responding to the domestic Information Request) did not respond to the Information Request. The suppliers who did not respond to the Information Request are:

- Corona Energy
- Crown Energy
- D Energi
- Enterprise Gas
- Gazprom
- Hudson Energy
- Regent Gas
- Tempus Energy (now no longer supplying customers)
- Yu Energy
- Daligas
- GB Energy Supply (now no longer trading)
- GnErgy
- Green Energy UK

Table 3.2.1 shows the summary of the range and average scores for each audit category.

Overall, average performance is significantly worse than for domestic suppliers. Many suppliers score zero on whole categories - for unilateral contract variation, every supplier scores zero (it should be noted that this is not a required document for non domestic suppliers).

In contrast, performance for 8 week letters and deadlock letters is comparable to domestic suppliers, suggesting that if non-domestic suppliers simply extended their practices to other categories, significant improvements could be achieved.

Table 3.2.1 Non domestic suppliers' score summary

	Out of	Highest Score	Lowest Score	Average (%)
Website	126	121	0	59%
Bill for QCC customer	68	63	0	41%
Statement of account for DD customer	68	63	0	33%
Statement of account for PPM customer	68	63	0	56%
Notification of unilateral contract variation	25	0	0	0%
Energy supply contract	73	56	0	12%

Complaint handling leaflet/booklet	59	59	12	68%
8 week letter	27	27	20	95%
Deadlock letter	27	27	22	96%

Table 3.2.2 provides an overall summary of suppliers' non-domestic scores against each category. Some suppliers did not provide certain categories of document (for example, some new suppliers had not had the need to change consumers' contracts) and these are marked n/a. Where suppliers did not supply a document, it is marked n/s.

Table 3.2.2: Non-domestic suppliers' scores

	Website	QCC Bill	DD Bill	PPM Bill	Unilateral contract variation	Supply contract	Complaints leaflet	8 week letter	Deadlock letter
Axis Telecom	0	15	n/a	n/a	n/a	0	17	22	22
BES Utilities	67	n/a	0	n/a	n/a	5	47	27	27
Better Energy	70	0	0	n/a	n/a	0	34	n/a	n/a
British Gas	97	46	46	n/a	n/a	47	57	27	27
CNG	111	51	n/a	n/a	n/a	0	42	27	27
Dong Energy	70	10	0	n/a	n/a	5	27	22	22
Dual Energy	102	24	24	n/a	n/s	0	12	n/s	27
Ecotricity	104	29	29	n/a	n/a	15	59	n/a	27
EDF SME	121	51	51	51	0	44	59	27	27
Engie	35	29	29	n/a	n/s	0	17	22	22
E.ON	67	63	63	63	0	0	59	27	27
Extra Energy	50	41	41	n/a	n/s	44	49	27	27
Go Effortless	35	0	n/a	n/a	n/a	56	17	22	22
Good Energy	92	44	44	n/a	0	0	59	27	27
Haven Power	106	n/a	0	n/a	0	0	22	27	27
LoCO2	121	0	0	n/a	0	0	54	n/a	27
MA Energy	20	n/a	29	n/a	0	0	42	n/a	27
National Gas	121	0	n/a	n/a	n/a	0	59	20	27
npower	45	43	53	n/a	n/s	5	42	27	27
Opus	52	19	0	n/a	0	0	37	27	27
OVO Energy	62	0	0	n/a	n/a	0	17	27	27
Scottish Power	89	19	19	0	0	0	47	27	27
SSE	121	46	46	n/a	0	0	57	27	27
Total GP	107	25	25	n/a	n/s	5	39	27	27
United Gas and Power	107	n/a	0	n/a	n/a	0	17	22	22
Utility Warehouse	40	63	n/a	n/a	n/a	5	59	27	27
Yorkshire Gas and Power	0	n/a	0	n/a	0	0	n/s	27	27

Table 3.2.3 provides the ranking for each supplier against each audit document, excluding:

- the 8 week and deadlock letter section, where few suppliers scored less than the maximum/near maximum available (further details are available in section 5.6 on these parts of the audit).
- The notification of unilateral contract variation, where all non-domestic suppliers either scored zero, did not supply the document or did not produce such a document for their customers.

It is organised in descending order of the number of suppliers who submitted a particular document.

No supplier consistently comes first or second across the categories. However, EDF SME and British Gas regularly appear in the top five performers. In contrast, Scottish Power, Yorkshire Gas and Power and Axis Telecoms regularly score near the bottom.

Table 3.2.3: Rankings for each non-domestic supplier

#	Website	Complaints leaflet	QCC Bill	DD Bill	Supply contract	PPM Bill
1	EDF SME, LoCO2, National Gas, SSE	Ecotricity, EDF SME, E.ON, Good Energy, National Gas, Utility Warehouse	E.ON, Utility Warehouse	E.ON	Go Effortless	E.ON
2	CNG	British Gas, SSE	CNG, EDF SME	npower	British Gas	EDF SME
3	Total GP, United Gas and Power	LoCO2	British Gas, SSE	EDF SME	EDF SME	Scottish Power
4	Haven Power	Extra Energy	Good Energy	British Gas, SSE	Extra Energy	
5	Ecotricity	BES Utilities, Scottish Power	npower	Good Energy	Ecotricity	
6	Dual Energy	CNG, MA Energy, npower	Extra Energy	Extra Energy	BES Utilities, Dong Energy, nPower, Total GP, Utility Warehouse	
7	British Gas	Total GP	Ecotricity, Engie	Ecotricity, Engie, MA Energy	Axis Telecom, Better Energy, CNG, Dual Energy, Engie, E.ON, Good Energy, Haven Power, LoCO2, MA Energy, National Gas, Opus, OVO Energy, Scottish Power, SSE, United Gas and Power, Yorkshire Gas and Power	
8	Good Energy	Opus	Total GP	Total GP		
9	Scottish Power	Better Energy	Dual Energy	Dual Energy		

10	Better Energy, Dong Energy	Dong Energy	Opus, Scottish Power	Scottish Power		
11	BES Utilities, E.ON	Haven Power	Axis Telecom	BES Utilities, Better Energy, Dong Energy, Haven Power, LoCO2, Opus, OVO Energy, United Gas and Power, Yorkshire Gas and Power		
12	OVO Energy	Axis Telecom, Engie, Go Effortless, OVO Energy, United Gas and Power	Dong Energy			
13	Opus	Dual Energy	Better Energy, Go Effortless, LoCO2, National Gas, OVO Energy			
14	Extra Energy	Yorkshire Gas and Power (n/s)				
15	npower					
16	Utility Warehouse					
17	Engie, Go Effortless					
18	MA Energy					
19	Axis Telecom, Yorkshire Gas and Power					

4. The findings in detail: domestic suppliers

4.1 Websites

Having clear and accessible information on websites about how to make a complaint is an important part of ensuring that consumers are treated fairly by energy suppliers. Complaints signposting on suppliers' websites is therefore a critical part of this audit.

The domestic supplier website audit was conducted on company websites as they appeared in October 2016. In this section, we detail suppliers' overall scores on this part of the audit, the improvement/decline in scores since the 2014 audit (for companies that participated in that audit) and an overview of the key scoring criteria.

Ofgem regulations state that, in order to be compliant, a supplier must ensure that their complaints handling procedure appears on a clear and prominent location on their website. A full list of the audit criteria used to quantify this requirement is given in Appendix A.

4.1.1 Overall scores for websites

A total of 131 points were available for websites. Table 4.1.1 shows the range and average of scores in 2016 compared to the 2014 audit.

Table 4.1.1 Summary of scores in 2014 and 2016

Year	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
2016	131	129	40	77%	78%
2014		124	54	69%	69%

2016 saw an increased range when compared to 2014, with both a slightly higher highest score and a lower lowest score. This is explained by the scores of two new suppliers, Places for People Energy and Go Effortless, who have lower scores than the lowest scorers in 2014. There has been an overall increase of just under 10% in the average and median scores since 2014.

Table 4.1.2 lists the overall scores achieved by each supplier with the ranking out of the 28 suppliers audited in 2016. For those suppliers included in the 2014 audit, Table 4.2 also provides a record of whether their scores had increased or decreased since the 2014 audit.

Table 4.1.2: Ranking of suppliers (websites)

	Position	Score	Change in Score since 2014
npower	1	129	+
Zog	2=	126	
LoCO2	2=	126	+
Spark Energy	4=	124	+
Economy Energy	4=	124	+
EDF Energy	6=	121	same score
British Gas	6=	121	+
Robin Hood Energy	6=	121	
Cardiff Energy Supply Limited	9	116	
Bristol Energy	10=	114	
Utilita	10=	114	+
Bulb	12	111	
SSE	13=	109	-
Ecotricity	13=	109	+
Utility Warehouse	15	107	+
E.ON	16=	106	+
So Energy	16=	106	
E Gas and Electric	18	102	
Octopus Energy	19=	99	
Scottish Power	19=	99	-
Good Energy	21	92	+
Co-operative Energy	22	87	+
Better Energy	23	75	
First Utility	24	74	-
Extra Energy	25	70	
OVO Energy	26	62	-
Places for People Energy	27	52	
Go Effortless	28	40	

11 of the 15 suppliers audited in 2014 have improved or maintained their score, while 4 suppliers have seen their score decrease. Of these, four suppliers: npower, LoCO2, Economy Energy and Co-operative Energy have improved their score by over 30%. This is mainly due to moving complaints data closer to the homepage and improving the description and links to Citizens Advice Consumer Service. On the other hand, First Utility has moved complaints information deeper into their website and not updated contact details, resulting in a reduction of almost 50% in their score. Scottish Power and SSE have also reduced their scores by 17%, while OVO Energy's score is marginally lower. 17 of the 27 suppliers audited in 2016 have scores in excess of 100.

4.1.2 Overall performance on specific website scoring criteria

Table 4.1.3 below provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016 and in 2014, sorted from highest to lowest proportion. Care should be taken in interpreting changes, given the audited suppliers are to some extent different in 2016 when compared to 2014.

Nearly 100% of suppliers have a dedicated complaints page and almost all suppliers include details of Ombudsman Services: Energy and the Citizens Advice consumer service. The one exception is E Gas and Electric.

Overall, there has been improvement in 15 of 24 categories and overall performance has slid in 9 categories (which is overwhelmingly explained by new suppliers). The worst performing category is the word 'complaints' appearing without moving the cursor on suppliers' home pages, with only 7% of suppliers fulfilling this criteria, down from 20% in 2014.

The most improved categories are there being a link to the Citizens Advice consumer service on the complaints page and up-to-date phone number, both of which have improved by 59%, indicating that suppliers' are succeeding in updating their websites to reflect how this service's advertising and identity has changed.

Table 4.1.3: Performance by scoring criteria

Criteria	2016 % of compliant suppliers	2014 % of compliant suppliers
Your website should have a dedicated complaints page (5)	96%	100%
Details of Ombudsman Services: Energy should be located on dedicated complaints page (5)	93%	95%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	93%	80%
Citizens Advice consumer service should be 2 clicks or less from the home page (1 click/two clicks) (10)	93% (54/39)	95% (50/45)
The steps involved in your complaints procedure should be outlined on your complaints page and include Ombudsman Services: Energy details (5)	89%	100%
Your website should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506). (Half marks given for mention of Citizens Advice) (10)	89% (4%)	30%
There should be a link to Citizen Advice consumer service on the webpage. (5)	89%	30%
Your complaints procedure should be described on your website as opposed to a PDF document (5)	86%	85%
Ombudsman Services:Energy should be 2 clicks or less from the home page (1 click/two clicks) (10)	86% (43/43)	85% (45/40)
There should be a link to the 'Know Your Rights' PDF (the most up to date version) within the Citizens Advice consumer service description. (5)	82%	30%
Your website should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624). (Half marks given for either website or phone number correct) (10)	82% (11%)	50%
Your website should include a link to the website of the Ombudsman Services: https://www.ombudsman-services.org/energy . (5)	82%	75%
There should be 2 or fewer 'page downs' hit to see Ombudsman Services: Energy details on your complaints page (5)	79%	85%

Your website should include a link to the Ombudsman Services: Energy email - enquiries@os-energy.org (2)	79%	55%
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process. (5)	75%	55%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	75%	70%
There should be 2 or fewer 'page downs' hit to see Citizens Advice Consumer Service details on your complaints page (5)	68%	80%
Citizens Advice Consumer Service should be mentioned before Ombudsman Services: Energy (2)	61%	50%
The word 'complaint' should appear on the home (<i>without/with moving the cursor</i>) (10)	61% (54/7)	55% (35/20)
When a customer enters the word 'complaint' into your website's search function, they should be taken directly to the complaints page (5)	57%	35%
Details of Citizens Advice Consumer Service should be located on dedicated complaints page. (<i>Half marks given for reference to Citizens Advice on the complaints page</i>) (10)	57% (25%)	90%
There should be a link to Citizen Advice consumer service online webform on the on the webpage: https://forms.adviceguide.org.uk/complaint_energy.aspx (2)	50%	30%

4.1.3 Performance on key website criteria

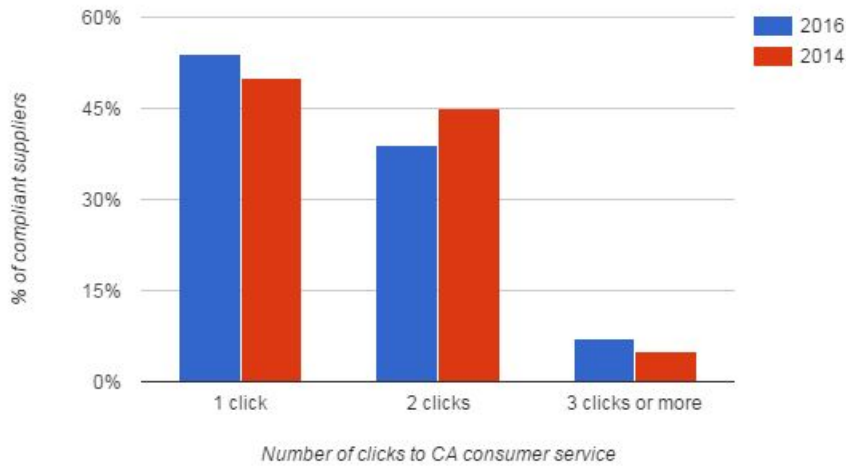
The scoring criteria awarded a higher number of points for website features that we consider particularly important. These are:

- Number of clicks from the home page to the Citizens Advice consumer service and Ombudsman Services: Energy (two or fewer was deemed acceptable)
- Whether the word 'complaint/s' appears on the home page without moving the cursor
- Details of the Ombudsman Services:Energy located in the complaints section
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy

Clicks to consumer service and OS:E

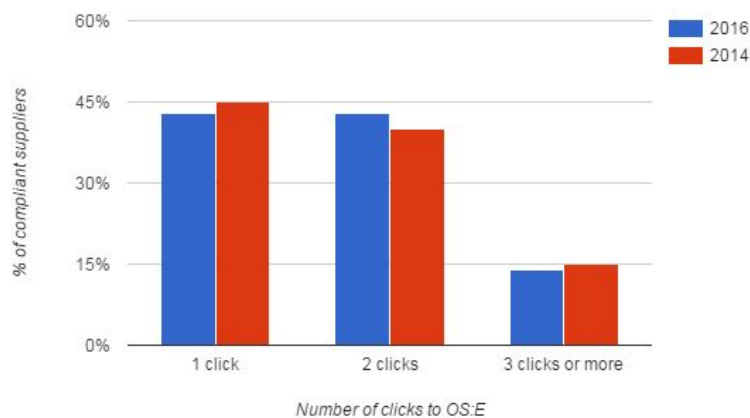
Ideally, the Citizens Advice consumer service should be one click away from the supplier's home page but partial marks were available for 2 clicks. In 2016, there has been a slight decrease in the proportion of suppliers fulfilling this criteria, from 95% to 93%. However, Figure 4.1.1 shows that the number of suppliers with Citizens Advice consumer service 1 click from the home page has increased, while the number with the consumer service 2 clicks from the home page has decreased.

Figure 4.1.1. Number of clicks from the home page to reach the Citizens Advice consumer service



The Ombudsman Services: Energy service also should be 1-2 clicks away from the supplier’s home page, where there has been a very slight improvement from 85% in 2014 to 86% in 2016. However, this has been comprised of an increase in suppliers having the OS:E 2 clicks from their home page, while the number of suppliers with only 1 click from their home page to the OS:E has decreased as shown in Figure 4.1.2.

Figure 4.1.2 Number of clicks from the home page to reach Ombudsman Services: Energy



Prominence of the word 'complaints'

Our scoring criteria require suppliers to have the word 'complaint' visible on the homepage of their website, ideally without moving the cursor. There has been some improvement since 2014 on this criteria, improving from 55% in 2014 to 61% in 2016. However, 39% of suppliers still have progress to make in this area.

Ombudsman Services: Energy on complaints page

In 2014, all suppliers had dedicated complaints pages and only LoCO2 did not signpost to the OS:E on this page. In 2016, one supplier did not have a dedicated complaints page (E Gas and Electric) and two did not signpost to the OS:E (Go Effortless and OVO Energy).

Contact details for Citizens Advice consumer service and OS:E

Our scoring criteria required suppliers to give full contact details (website and telephone number) for both organisations on their websites. In 2014, only 30% of suppliers fulfilled this for the Citizens Advice consumer service; by 2016, this had improved to 89%. Similarly, in 2014 only 50% of suppliers had the full contact details for the Ombudsman Services: Energy; by 2016, this had similarly improved to 89%.

Several suppliers only received half marks for this criteria, as some had included out of date contact details such as our old website (adviceguide.org.uk) or phone numbers. We have requested that suppliers update this information urgently. It is important that the industry ensures that all contact details given on websites and all other documentation are both consistent and correct.

4.1.4 Areas for significant improvement

There has been improvement across many website scoring criteria in the past two years. However, there remain some areas in which there is still a lot of scope for some suppliers to improve on their scores, most notably the following (where the criteria is met by less than 60% of suppliers):

- A link to Citizens Advice consumer service online webform on the webpage (only fulfilled by 50% of suppliers, versus 30% in 2014)
- Customers should be taken to the complaints webpage when they search for it (only fulfilled by 57% of suppliers, versus 35% in 2014)
- The Citizens Advice consumer service should be located on the dedicated complaints page (only fulfilled by 57% of suppliers, versus 90% in 2014; this could be due to a slight change in scoring methodology, where we only award full marks for mentioning the 'Citizens Advice consumer service')

4.2 Bills and statements

Bills and statements are the primary means of interaction between suppliers and consumers. Complaints signposting on suppliers' bills and statements is therefore a critical part of this audit.

In this section, we detail suppliers' overall scores on this part of the audit, the improvement/decline in scores since the 2014 audit (for companies that participated in that audit) and an overview of the key scoring criteria.

Suppliers were asked to send examples of bills for quarterly cash/cheque (QCC) customers, direct debit (DD) customers and pre-payment meter (PPM) customers. The following numbers of documents were received for audit:

Table 4.2.1 Number of bills and statements received

	2014	2016
QCC Bills	16	22
DD Statements	18	25
PPM Statements	14	16

All suppliers provided sufficient justification for their lack of documentation with one exception of E Gas and Electric's statement of account for PPM customers.

4.2.1 Overall scores for bills and statements

Table 4.2.2 shows an overview of the scores for all bills and statements.

Table 4.2.2 Summary of scores in 2014 and 2016

		Out of	Highest Score	Lowest Score	Average (%)	Median (%)
Bill for QCC customer	2016	70	70	25	77%	79%
	2014		70	17	76%	83%
Statement of account for dd customer	2016	70	70	25	78%	79%
	2014		70	15	70%	79%
Statement of account for ppm customer	2016	70	70	10	76%	86%
	2014		70	5	62%	71%

Some suppliers achieved full marks in each category in both 2014 and 2016. The lowest score achieved has improved since 2014, and the average and medians have also improved.

Many suppliers use the same template or documentation for all three types of customers. This reflected in Table 4.2.3 which shows a similar scores and ranking across the three bill types.

Table 4.2.3: Ranking of suppliers (bills and statements)

Bill for QCC Customers			Statement of account for DD customers			Statement of account for PPM customer		
Position	Score	Change in Score	Position	Score	Change in Score	Position	Score	Change in Score
1= EDF Energy	70	same score	1= EDF Energy	70	same score	1= EDF Energy	70	same score
1= British Gas	70	same score	1= British Gas	70	same score	1= British Gas	70	same score
1= First Utility	70	+	1= First Utility	70	+	1= First Utility	70	+
1= E.ON	70	+	1= E.ON	70	+	1= E.ON	70	+
5= LoCO2	65	same score	5= LoCO2	65	same score	5= LoCO2	65	n/a in 2014
5= Utility Warehouse	65	same score	5=. Zog	65		6= SSE	63	+
7= SSE	63	-	5=. Octopus Energy	65		6= Economy Energy	63	+
7= Economy Energy	63	n/a in 2014	8= SSE	63	-	8. Ecotricity	60	-
9. Ecotricity	60	-	8= Economy Energy	63	n/a in 2014	9. Scottish Power	56	-
10. Scottish Power	56	-	10. Ecotricity	60	-	10= npower	55	+
11= npower	55	+	11= Scottish Power	56	-	10= Robin Hood Energy	55	
11= OVO Energy	55	n/a in 2014	11= Go Effortless	56		12. Utilita	53	+
11= Robin Hood Energy	55		13= npower	55	+	13. Better Energy	27	
14= Utilita	53	+	13= OVO Energy	55	+	14. Spark Energy	15	-
14= Places for People Energy	53		13= Robin Hood Energy	55		15. Co-operative Energy	10	-
16. Bristol Energy	51		13. Bulb	55				
17. Co-operative Energy	46	-	17. Utilita	53	+			
18. Good Energy	44	+	17. Places for People Energy	53				
19. Extra Energy	36		19. Bristol Energy	51				
20. So Energy	32		20. Co-operative Energy	46	-			
21. Better Energy	27		21. Good Energy	44	+			
22. Spark Energy	25	same score	22. Extra Energy	36				

	23. So Energy	32		
	24. Better Energy	27		
	25. Spark Energy	25	same score	

The decreases recorded in scores are all relatively small (<10% change in score). Eight suppliers have recorded an increase which were mostly of larger magnitude. While npower recorded a less than 5% increase, E.ON, Utilita, First Utility, Good Energy improved their scores across all bills and statements by 17%, 21%, 47% and 61% respectively. SSE has also recorded a significant improvement in PPM statement scores to bring this into line with their other types of documentation. New suppliers have generally achieved lower scores and ranking than established suppliers. The exceptions to this are Zog, Octopus Energy and Robin Hood Energy who are the only new entrants to make the top 10 ranking in any category.

4.2.2 Overall performance on bills and statements scoring criteria

Table 4.2.4 shows the percentage of suppliers who fulfilled all criteria for the bills and statements. There have only been 9 instances, against 5 criteria, where the percentage of suppliers who met it have decreased since 2014. All of these are by less than 6%. The most significant improvement has been in the PPM statements category.

Table 4.2.4 Performance by scoring criteria

% of suppliers who met this criteria	QCC		DD		PPM	
	2016	2014	2016	2014	2016	2014
Citizens Advice Consumer Service should be mentioned. (Half marks given for mention of Citizens Advice) (10)	95% (5%)	100%	96% (4%)	100%	87% (13%)	93%
Ombudsman Services: Energy should be mentioned. (Half marks given for mention of Ombudsman Services) (10)	82% (5%)	75%	84% (4%)	78%	73% (7%)	64%
There should be a dedicated complaints section. (5)	82%	81%	80%	83%	73%	71%
Ombudsman Services: Energy should be located in the dedicated complaints section. (2)	82%	69%	84%	72%	80%	57%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	82%	69%	84%	78%	80%	57%
Both organisations should be given the same prominence. (2)	77%	75%	80%	78%	67%	64%
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description. (2)	77%	81%	80%	83%	87%	79%
The bill should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number	73% (18%)	56%	72% (20%)	44%	80% (20%)	43%

(03454 040506). (Half marks given for having either the website or phone number correct) (10)						
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy. (2)	68%	63%	68%	61%	80%	50%
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy. (2)	68%	56%	68%	56%	60%	43%
Your bill should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624). (Half marks given for having either the website or phone number correct) (10)	64% (14%)	50%	56% (20%)	50%	67% (13%)	36%
Citizens Advice consumer service should be mentioned in the dedicated complaints section. (5)	59%	63%	64%	61%	60%	57%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	36%	31%	44%	44%	40%	43%

4.2.3 Performance on key bills and statements criteria

Inclusion of Citizens Advice Consumer Service

Suppliers must inform customers that Citizens Advice consumer service can help in providing information and advice to be compliant with Ofgem regulations.

In 2014, all but one supplier (Economy Energy) mentioned Citizens Advice consumer service on all types of bill and statement. In 2016, all bills and statements provided by Spark Energy and Co-operative Energy's PPM statement referred only to the Citizens Advice, rather than Citizens Advice consumer service. As these services can be accessed differently, and the consumer service can provide faster, more targeted advice, we have only awarded these suppliers half marks for this audit criteria.

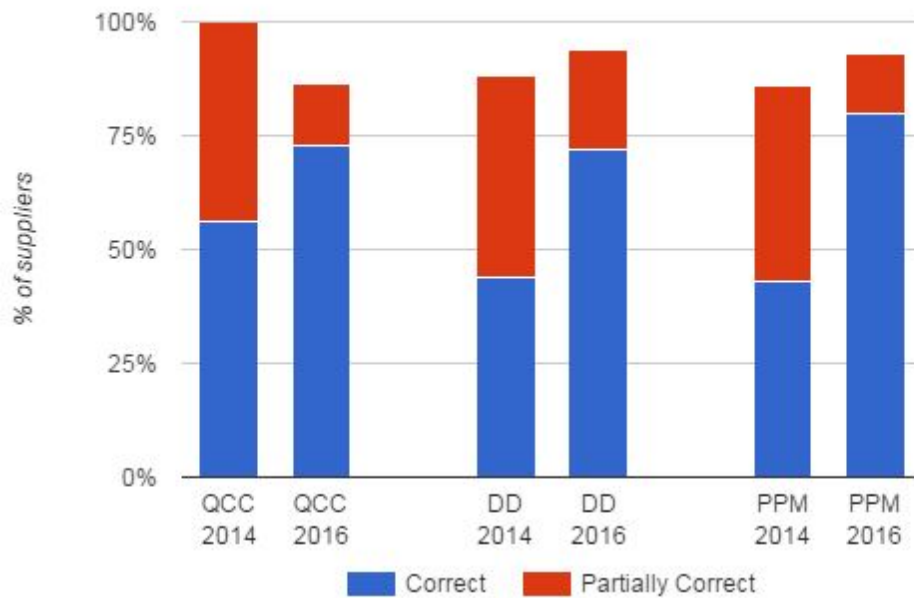
However, the follow on criteria, that Citizens Advice consumer service should be described as free and independent/impartial, was not met by another three suppliers (Bristol Energy, So Energy, Utilita) across their bills and statements portfolio.

Provision of correct Citizens Advice consumer service contact details

Contact details for the Citizens Advice consumer service were given by all suppliers in 2014 on the QCC bill and 88% of suppliers in PPM and DD statements. In 2016, 86% - 94% of suppliers provided some contact details on their bills and statements.

However, a material proportion of these included partially correct information, that is with only a website or telephone number, or with one of these out of date. The proportion of suppliers with both website and telephone number correct has increased significantly in 2016 as shown in Figure 4.2.1.

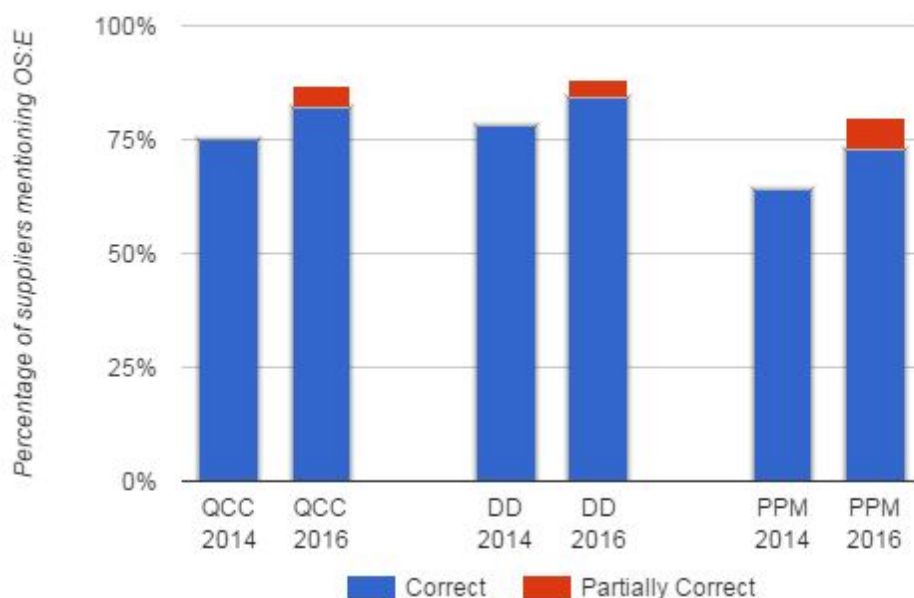
Figure 4.2.1 Citizens Advice consumer service contact details included on bills and statements



Inclusion of Ombudsman Services: Energy

Suppliers were less likely to refer to Ombudsman Services: Energy in their bills and statements despite the importance of the OS:E in complaint resolution. Figure 4.2.2 shows the proportion of suppliers in 2014 and 2016 who mentioned the Ombudsman Services: Energy on their bills and statements. In 2016, suppliers who mentioned Ombudsman Services, rather than Ombudsman Services: Energy were given half marks and marked as partially correct.

Figure 4.2.2: Ombudsman Services: Energy mentioned on bills and statements

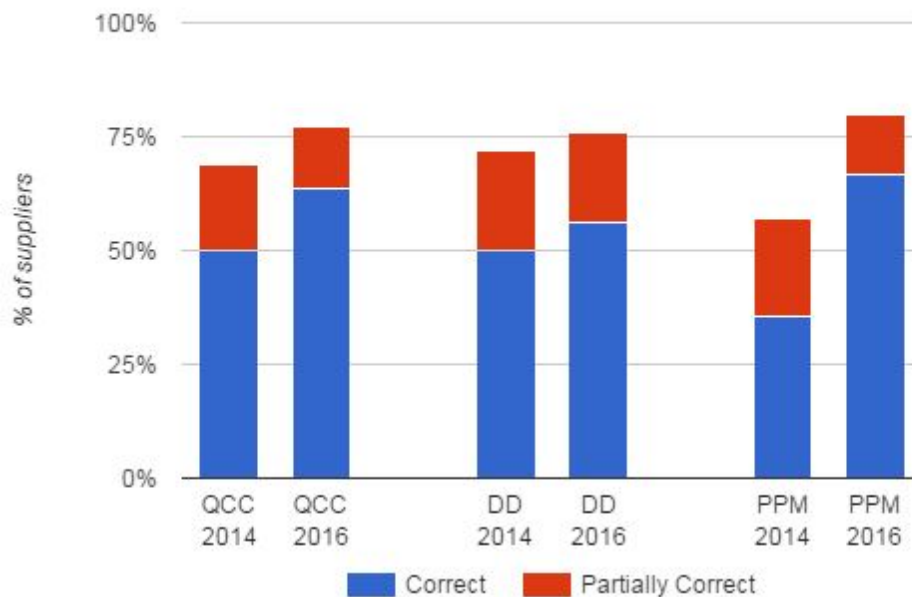


Although still lower than the mention of Citizens Advice consumer service, the proportion of suppliers mentioned the OS:E has improved materially since 2014. The mention of the OS:E is still lower on PPM statements. This is particularly concerning as PPM users are more likely to be in lower socio-economic brackets.

Provision of correct Ombudsman Services: Energy contact details

As with the mention of the service, the proportion of suppliers provided OS:E contact details is lower than Citizens Advice consumer service. There are also material numbers of suppliers providing incorrect or incomplete contact details on their bills. The percentage of suppliers providing correct contact details for the OS:E has risen in all categories. The PPM statements have particularly improved as shown in Figure 4.2.3.

Figure 4.2.3: Correct Ombudsman Services: Energy contact details mentioned on bills and statements



4.2.4 Areas for significant improvement

There has been general improvement in the bills and statements since 2014. However, there is still scope for improvement in the following criteria, which less than 70% of all suppliers met across the bills and statements:

- Ensuring that all key aspects of the Ombudsman Services: Energy are described: that it is free, can be consulted after deadlock/8 weeks, is independent and decisions are binding on the supplier
- Mentioning Citizens Advice consumer service in the dedicated complaints section
- Mentioning Citizens Advice consumer service before the Ombudsman Services: Energy
- Outlining the steps involved in the complaints process and including the Ombudsman Services: Energy

4.3 Annual statements

The annual statement is where a consumer can see their usage for the year, which can lead to questions about costs and usage.

For suppliers to be compliant with Ofgem regulations, they must provide customers with information about where they can obtain impartial advice and information about changing supplier.

23 suppliers submitted documents for audit in 2016, with new suppliers Octopus Energy, Bristol Energy, Bulb, Cardiff Energy Supply Limited and Places for People Energy not yet having issued annual statements to customers yet.

4.3.1 Overall scores for annual statements

There were a total of 26 points available for the annual statement section. Table 4.3.1 shows a summary of scores achieved.

Table 4.3.1: Summary of scores in 2014 and 2016

	Out of	Highest Score	Lowest Score	Average	Median
2016	26	26	7	83%	92%
2014		26	14	79%	81%

The average score has increased a few percentage points from 2014. The median score has increased by over 10% since 2014 with 11 suppliers gaining the maximum points available.

However 2016 has seen an increased range in scores, with a decreased lowest score of 7 from the new supplier Robin Hood Energy, and 4 suppliers having seen reductions in their score since 2014.

It is encouraging to see just under half of the suppliers achieving full marks (11 out of 23). Table 4.3.2 lists the overall scores of each supplier out of the maximum score available (26). For suppliers who had submitted documentation in 2014 their change in score is also reflected in the table.

Table 4.3.2: Ranking of suppliers (annual statement)

	Position	Score	Change in Score since 2014
EDF Energy	1=	26	same score
SSE	1=	26	+
Utility Warehouse	1=	26	n/a in 2014
British Gas	1=	26	+
Ecotricity	1=	26	same score
Zog	1=	26	
LoCO2	1=	26	same score
Scottish Power	1=	26	+
E Gas and Electric	1=	26	
npower	1=	26	+

First Utility	1=	26	same score
OVO Energy	12=	24	n/a in 2014
Go Effortless	12=	24	
So Energy	14	22	
E.ON	15=	21	same score
Good Energy	15=	21	+
Extra Energy	17	19	
Utilita	18	16	-
Co-operative Energy	19=	14	-
Economy Energy	19=	14	-
Better Energy	19=	14	
Spark Energy	19=	14	-
Robin Hood Energy	23	7	

5 of the suppliers had improved their score since 2014, with 5 suppliers maintaining the same score and 4 suppliers having seen their score decrease. There have been 9 suppliers submitting documentation for the first time.

The suppliers seeing a reduction in scores is mainly caused by having outdated contact details on their statements.

4.3.2 Overall performance on specific annual statement scoring criteria

Table 4.3.3 provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016 and in 2014, sorted from highest to lowest proportion. Care should be taken in interpreting changes, given the audited suppliers are to some extent different in 2016 when compared to 2014.

Overall there has been a general increase in the number of suppliers meeting the criteria. With improvement seen in 3 criteria.

The greatest improvement can be seen in the doubling of suppliers who included correct details to the Citizens Advice consumer service, rising 35% in 2016.

There was a reduction in the number of suppliers accurately naming the Citizens Advice consumer service compared to 2014 (only 65%). However, for 2016 we gave half marks if they only mentioned Citizens Advice rather than the consumer service (35%), which accounts for the difference.

Table 4.3.3: Performance by scoring criteria

Criteria	2016 % of suppliers who met this criteria	2014 % of suppliers who met this criteria
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Citizens Advice consumer service should be described as free and independent/impartial. (5)	96%	100%
There should be reference to Ofgem confidence code (2)	83%	82%
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description. (2)	74%	65%
The statement should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number(03454 040506) (Half marks given for either website or phone number being correct). (10)	70% (26%)	35%
Citizens Advice Consumer Service should be mentioned. (Half marks given for mention of Citizens Advice)(10)	65% (35%)	100%

4.3.3 Performance in key annual statement criteria

The scoring criteria awarded higher points to key areas of the annual statements. These are;

- whether the Citizens Advice consumer service was mentioned
- whether the website address and telephone number for the Citizens Advice consumer service were given.

In 2014 all suppliers submitting annual statements for audit mentioned the Citizens Advice consumer service. In 2016 only 65% of the suppliers accurately mentioned the consumer service with a further 35% mentioning only Citizens Advice.

There has been substantial increase the number of suppliers providing contact details for the consumer service from only 35% in 2014 to 96% in 2016. Although, of these only 70% gave the correct up to date details.

4.3.4 Areas for significant improvement

There has been overall improvement in the past 2 years, however there still remains areas for improvement.

- Accurately refer to the Citizens Advice consumer service, with correct updated contact details.
- Include a reference to the 'Know Your Rights' document (74% suppliers included this in 2016 compared with 65% in 2014).
- Refer to the Ofgem Confidence Code (a marginal improvement was seen in 2016 with 83% of suppliers including it, compared to 82% in 2014).

4.4 Notification of unilateral contract variation

Notifications of unilateral contract variation may leave customers questioning why changes have been made to their contract - particularly when this involves a price

increase. Therefore clear signposting to sources of independent advice is important on these documents.

The audit was conducted on 15 notifications submitted in 2016, which was less than the 17 documents submitted in 2014. Below we detail suppliers' overall performance, improvements/declines in scores since 2014 and give an overview of key scoring criteria.

For suppliers to be compliant with Ofgem regulations, they must provide customers with information about where they can obtain impartial advice and information about changing supplier.

4.4.1 Overall scores for notification of unilateral contract variation

A total of 27 points were available for the notification. Table 4.4.1 shows the range and average of scores in 2016 compared to the 2014 audit.

Table 4.4.1 Summary of scores in 2014 and 2016

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
2016	27	27	0	81%	100%
2014	29	29	0	59%	59%

Scores ranged from 27 (full marks) to 0. This year's audit saw a change in the maximum score that could be achieved, dropping from 29 to 27. It was agreed not to score suppliers on whether they refer to the Ofgem Confidence Code, as they are not obliged to do so in notifications of unilateral contract variation. Instead, this information was simply recorded without giving points.

There has been an overall increase of 22 percentage points in the average and 41 percentage points in the median score since 2014 (bearing in mind change in the maximum score that can be achieved making this not a perfect comparison).

Table 4.4.2 lists the overall scores achieved by each supplier with the ranking out of the 15 suppliers audited in this category in 2016. For those suppliers included in the 2014 audit, Table 4.4.2 also provides a record of whether their scores had increased or decreased since the 2014 audit.

Table 4.4.2 Ranking of suppliers (notification of unilateral contract variation)

	Position	Score	Change in Score since 2014
EDF Energy	1	27	same score
SSE	1	27	+
Zog	1	27	
Utility Warehouse	1	27	same score
LoCO2	1	27	same score

E Gas and Electric	1	27	
OVO Energy	1	27	+
E.ON	1	27	+
Scottish Power	9	25	same score
So Energy	10	22	
Utilita	10	22	+
Robin Hood Energy	12	17	
npower	13	15	-
Co-operative Energy	14	10	-
Good Energy	15	0	n/a in 2014
Places for People Energy	n/s	n/s	

Noticeably, 8 suppliers achieved full scores in 2016 and together share first position. This is a marked improvement on the 2014 audit which only saw EDF Energy achieving full points. 8 out of the 10 suppliers also audited in 2014 improved or maintained their score, while 2 suppliers decreased their score. E.On (14th in 2014), Ovo (11th in 2014) and SSE (8th in 2014) greatly improved their positions to now achieving full scores. The greatest improvement in terms of scores between 2014 and 2016 was seen by Utilita, who went from 0 to 22 points. Co-operative Energy and npower both lost 5 points between the two audits.

4.4.2 Overall performance on notification of unilateral contract variation scoring criteria

The following table provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016 and in 2014, sorted from highest to lowest proportion. Half marks (5 instead of 10) were given if suppliers referred to Citizens Advice generally but not the specific Consumer Service. Equally, half marks were given if either the website or the telephone number for the service was given.

The majority of suppliers mentions the Citizens Advice Consumer Service in their notification of unilateral contract variation and describes the service as free and independent/impartial. For one criteria, performance decreased among suppliers (mention of the Consumer Service). In all other criteria, the number of suppliers complying with the criteria improved greatly (between 35 to 42%).

Only 7% of suppliers mentioned the Ofgem Confidence Code⁷, which is a code of practice that governs independent energy price comparison sites. Inclusion of this in the notification of unilateral contract variation is optional for suppliers but is encouraged, so that customers are more aware what to consider when using price comparison websites. This audit saw a decline in the total number as well as the percentage of suppliers who referred to the Confidence Code compared to our 2014 audit.

⁷ [Ofgem-accredited price comparison sites guidance](#)

Table 4.4.3 Performance by scoring criteria

Criteria	2016 % of compliant suppliers	2014 % of compliant suppliers
Citizens Advice Consumer Service should be mentioned. <i>(Half marks given for mention of Citizens Advice)</i> (10)	80% (13%)	88%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	80%	38%
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description. (2)	73%	38%
The notification should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506). <i>(Half marks given for either the website or phone number being correct)</i> (10)	67% (20%)	31%
Reference to Ofgem Confidence Code (checked but not scored)	7%	18%

4.4.3 Performance on key notification of unilateral contract variation criteria

The scoring criteria awarded a higher number of points for information that we consider particularly important on the notification of unilateral contract variation. These are:

- whether the Citizens Advice Consumer Service was mentioned
- whether the website address and telephone number for the Citizens Advice Consumer Service was given.

Performance on these key criteria was good to average. 80% of suppliers mentioned the Consumer Service that Citizens Advice offers but only 67% provided the correct website address and telephone number to go with it. Although this is an increase on last year's results, there is still room for improvement.

4.4.4 Areas for significant improvement

Already, there have been improvements over the past 2 years on almost all of the criteria relating to the notifications of unilateral contract variation. Further improvements can however be made:

- Both website address and telephone number for the Citizens Advice Consumer Service should be provided (currently fulfilled by 67%). Given that 80% of suppliers do mention the service already, this should require minimal additions to the information already provided
- The "Know your Rights" document authored by Citizens Advice should be referenced on the notifications (currently fulfilled by 73% of suppliers)

4.5 Energy supply contract

The energy supply contract is a key document consumers receive, which should provide them with important information about their agreement with the supplier.

To be compliant with Ofgem regulations, the supplier must provide information about what a customer can do if they have any concerns, including details of how the Citizens Advice consumer service can be contacted. In 2013 and 2014 only the energy supply contract itself was audited against the criteria. However, in 2016 we have audited the supply contract and any accompanying literature to be in line with the current Ofgem regulations which allow this.

27 suppliers submitted contracts for audit in 2016. With Places for People not providing the documentation for audit.

4.5.1 Overall scores for energy supply contracts

There were a total of 75 points available for the energy supply contracts. Table 4.5.1 shows a summary of scores achieved for 2014 and 2016.

Table 4.5.1: Summary of scores in 2014 and 2016

	Out of	Highest Score	Lowest Score	Average	Median
2016	75	75	0	59%	68%
2014		75	0	42%	28%

The average score has increased in 2016 by 17% since 2014. Although the range has remained the same with suppliers both achieving the maximum and minimum points possible, the median has increased by 40% showing a shift in more suppliers achieving a greater score than in 2014.

Table 4.5.2 lists the overall scores of each supplier out of the maximum score available (75). For suppliers who had submitted documentation in 2014 their change in score is also reflected in the table.

Table 4.5.2: Ranking of suppliers (supply contracts)

	Position	Score	Change in Score since 2014
EDF Energy	1=	75	same score
First Utility	1=	75	+
E.ON	1=	75	+
Octopus Energy	1=	75	
SSE	5=	70	+
Zog	5=	70	
Bristol Energy	7	68	
Utility Warehouse	8	65	same score
Bulb	9	63	

British Gas	10	62	+
Go Effortless	11=	56	
Extra Energy	11=	56	
Scottish Power	13	53	-
Co-operative Energy	14	51	+
npower	15=	48	-
OVO Energy	15=	48	+
Spark Energy	17	41	+
LoCO2	18	37	same score
So Energy	19	30	
E Gas and Electric	20	22	
Utilita	21	20	same score
Ecotricity	22	15	+
Economy Energy	23	10	n/a in 2014
Cardiff Energy Supply Limited	23	10	
Robin Hood Energy	25	5	
Good Energy	26=	0	-
Better Energy	26=	0	
Places for People Energy	26=	n/s	

There were 4 suppliers who achieved the maximum score in 2016, this is an improvement from just one supplier (EDF Energy) reaching this in 2014. There were still suppliers not including any signposting in their supply contract, with 2 suppliers achieving 0 in 2016.

Due to the change in documentation included in this audit we would have expected to see an increase in scores, yet 3 suppliers have seen their scores decrease since 2014. 2016 has 7 suppliers seeing an increase in their scores.

4.5.2 Overall performance on specific energy supply contract scoring criteria

Table 4.5.3 provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016 and in 2014, sorted from highest to lowest proportion. Please note that the audited suppliers are to some extent different in 2016 when compared to 2014 as is the inclusion of accompanying literature in the 2016 audit.

Overall there has been an improvement in the percentage of suppliers meeting the criteria, with improvement seen in most criteria.

However, half of the criteria (7/14) were met by less than 50% of the suppliers. No criteria was met by all the suppliers.

The worst performing criteria is suppliers informing customers that the consumer service can be contacted at any stage of the complaints procedure, with just 30% of the suppliers including this (although this is a 9% improvement from 2014).

Table 4.5.3: Performance by scoring criteria

Criteria	2016 % of suppliers who met this criteria	2014 % of suppliers who met this criteria
Citizens Advice Consumer Service should be mentioned (<i>Half marks given for mention of Citizens Advice</i>). (10)	70% (15%)	74%
There should be a dedicated complaints section. (5)	70%	68%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	70%	47%
Ombudsman Services: Energy should be mentioned. (10)	67%	47%
Ombudsman Services: Energy should be located in the dedicated complaints section. (2)	63%	47%
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy. (2)	59%	42%
The contract should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506) (<i>Half marks given for either telephone or website being correct</i>). (10)	59% (19%)	21%
Both organisations should be given the same prominence. (2)	48%	42%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	48%	26%
Citizens Advice consumer service should be mentioned in the dedicated complaints section. (5)	44%	47%
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy. (2)	44%	37%
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description. (2)	44%	47%
The contract should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624). (<i>Half marks given for either website or telephone number being correct</i>) (10)	41% (15%)	26%
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process. (5)	30%	21%

4.5.3 Performance on key supply contract criteria

The scoring criteria awarded a higher number of points for website features that we consider particularly important. These are;

- whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned

- whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given.

In 2014 only 21% of suppliers mentioned the consumer service, and 26% mentioning the Ombudsman Services: Energy. In 2016 this has increased to 85% and 67% respectively showing improvement.

Although 78% of suppliers included consumer service contact details, only 59% of them included correct and up to date details. For the OS:E this was even less with 56% of the suppliers including contact details, of these only 41% were correct and up to date.

4.5.4 Areas for significant improvement

There has been improvement over the past 2 years, however there still remains considerable scope for improvement, including in the following areas;

- The consumer service and OS:E should be mentioned in a dedicated complaints section with correct and up to date contact details included.
- The consumer service should be mentioned that it can be contacted at any stage of the complaint.
- Include a reference to the 'Know Your Rights' document (only 44% suppliers included this in 2016 compared with 47% in 2014).

4.6 Complaints leaflets

Complaints leaflets or booklets provide an important repository of easy to access information on the complaints handling procedure. Suppliers were asked to send in any booklets or leaflets that are sent out to customers and contain information about making complaints. 22 suppliers submitted complaints leaflets in 2016, up from 20 in 2014. Two suppliers, Bulb and Cardiff Energy Supply Limited, provided adequate reasoning for not providing a complaints handling leaflet or booklet in 2016. Four suppliers, First Utility, Octopus Energy, People for Places Energy and Spark Energy, did not provide a complaints handling leaflet or booklet.

4.6.1 Overall scores of complaints leaflets

There were a total of 61 points available for the complaints leaflet section. Table 4.6.1 shows the summary of scores achieved.

Table 4.6.1 Summary of scores in 2014 and 2016

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
2016	61	61	17	80%	87%
2014		61	17	71%	72%

The limits of scores achieved remained the same from 2014 to 2016. However, the average score has increased. The median score has increased even more than the average, as a greater number of suppliers have scored higher in 2016.

This is reflected in Table 4.6.2, which shows only one supplier, Scottish Power, received a score lower than their 2014 score.

Table 4.6.2 Ranking of suppliers (complaints leaflets)

	Position	Score	Change in Score since 2014
EDF Energy	1=	61	same score
British Gas	1=	61	same score
E.ON	1=	61	+
SSE	1=	61	+
Ecotricity	1=	61	+
Utility Warehouse	1=	61	same score
Good Energy	7	59	+
LoCO2	8=	56	same score
Zog	8=	56	
Utilita	10=	54	+
So Energy	10=	54	
Bristol Energy	12	52	
Extra Energy	13	51	
Scottish Power	14	47	-
Robin Hood Energy	15=	44	
E Gas and Electric	15=	44	
Economy Energy	17=	42	+
npower	17=	42	same score
Co-operative Energy	17=	42	+
Better Energy	20	36	
Go Effortless	21=	17	
OVO Energy	21=	17	same score

Many new suppliers are towards the bottom of the ranking. Zog is the only new supplier to make the top 10. There are six suppliers who achieved full marks in this category, so that new suppliers So Energy, Bristol Energy and Extra Energy still received over 80% without making the top 10.

4.6.2 Overall performance on specific complaints leaflet scoring criteria

Ofgem regulations require suppliers to signpost to the Citizens Advice consumer service and Ombudsman Services: Energy with regards to their complaint handling procedures. Table 4.6.3 shows the performance of suppliers against each criteria.

Table 4.6.3 Performance by scoring criteria

Criteria	2016	2014
Ombudsman Services: Energy should be mentioned. (10)	100%	100%
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy. (2)	100%	100%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	86%	75%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	86%	75%
Citizens Advice Consumer Service should be mentioned. <i>(Half marks given for mention of Citizens Advice)</i> (10)	73% (18%)	90%
The leaflet/booklet should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and 'phone number (03454 040506). <i>(Half marks given for one of the telephone number or website being correct)</i> (10)	73% (14%)	35%
The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given. <i>(Half marks given for one of the telephone number or website being correct)</i> (10)	68% (18%)	35%
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy. (2)	59%	45%
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description. (2)	55%	30%
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process. (5)	45%	45%

All suppliers in both 2016 and 2014 clearly outlined the complaints procedure and included mention of the Ombudsman Services: Energy. However, there are some key areas for improvement.

4.6.3 Performance on key complaints leaflet criteria

The scoring criteria awarded a higher number of points for website features that we consider particularly important. These are:

- whether the Citizens Advice Consumer Service and the Ombudsman Services: Energy were mentioned
- whether the website address and telephone number for the Citizens Advice Consumer Service and the OS:E were given

Citizens Advice was referred to by 91% of suppliers, but only 73% referred correctly to the Citizens Advice consumer service. This is an important distinction to make as the consumer service is a quicker and more direct way of accessing advice than Citizens Advice local offices.

86% of suppliers also had some part of the contact details for both the Citizens Advice consumer service and Ombudsman Services: Energy correct, but only 73% for the consumer service and 68% for the OS:E were completely correct.

There was also no improvement in the signposting that Citizens Advice consumer service can be contacted at any time throughout the complaints process.

4.6.4 Areas for significant improvement

Although there has been improvement, less than 60% of suppliers still referred to Citizens Advice consumer service before the OS:E or included reference to the 'Know Your Rights' document in the leaflet.

4.7 Eight Week Letter and Deadlock Letter

In 2016, Citizens Advice included samples of the 8 Week Letter and Deadlock Letter in the signposting audit, which are key documents provided to customers along their complaints journey.

The audit was conducted on 14 8 Week Letters and 25 Deadlock Letters submitted in 2016. Below we detail suppliers' overall performance and give an overview of key scoring criteria.

For suppliers to meet Ofgem regulations, they must include (at a minimum) the following information in both letters:

- that the customer has the right to refer the complaint to OS:E;
- that it is independent of the energy company;
- that it is free of charge;
- the types of redress available (an apology; an explanation of what went wrong; a practical action to be taken to correct the problem; and, a financial award); and
- that its decision is binding on the company but not the customer.

4.7.1 Overall scores for 8 Week Letter and Deadlock Letter

A total of 27 points were available for each letter. Table 4.7.1 shows the range and average of scores in 2016.

Table 4.7.1 Summary of scores in 2016

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
8 Week Letter	27	27	22	98%	100%
Deadlock Letter		27	22	97%	100%

Scores were overall very high between 27 (full marks) and 22. The great majority of suppliers achieved full marks on both the 8 Week Letter and the Deadlock Letter, often using standardised text provided by the OS:E.

Table 4.7.2 lists the overall scores achieved by each supplier with the ranking out of the 24 suppliers audited on their 8 Week Letters and 25 suppliers audited on their Deadlock Letters in 2016. No comparison to 2014 scores could be made as this is the first time we have included the 8 Week and Deadlock Letters in our audit.

Table 4.7.2 Ranking of suppliers (8 Week Letter and Deadlock Letter)

	8 Week Letter		Deadlock Letter	
	Position	Score	Position	Score
EDF Energy	1=	27	1=	27
SSE	1=	27	1=	27
Zog	1=	27	1=	27
Utility Warehouse	1=	27	1=	27
LoCO2	1=	27	1=	27
E Gas and Electric	1=	27	1=	27
OVO Energy	1=	27	1=	27
E.ON	1=	27	1=	27
Scottish Power	1=	27	1=	27
So Energy	1=	27	1=	27
Utilita	1=	27	1=	27
npower	1=	27	1=	27
Co-operative Energy	1=	27	1=	27
Good Energy	1=	27	1=	27
British Gas	1=	27	1=	27
Extra Energy	1=	27	1=	27
Spark Energy	1=	27	1=	27
Economy Energy	1=	27	1=	27
Octopus Energy	1=	27	1=	27
Bulb	1=	27	1=	27
First Utility	1=	27	1=	27
Ecotricity	n/a	n/a	1=	27
Go Effortless	22=	22	23=	22
Bristol Energy	22=	22	23=	22
Places for People Energy	22=	22	23=	22

4.7.2 Overall performance on specific 8 Week Letter and Deadlock Letter scoring criteria

Table 4.7.3 below provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016 and in 2014, sorted from highest to lowest proportion.

All suppliers mentioned the OS:E in both letters and did mention the customer’s right to refer their complaint to the OS:E. Slightly fewer suppliers included a full description of the OS:E service and at which point a customer can contact them. Still fewer included the correct website and telephone number. Half marks were given if either the website or the telephone number for the OS:E was given.

Three suppliers lost marks either because they referred customers to the Ombudsman Services in general (not mentioning the specific energy service), or because they failed to fully describe the OS:E service, i.e. that it is free, independent, investigates complaints if no resolution is found after 8 weeks, and that decision is binding for suppliers.

Table 4.7.3: Performance by scoring criteria

	8 Week Letter	Deadlock Letter
Criteria	2016 % of suppliers who met this criteria	
Ombudsman Services: Energy should be mentioned (10).	100%	100%
The steps involved in the complaints procedure should be outlined and include mention of the Ombudsman Services: Energy / their right to refer complaint to the Ombudsman Services: Energy should be mentioned (2).	100%	100%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier (5).	96%	92%
The details of the Ombudsman Services: Energy website (www.ombudsman-services.org/energy) and phone number (0330 440 1624) should be given (<i>Half marks given for one of the phone number or website being correct</i>) (10).	92% (8%)	92% (8%)

4.7.3 Performance in key 8 Week Letter and Deadlock Letter criteria

The scoring criteria awarded a higher number of points for the features that we consider particularly important. These are:

- Ombudsman Services: Energy should be mentioned
- The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given

Whereas the first criterion was met by all suppliers, not all letters included the web address and telephone number. We are aware that suppliers may not want to include OS:E contact details on their website or bills to avoid that customers contact the OS:E too early before using a supplier's internal complaints systems. However, the 8 Week Letter and Deadlock Letter indicate that the customer is in the final stages of the complaints process and suppliers should make it as easy as possible for their customers to get access to further information and support by providing the OS:E contact details.

4.7.4 Areas for improvement

The high scores across suppliers and criteria indicates that the level of signposting in 8 Week Letters and Deadlock Letters is already very good across the industry. We can only recommend that, in order to avoid missing out on including essential information around the OS:E service or its contact details, to use the standardised text developed by the OS:E.

4.8 Audits of the Citizens Advice consumer service, Ombudsman Services: Energy and Energy UK websites

The websites of the Citizens Advice consumer service, Ombudsman Services: Energy and Energy UK were included in the 2014 audit, to see whether the three organisations are currently providing a joined-up service. We repeated this audit in 2016, to understand whether the three organisations had improved on providing a joined-up service. While we did not provide formal scores in either audit, due to the relevancy of the specific conditions, we did use the website scoring rubric as a basis for understanding how successful they are at signposting.

The audit of the three websites suggests improvements are possible for all three organisations.

The Citizens Advice consumer service and energy advice sections provided useful details and information about using these services and making a complaint about your energy supplier, as one might expect. While overall the service meets the criteria well, we identified the following changes could be made:

- The description of the Citizens Advice consumer service on the complaint pages did not specify that the advice is free as well as being independent/impartial;
- The energy complaint page does not make clear that you can consult the consumer service at any stage during the complaints process;
- The consumer service is not mentioned before the Ombudsman Services: Energy;
- While most of the advised details regard the OS:E are provided, we do not make clear the service is free.

Ombudsman Services: Energy had made most changes since the 2014 audit. In 2014, we had recommended that the Citizens Advice consumer service be included in their 'Complaint to an energy company' web page, which they have now done, specifying that free, independent advice can be received at any stage during the complaints process.

However, one recommendation has not been acted on. It would be helpful if the OS:E had a link to the Citizens Advice consumer service web form.

Energy UK continues to have good coverage of our recommendations, including the appearance of both the Citizens Advice consumer service and Ombudsman Services: Energy on a dedicated page devoted to making a complaint. The website also outlined the steps involved in making a complaint, and the role that the Citizens Advice consumer service and Ombudsman Services: Energy can play in the process.

Since the last audit, they have updated their description of the consumer service to make clear it offers free, independent and impartial advice and included up to date website and phone number details for both the consumer service and the OS:E.

However, the following recommendations' implementation would still be welcomed:

- The description should still make clear that the service can be consulted at any stage in the complaints process;
- The descriptions of the OS:E should make clear that their decision is binding on the supplier;
- A link to the Citizens Advice consumer service web form could also be helpfully included.

Given that these organisations should be working in partnership to direct consumers to the most appropriate sources of advice, it is important that there is greater awareness of the need to provide adequate and consistent signposting amongst all three organisations.

5. The findings in detail: non domestic suppliers

This is the first time Citizens Advice has extended the complaints signposting audit to non-domestic suppliers. Citizens Advice believes that suppliers should offer the same quality of signposting to their non-domestic suppliers as to their domestic suppliers.

5.1 Websites

The non-domestic supplier website audit was conducted on company websites as they appeared in October 2016. In this section, we detail suppliers' overall scores and rankings and an overview of the key scoring criteria. Ofgem regulations state that, in order to be compliant, a supplier to micro business customers must ensure that their complaints handling procedure appears on a clear and prominent location on their website.

5.1.1 Overall scores for websites

A total of 126 points were available for websites. Table 5.1.1 shows the range and average of scores in 2016.

Table 5.1.1 Summary of scores (website)

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
2016	126	121	0	57%	53%

When compared to domestic suppliers, the mean score is 20 percentage points lower while the median score is 25 percentage points lower. The range is also considerably higher, with two suppliers scoring 0 (Axis Telecom and Yorkshire Gas and Power).

Table 5.1.2 lists the overall scores achieved by each supplier with the ranking out of the 27 suppliers audited in 2016.

Table 5.1.2: Ranking of suppliers (websites)

Suppliers	Position	Score
EDF SME	1=	121
LoCO2	1=	121
National Gas	1=	121
SSE	1=	121
CNG	5	111
Total GP	6=	107
United Gas and Power	6=	107
Haven Power	8	106
Ecotricity	9	104
Dual Energy	10	102
British Gas	11	97
Good Energy	12	92
Scottish Power	13	89
Better Energy	14=	70
Dong	14=	70
BES Utilities	16=	67
EOn	16=	67
OVO Energy	18	62
Opus	19	52
Extra Energy	20	50
nPower	21	45
Utility Warehouse	22	40
Engie	23=	35
Go Effortless	23=	35
MA Energy	25	20
Axis Telecom	26=	0
Yorkshire Gas and Power	26=	0

4 suppliers take the joint first position (EDF SME, LoCO2, National Gas and SSE) and 10 suppliers have scores in excess of 100. However, 8 suppliers score less than 50, and across the board - as we detail below - there is considerable opportunity for improvement.

5.1.2 Overall performance on specific website scoring criteria

Table 5.1.3 provides information about the percentage of suppliers who fulfilled each scoring criteria in 2016 sorted from highest to lowest proportion. Some criteria were eligible for half marks, which is indicated by a '/' in the table below.

82% of suppliers have a dedicated complaints page and outline the steps involved in making a complaint. The worst performing category is providing a link to the Citizens Advice complaints form, which is fulfilled by only 27% of suppliers.

Table 5.1.3: Performance by scoring criteria

Criteria	2016 % of suppliers who met this criteria
Your website should have a dedicated complaints page (5)	85%
The steps involved in your complaints procedure should be outlined on your complaints page and include Ombudsman Services: Energy details (5)	85%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	78%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	67%
Details of Ombudsman Services: Energy should be located on dedicated complaints page (5)	63%
There should be a link to Citizen Advice consumer service on the webpage. (5)	63%
Your website should include details of the Ombudsman Services:Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624). (Half marks for one of the phone number or website being correct) (10)	63% /(19%)
Your website should include a link to the website of the Ombudsman Services: https://www.ombudsman-services.org/energy . (5)	63%
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process. (5)	59%
Your website should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506). (Half marks given for one of the phone number or website being correct) (10)	59% /(19%)
Your complaints procedure should be described on your website as opposed to a PDF document (5)	52%
There should be 2 or fewer 'page downs' hit to see Ombudsman Services: Energy details on your complaints page (5)	52%
Your website should include a link to the Ombudsman Services: Energy email - enquiries@os-energy.org (2)	48%
Citizens Advice Consumer Service should be less than 2 clicks away from the home page. (1 click/2 clicks) (10)	66% (44%/22%)
The word 'complaints' should appear on the homepage (with/without the customer having to move the cursor.) (10)	59% (44%/15%)

Details of Citizens Advice Consumer Service should be located on dedicated complaints page. (Half marks given for reference to Citizens Advice on the dedicated complaints page) (10)	44% / (7%)
When a customer enters the word 'complaint' into your website's search function, they should be taken directly to the complaints page (5)	41%
There should be 2 or fewer 'page downs' hit to see Citizens Advice Consumer Service details on your complaints page (5)	41%
Citizens Advice Consumer Service should be mentioned before Ombudsman Services: Energy (2)	41%
Ombudsman Services: Energy should be less than 2 clicks away from the home page. (1 click/2 clicks) (10)	67% (37%/30%)
There should be a link to Citizen Advice consumer service online webform on the on the webpage: https://forms.adviceguide.org.uk/complaint_energy.aspx (2)	26%

5.1.3 Performance on key website criteria

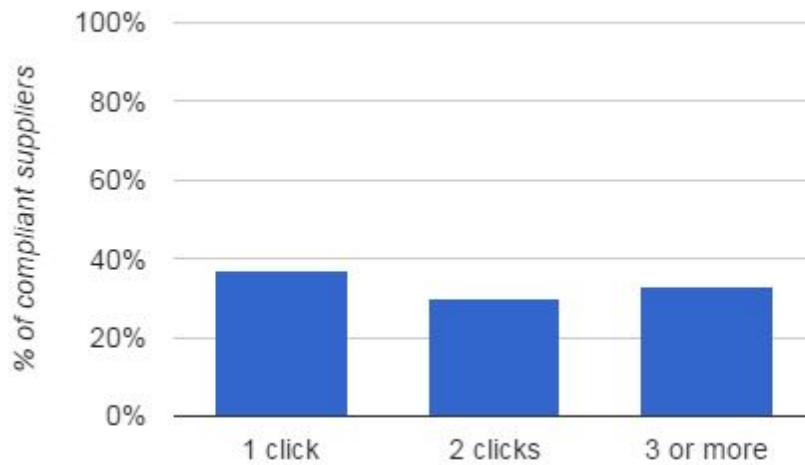
The scoring criteria awarded a higher number of points for website features that we consider particularly important. These are:

- Number of clicks from the home page to the Citizens Advice consumer service and Ombudsman Services: Energy (two or fewer was deemed acceptable)
- Whether the word 'complaint/s' appears on the home page without moving the cursor
- Presence of a dedicated complaints section
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy

Clicks to consumer service and OS:E

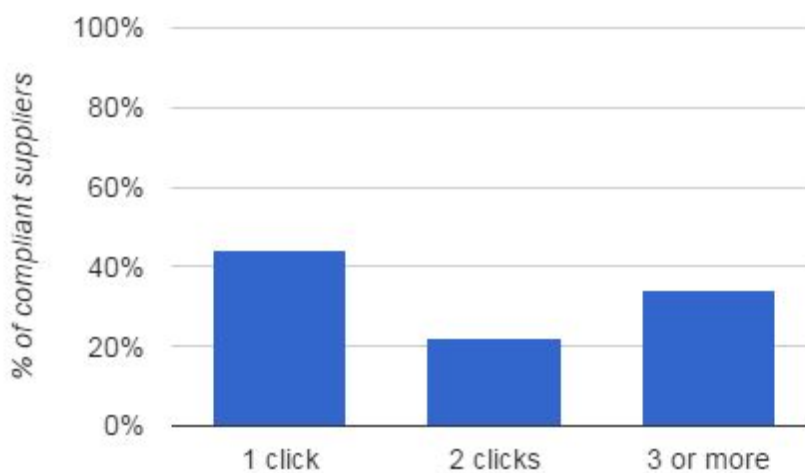
Ideally, the Citizens Advice consumer service should be one click away from the supplier's home page but half marks were available for 2 clicks. Our audit found that 44% of suppliers signposted within one click, while 22% signposted within two clicks. 34% of non-domestic suppliers either did not signpost or took 3 clicks or more.

Figure 5.1.1: Number of clicks from the home page to reach the Citizens Advice consumer service



Similarly, the Ombudsman Services: Energy service should be 1-2 clicks away from the supplier's home page. Figure 5.1.2 shows that the 37% of suppliers' websites signpost to the OS:E with 1 click. A further 30% signpost within 2 clicks, while 33% either do not signpost to the OS:E or take 3 or more clicks.

Figure 5.1.2: Number of clicks from the home page to reach Ombudsman Services: Energy



Prominence of the word ‘complaints’

Our scoring criteria rewards suppliers for having the word ‘complaint’ visible on the homepage of their website, ideally without moving the cursor. Only 41% of non-domestic suppliers fulfill this criteria, while 18% of non-domestic suppliers had the word complaints on the homepage with moving the cursor.

Dedicated complaints page

82% of non-domestic suppliers had dedicated complaints pages, which we consider the bare minimum of good practice. The suppliers without dedicated complaints pages were Axis Telecoms, MA Energy, Utility Warehouse and Yorkshire Gas and Power⁸.

Contact details for Citizens Advice consumer service and OS:E

Our scoring criteria rewarded suppliers for giving full contact details (website and telephone number) for both organisations on their websites. 55% of non-domestic suppliers correctly signposted to the Citizens Advice consumer service, while 64% correctly signposted to the OS:E.

Around 20% only receive half marks for these criteria, as some had included out of date contact details such as our old website (adviceguide.co.uk) or phone numbers. As for the domestic audit, we have requested that suppliers update this information urgently.

5.1.4 Areas for significant improvement

There are several areas in which there is still a lot of scope for some suppliers to improve on their scores, most notably the following (where the criteria is met by less than 60% of suppliers):

- A link to Citizens Advice consumer service online webform on the webpage (only fulfilled by 30%)
- Customers should be taken to the complaints webpage when they search for it (only fulfilled by 37%)
- The Citizens Advice consumer service should be mentioned before Citizens Advice only fulfilled by 57% of suppliers, versus 90% in 2014)

These are largely similar to the criteria which domestic suppliers scored poorest on, though the performance against each criteria is substantially lower.

5.2 Bills and statements

Bills and statements are the primary means of interaction between suppliers and consumers. Complaints signposting on suppliers’ bills and statements is therefore a critical part of this audit.

⁸ Utility Warehouse did host complaints information on their corporate website, but this was not easily accessed from the business website.

In this section, we detail suppliers' overall scores on this part of the audit. Suppliers were asked to send examples of bills for quarterly cash/cheque (QCC) customers, direct debit (DD) customers and pre-payment meter (PPM) customers. The following numbers of documents were received for audit. 22 examples of QCC bills and DD statements were received. Only three non-domestic suppliers contributed PPM statements. All suppliers provided sufficient justification for their lack of documentation.

5.2.1 Overall scores for bills and statements

Table 5.2.1 shows an overview of the scores for all bills and statements.

Table 5.2.1 Summary of bill and statement scores in 2016

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
Bill for QCC customer	68	63	0	41%	40%
Statement of account for dd customer	68	63	0	33%	36%
Statement of account for ppm customer	68	63	0	56%	75%

No suppliers achieved full marks, with the highest in each category being 63. Many suppliers use the same template or documentation for both QCC and DD customers. PPM statements are not included in the detailed analysis below due to the small sample size. Only three supplier submitted documentation for non-domestic prepayment customers. These were E.ON (score: 63), EDF SME (51) and Scottish Power (0). Table 5.2.2 shows the ranking and scores for the suppliers who submitted QCC bills and DD statements.

Table 5.2.2: Ranking of suppliers(bills and statements)

Bill for QCC Customers		Statement of account for DD customers	
Position	Score	Position	Score
1=. E.ON	63	1. E.ON	63
1= Utility Warehouse	63	2. npower	53
3=. CNG	51	3. EDF SME	51
3= EDF SME	51	4=. British Gas	46
5=. British Gas	46	4= SSE	46
5= SSE	46	6. Good Energy	44
7. Good Energy	44	7. Extra Energy	41

8. npower	43	8=. Ecotricity	29
9. Extra Energy	41	8= Engie	29
10=. Ecotricity	29	8= MA Energy	29
10= Engie	29	11. Total GP	25
12. Total GP	25	12. Dual Energy	24
13. Dual Energy	24	13. Scottish Power	19
14. Opus	19	14=. BES Utilities	0
14= Scottish Power	19	14= Better Energy	0
16. Axis Telecom	15	14= Dong Energy	0
17. Dong Energy	10	14= Haven Power	0
18. Better Energy	0	14= LoCO2	0
18= Go Effortless	0	14= Opus	0
18= LoCO2	0	14= OVO Energy	0
18= National Gas	0	14= United Gas and Power	0
18= OVO Energy	0	14= Yorkshire Gas and Power	0

5 companies received zero marks for QCC customers and 9 companies received zero for Direct Debit customers, indicating that they do not provide any complaints signposting on their bills. While we recognise that non-domestic customers have different needs, this is still poor practice and suppliers are encouraged to provide much more comprehensive signposting on their bills in future.

A couple of companies stand out for good practice in this regard, with E.ON and Utility Warehouse receiving the highest scores in the audit. However, for all suppliers, we believe there are substantial opportunities for improvement.

5.2.2 Overall performance on bills and statements scoring criteria

Table 5.2.3 shows the percentage of suppliers who fulfilled all criteria for the bills and statements (excluding PPM customers). It is ordered from highest to lowest score for QCC performance.

Table 5.2.3 Performance by scoring criteria

Criteria	QCC	DD
	2016	2016
Ombudsman Services: Energy should be mentioned. (10)	68%	55%

Ombudsman Services: Energy should be located in the dedicated complaints section. (2)	59%	50%
There should be a dedicated complaints section. (5)	55%	50%
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy. (2)	50%	45%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	45%	36%
Citizens Advice Consumer Service should be mentioned. <i>(Half marks given for mention of Citizens Advice)</i> (10)	41% (9%)	32% (5%)
Both organisations should be given the same prominence. (2)	41%	32%
Citizens Advice consumer service should be mentioned in the dedicated complaints section. (5)	32%	23%
Your bill should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624). <i>(Half marks given for either the website or phone number being correct)</i> (10)	32% (27%)	32% (18%)
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy. (2)	27%	18%
The bill should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506). <i>(Half marks given for either the website or phone number being correct)</i> (10)	9% (18%)	5% (14%)
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	5%	5%

5.2.3 Performance on key bills and statements criteria

Inclusion of Citizens Advice Consumer Service

Unlike domestic suppliers, non-domestic suppliers do not have a licence requirement to inform customers that the Citizens Advice consumer service can help in providing information and advice. However, given our remit extends to small business customers, we believe it is good practice for suppliers to do so.

Only 41% of suppliers mention the Citizens Advice consumer service in their QCC bills, plummeting to 32% for direct debit customers. A further 5% for QCC bills and 9% for DD mention Citizens Advice but don't specify the consumer service. We hope that non-domestic suppliers will improve their signposting for non-domestic customers in future years.

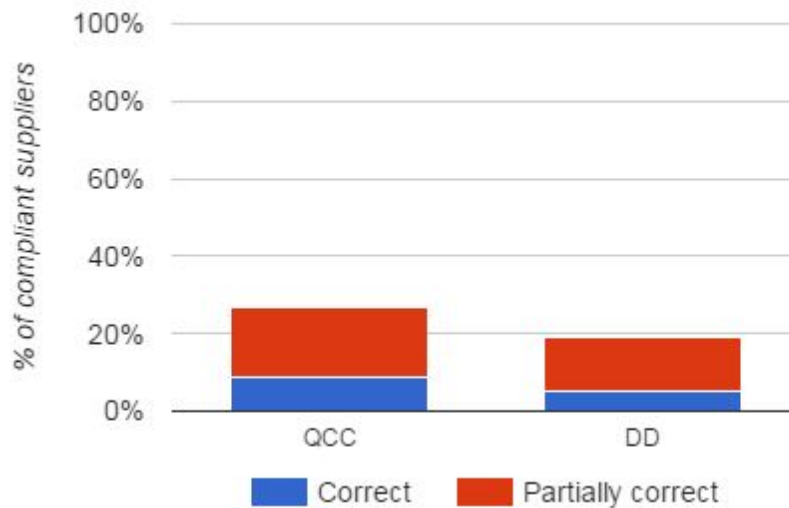
Those that do mention our service are describing it correctly, however. All of these non-domestic suppliers specify that we are free, independent and impartial.

Provision of correct Citizens Advice consumer service contact details

On this key criteria, non-domestic suppliers perform very poorly, with only 9% of suppliers providing correct information for QCC and 5% for direct debit bills, with 18% and 14% of non-domestic suppliers providing partially correct signposting. Where it is

partially correct, suppliers often reference an outdated website (www.adviceguide.co.uk) or an incorrect phone number. Figure 5.2.1 shows the

Figure 5.2.1 Citizens Advice consumer service contact details included on bills and statements



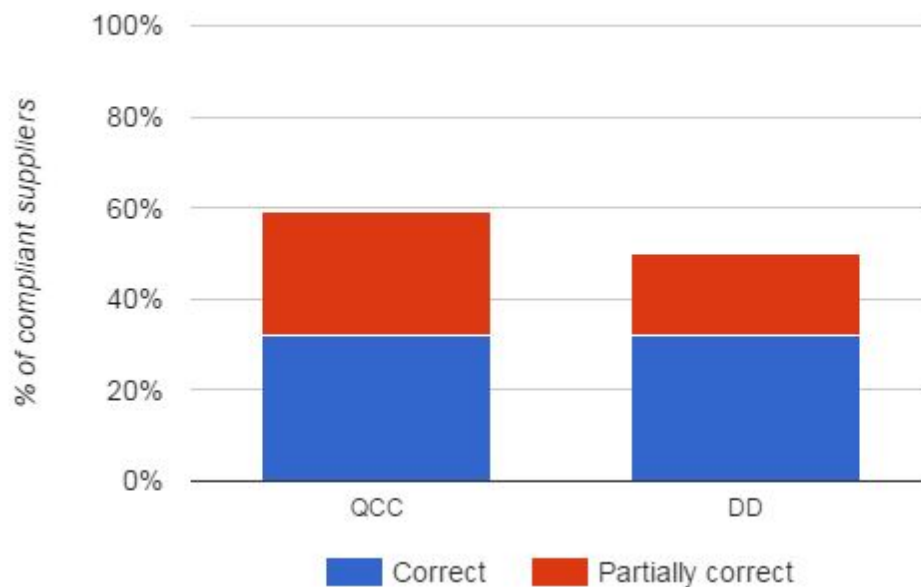
Inclusion of Ombudsman Services: Energy

In contrast with domestic suppliers, non-domestic suppliers were more likely to signpost to the Ombudsman Services:Energy than they were to the consumer service, with the OS:E being mentioned on 69% of QCC bills and 55% of direct debit bills. If a non-domestic supplier is referencing the OS:E, there is no rationale for not signposting the consumer service, as it is usually the case that the consumer service is a more appropriate source of support initially. However, there is still substantial opportunity for suppliers to improve their signposting here.

Provision of correct Ombudsman Services: Energy contact details

Figure 5.2.2 shows the proportion of non-domestic suppliers who mentioned the Ombudsman Services: Energy with correct or partially correct contact details. Partial scores were available for suppliers who got either the website or contact number details correct, but not both. Again, this is considerably better signposted than the consumer service, though there is still substantial room for improvement from many suppliers.

Figure 5.2.2: Correct Ombudsman Services: Energy contact details on bills and statements



5.2.4 Areas for significant improvement

This is the first year we have run the audit, so there is no trend to examine. However, there is still scope for improvement in the following criteria, which less than 50% of all non-domestic suppliers met across the bills and statements:

- Mentioning Citizens Advice consumer service and including it in the dedicated complaints section;
- Mentioning Citizens Advice consumer service before the Ombudsman Services: Energy;
- Giving both organisations equal prominence;
- Including correct contact details for Citizens Advice consumer service and the Ombudsman Services: Energy
- Outlining the steps involved in the complaints process and including the Ombudsman Services: Energy.

However, by far the worst scoring criteria was in the description of the OS:E. No supplier received marks for giving micro-businesses the the full description of the OS:E as independent, free, contactable after deadlock/8 weeks, and producing binding decisions on the supplier.

5.3 Notification of unilateral contract variation

Notifications of unilateral contract variation may leave non-domestic customers questioning why changes to their contract have been made - particularly when price rises occur which affect the customer's fixed costs and profit margins.

Non domestic suppliers do not have the same requirements as domestic suppliers regarding the processes they must follow for unilateral contract variations. It is therefore to be expected that many non domestic suppliers will not have produced such documents.

The audit was conducted on 10 notifications submitted in 2016. Below we detail suppliers' overall performance and give an overview of key scoring criteria.

5.3.1 Overall scores for notification of unilateral contract variation

A total of 25 points were available for the notification. Table 5.3.1 shows the range and average of scores in 2016.

Table 5.3.1 Summary of scores in 2016 (contract variation)

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
Contract variation	25	0	0	0%	0%

All 10 suppliers who submitted notifications for non-domestic customers scored zero on all criteria. Therefore Table 5.3.2 simply lists those suppliers rather than their ranking position. Comparing the rankings of suppliers across their domestic and non-domestic operations, we note that EDF, E.ON, LoCO2 and SSE were ranked first for their notifications of unilateral contract variation for their domestic customers, whereas they scored zero marks for their non-domestic notifications. This highlights the divergence in complaints signposting practices across these two markets.

Table 5.3.2 Ranking of suppliers (notification of unilateral contract variation)

Supplier	Score
EDF SME	0
E.ON	0
Good Energy	0
Haven Power	0
LoCO2	0
MA Energy	0
Opus	0
Scottish Power	0
SSE	0

Yorkshire Gas and Power	0
Dual Energy	n/s
Engie	n/s
Extra Energy	n/s
Total GP	n/s

5.3.2 Overall performance on notification of unilateral contract variation scoring criteria

The following table provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016. The criteria were the same as for the domestic customer signposting audit.

Table 5.3.3 Performance by scoring criteria (contract variation)

Criteria	2016 % of compliant suppliers
Citizens Advice Consumer Service should be mentioned.	0%
Citizens Advice consumer service should be described as free and independent/impartial.	0%
The notification should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	0%

5.3.3 Performance in key notification of unilateral contract variation criteria

The scoring criteria awarded a higher number of points for information that we consider particularly important on the notification of unilateral contract variation. These are:

- whether the Citizens Advice Consumer Service was mentioned
- whether the website address and telephone number for the Citizens Advice Consumer Service was given.

5.3.4 Areas for significant improvement

We recognise that there is no legal requirement for suppliers to be including the above signposting information. This audit highlights that voluntary signposting has not delivered change that we would have hoped to see. We will feed these results back to Ofgem in our future discussions.

5.4 Energy supply contract

The energy supply contract is a key document consumers receive, which should provide them with important information about their agreement with the supplier.

27 suppliers submitted their supply contract for audit in 2016.

5.4.1 Overall Scores of supply contracts

There were 73 points available for the energy supply contract section. Table 5.5.1 shows the summary of scores achieved.

Table 5.4.1 Summary of scores in 2016

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
Energy Supply Contract	73	56	0	12%	0%

No supplier achieved full marks, with only 10 suppliers scoring above 0, of these only 5 scored above the average (9). Table 5.4.2 shows the ranking of suppliers' contracts and scores.

Table 5.4.2 Rankings of suppliers (supply contracts)

	Position	Score
Go Effortless	1	56
British Gas	2	47
EDF SME	3=	44
Extra Energy	3=	44
Ecotricity	5	15
Utility Warehouse	6=	5
BES Utilities	6=	5
npower	6=	5
Total GP	6=	5
Dong Energy	6=	5
E.ON	11=	0
Good Energy	11=	0
SSE	11=	0
Scottish Power	11=	0
CNG	11=	0
Opus	11=	0
Haven Power	11=	0
OVO Energy	11=	0
Yorkshire Gas and Power	11=	0
National Gas	11=	0

LoCO2	11=	0
MA Energy	11=	0
Dual Energy	11=	0
Engie	11=	0
United Gas and Power	11=	0
Axis Telecom	11=	0
Better Energy	11=	0

5.4.2 Overall performance on specific energy supply contract scoring criteria

Table 5.4.3 shows the key audit criteria for the energy supply contracts. There is a significant difference in the scoring when compared to the domestic audit results. For example, 85% of domestic supply contracts mention the Citizens Advice consumer service compared with just 23% of the non-domestic contracts.

Table 5.4.3 Performance by scoring criteria

Criteria	2016 % of suppliers who met this criteria
There should be a dedicated complaints section. (5)	26%
Citizens Advice Consumer Service should be mentioned. (10)	19% (4%)
Ombudsman Services: Energy should be mentioned. (10)	15%
Ombudsman Services: Energy should be located in the dedicated complaints section. (2)	15%
Citizens Advice consumer service should be described as free and independent/impartial. (5)	15%
Citizens Advice consumer service should be mentioned in the dedicated complaints section. (5)	11%
Both organisations should be given the same prominence. (2)	11%
The contract should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624). (10)	7% (7%)
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy. (2)	4%
The contract should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506). (10)	4% (4%)
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	4%
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy. (2)	0%

The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process. (5)	0%
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Only 26% of suppliers had a dedicated complaints section, with 19% mentioning Citizens Advice consumer service, and 15% mentioning the Ombudsman Services: Energy. No suppliers contract mentioned Citizens Advice consumer service before the OS:E or mentioned that the Citizens Advice consumer service can be consulted at any stage of the complaint process.

5.4.3 Performance on key supply contract criteria

The scoring criteria awarded a higher number of points for supply contract features that we consider particularly important. These are;

- whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned
- whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given.

Only 19% of suppliers mentioned the consumer service, and no suppliers included it's contact details. There were less suppliers mentioning the OS:E (15%) and only 7% of suppliers included correct contact details (and a further 7% including partially correct contact details).

5.4.4 Areas for significant improvement

The overall low scores for signposting in energy supply contracts shows there is room for improvement across all the criteria.

5.5 Complaints leaflets

Complaints leaflets or booklets provide an important repository of easy to access information on the complaints handling procedure. Suppliers were asked to send in any booklets or leaflets that are sent out to customers and contain information about making complaints. 26 of the 27 non-domestic suppliers submitted complaints leaflets in 2016. Yorkshire Gas and Power did not provide a complaint handling leaflet or booklet.

5.5.1 Overall scores of complaints leaflets

There were a total of 59 points available for the complaints leaflet section. Table 5.5.1 shows the summary of scores achieved.

Table 5.5.1 Summary of scores in 2016 (complaint leaflets)

	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
Complaint Handling Leaflet	59	59	12	68%	71%

Most suppliers' complaint handling leaflets met the majority of the audit criteria, with an average score of 68%. However, the lowest score of 12 shows that some suppliers are not providing much of the information needed for clear signposting in these leaflets.

Table 5.5.2 shows the rankings and scores of the suppliers. Six suppliers received full marks for their complaints handling leaflets.

Table 5.5.2 Ranking of suppliers (complaints leaflets)

	Position	Score
E.ON	1=	59
EDF SME	1=	59
Good Energy	1=	59
Ecotricity	1=	59
Utility Warehouse	1=	59
National Gas	1=	59
British Gas	7=	57
SSE	7=	57
LoCO2	9	54
Extra Energy	10	49
Scottish Power	11=	47
BES Utilities	11=	47
npower	13=	42
MA Energy	13=	42
CNG	13=	42
Total GP	16	39
Opus	17	37
Better Energy	18	34
Dong Energy	19	27
Haven Power	20	22
Engie	21=	17
OVO Energy	21=	17
United Gas and Power	21=	17
Axis Telecom	21=	17
Go Effortless	21=	17
Dual Energy	26	12
Yorkshire Gas and Power	n/s	n/s

5.5.2 Overall performance on specific complaints leaflet scoring criteria

Table 5.5.3 shows the performance of suppliers against each criteria.

Table 5.5.3 Performance by scoring criteria

Criteria	2016 % of suppliers who met this criteria
Ombudsman Services: Energy should be mentioned. (10)	100%
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy. (2)	96%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	69%
The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given (10) <i>(Half marks given for one part of the detail correct)</i>	69% (15%)
Citizens Advice Consumer Service should be mentioned. (10) <i>(Half marks given for reference to Citizens Advice only)</i>	62% (12%)
Citizens Advice consumer service should be described as free and independent/impartial. (5)	62%
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy. (2)	42%
The leaflet/booklet should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and 'phone number (03454 040506). (10) <i>(Half marks given for one part of the detail correct)</i>	42% (12%)
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process. (5)	35%

All suppliers mentioned the Ombudsman Services: Energy and the vast majority clearly outlined the steps, including the OS:E. However there are key areas for improvement.

5.5.3 Performance on key complaints leaflet criteria

The scoring criteria awarded a higher number of points for leaflet features that we consider particularly important. These are:

- whether the Citizens Advice Consumer Service and the Ombudsman Services: Energy were mentioned
- whether the website address and telephone number for the Citizens Advice Consumer Service and the OS:E were given

Citizens Advice was referred to by 74% of suppliers, but only 62% referred correctly to the Citizens Advice consumer service. This is an important distinction to make as the consumer service is a quicker and more direct way of accessing advice than Citizens Advice local offices.

84% of suppliers had either the website or phone number for the OS:E correct, but only 69% had both correct. For the Citizens Advice consumer service, only 54% of suppliers had either website or telephone number correct, and only 42% had both completely correct.

5.5.4 Areas for significant improvement

There is still improvement to be made to ensure that the Ombudsman Services:Energy is correctly referred to, particularly that it is binding on suppliers. The description of Citizens Advice consumer service also requires improvement, with 38% of suppliers not referring to the consumer service as both free and independent/impartial, and only 35% of suppliers' leaflet mentioning that the consumer service can be consulted at any stage.

This message would also be clearer if Citizens Advice consumer service was referred to before the OS:E, which less than 50% of suppliers currently do.

5.6 Eight Week Letter and Deadlock Letter

In 2016, Citizens Advice included samples of the 8 Week Letter and Deadlock Letter in the signposting audit, which are key documents provided to customers along their complaints journey.

The audit of letters provided to non-domestic customers was conducted on 22 8 Week Letters and 26 Deadlock Letters. Below we detail suppliers' overall performance and give an overview of key scoring criteria.

5.6.1 Overall scores for 8 Week Letter and Deadlock Letter

A total of 27 points were available for each letter. Table 5.6.1 shows the range and average of scores in 2016.

Table 5.6.1 Summary of scores in 2016

Category	Out of	Highest Score	Lowest Score	Average (%)	Median (%)
8 Week Letter	27	27	20	95%	100%
Deadlock Letter		27	22	96%	100%

Scores were overall very high between 27 (full marks) and 20. The great majority of suppliers achieved full marks on both the 8 Week Letter and the Deadlock Letter. Similar to the letters to domestic customers, supplier often used the standardised text provided by the OS:E. We believe that this is the reason why, in this category, suppliers achieved the highest scores in the non-domestic audit.

Table 5.6.2 lists the overall scores achieved by each supplier with the ranking out of the 22 suppliers audited on their 8 Week Letters and 26 suppliers audited on their Deadlock Letters in 2016.

Table 5.6.2 Ranking of suppliers (8 Week Letter and Deadlock Letter)

8 Week Letter			Deadlock Letter		
Supplier	Position	Score	Supplier	Position	Score
BES Utilities	1=	27	BES Utilities	1=	27
British Gas	1=	27	British Gas	1=	27
CNG	1=	27	CNG	1=	27
EDF SME	1=	27	EDF SME	1=	27
E.ON	1=	27	E.ON	1=	27
Extra Energy	1=	27	Extra Energy	1=	27
Good Energy	1=	27	Good Energy	1=	27
Haven Power	1=	27	Haven Power	1=	27
npower	1=	27	npower	1=	27
Opus	1=	27	Opus	1=	27
OVO Energy	1=	27	OVO Energy	1=	27
Scottish Power	1=	27	Scottish Power	1=	27
SSE	1=	27	SSE	1=	27
Total GP	1=	27	Total GP	1=	27
Utility Warehouse	1=	27	Utility Warehouse	1=	27
Yorkshire Gas and Power	1=	27	Yorkshire Gas and Power	1=	27
Axis Telecom	17=	22	Dual Energy	1=	27
Dong Energy	17=	22	Ecotricity	1=	27
Engie	17=	22	LoCO2	1=	27
Go Effortless	17=	22	MA Energy	1=	27
United Gas and Power	17=	22	National Gas	1=	27
National Gas	22	20	Axis Telecom	22=	22
Dual Energy	n/s	n/s	Dong Energy	22=	22
			Engie	22=	22
			Go Effortless	22=	22
			United Gas and Power	22=	22

5.6.2 Overall performance on specific 8 Week Letter and Deadlock Letter scoring criteria

The following table provides information about the percentage of suppliers who fulfilled specific scoring criteria in 2016 sorted from highest to lowest proportion.

All suppliers mentioned the OS:E in both letters and almost all did mention the customer’s right to refer their complaint to the OS:E. Slightly fewer suppliers included a full description of the OS:E service and at which point a customer can contact them. Still fewer included the correct website and telephone number. Half marks were given if either the website or the telephone number for the OS:E was given.

Marks were lost due to errors such as referring to the General Ombudsman Services without mentioning the specific energy service, not mentioning that decisions by the OS:E are binding for suppliers, or spelling the OS:E's phone number incorrectly. Table 5.6.3 shows the percentage of suppliers who met all criteria for the 8 week and deadlock letters.

Table 5.6.3 Performance of suppliers against criteria (8 week and deadlock letters)

Criteria	8 Week Letter	Deadlock Letter
	2016 % of suppliers who met this criteria (and half marks achieved)	
Ombudsman Services: Energy should be mentioned. (10)	100%	100%
The steps involved in the complaints procedure should be outlined and include mention of the Ombudsman Services: Energy/the right to refer complaint to the Ombudsman Services: Energy should be mentioned (2)	95%	100%
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier. (5)	91%	96%
The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given. (Half marks given for either telephone or website being correct) (10)	82% (18%)	85% (15%)

5.6.3 Performance in key 8 Week Letter and Deadlock Letter criteria

The scoring criteria awarded a higher number of points for the features that we consider particularly important. These are:

- Ombudsman Services: Energy should be mentioned
- The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given

Whereas the first criterion was met by all suppliers, not all letters included the web address and telephone number. We are aware that suppliers may not want to include OS:E contact details on their website or bills to avoid that customers contact the OS:E too early before using a supplier's internal complaints systems. However, the 8 Week Letter and Deadlock Letter indicate that the customer is in the final stages of the complaints process and suppliers should make it as easy as possible for their customers to get access to further information and support by providing the OS:E contact details.

5.6.4 Areas for improvement

The high scores across suppliers and criteria indicates that the level of signposting in 8 Week Letters and Deadlock Letters for non-domestic customers is already very good across the industry. As in domestic customer section, we can only recommend that, in order to avoid missing out on including essential information around the OS:E service or its contact details, to use the standardised text developed by the OS:E.

APPENDIX A – SUPPLIER SCORING SYSTEM

WEBSITES

	SCORE
Citizens Advice Consumer Service should be 1 click away from the home page.	10
Citizens Advice Consumer Service is 2 clicks away from the home page. It should be 1 click away.	5*
Ombudsman Services: Energy should be 1 click away from the home page.	10
Ombudsman Services: Energy is 2 clicks away from the homepage. It should be 1 click away.	5*
The word 'complaints' should appear on the home page without the customer having to move the cursor.	10
The word 'complaints' appears on the home page only if the customer moves the cursor. It should appear without the customer having to move the cursor.	5*
When a customer enters the word 'complaint' into your website's search function, they should be taken directly to the complaints page	5
Your complaints procedure should be described on your website as opposed to a PDF document	5
Your website should have a dedicated complaints page	5
Details of Citizens Advice Consumer Service should be located on dedicated complaints page	10
Details of Ombudsman Services: Energy should be located on dedicated complaints page	5
There should be 2 or fewer 'page downs' hit to see Citizens Advice Consumer Service details on your complaints page	5
There should be 2 or fewer 'page downs' hit to see Ombudsman Services: Energy details on your complaints page	5
The steps involved in your complaints procedure should be outlined on your complaints page and include Ombudsman Services: Energy details	5
Citizens Advice Consumer Service should be mentioned before Ombudsman Services: Energy	2
There should be a link to the 'Know Your Rights' PDF (the most up to date version) within the Citizens Advice consumer service description.	5 ⁺
Citizens Advice consumer service should be described as free and independent/impartial.	5
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process.	5
Your website should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	10
There should be a link to Citizen Advice consumer service on the webpage.	5
There should be a link to Citizen Advice consumer service online webform on the on the webpage: https://forms.adviceguide.org.uk/complaint_energy.aspx	2

Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier.	5
Your website should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624).	10
Your website should include a link to the website of the Ombudsman Services: https://www.ombudsman-services.org/energy .	5
Your website should include a link to the Ombudsman Services: Energy email - enquiries@os-energy.org	2
TOTAL	131

* - not included in maximum score

+ - not included in non-domestic audit, giving a maximum score of 126

BILL FOR QCC CUSTOMERS, STATEMENT OF ACCOUNT FOR DD CUSTOMERS AND STATEMENT OF ACCOUNT FOR PPM CUSTOMERS

	SCORE
Citizens Advice Consumer Service should be mentioned.	10
Ombudsman Services: Energy should be mentioned.	10
There should be a dedicated complaints section.	5
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy.	2
Citizens Advice consumer service should be mentioned in the dedicated complaints section.	5
Ombudsman Services: Energy should be located in the dedicated complaints section.	2
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy.	2
Both organisations should be given the same prominence.	2
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description.	2 ⁺
Citizens Advice consumer service should be described as free and independent/impartial.	5
The bill should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	10
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier.	5
Your bill should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624).	10
TOTAL	70

+ - not included in non-domestic audit, giving a maximum score of 68

ANNUAL STATEMENT

	SCORE
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Citizens Advice Consumer Service should be mentioned.	10
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description.	2
There should be reference to Ofgem confidence code	2
Citizens Advice consumer service should be described as free and independent/impartial.	2
The statement should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	10
TOTAL	26

Note: Annual Statement is not a requirement for non-domestic suppliers and therefore not included in the non-domestic audit.

NOTIFICATION OF UNILATERAL CONTRACT VARIATION

	SCORE
Citizens Advice Consumer Service should be mentioned.	10
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description.	2 ⁺
Citizens Advice consumer service should be described as free and independent/impartial.	2
The notification should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	5
Citizens Advice Consumer Service should be mentioned.	10
TOTAL	29

⁺ - not included in non-domestic audit, giving a maximum score of 27

ENERGY SUPPLY CONTRACT

	SCORE
Citizens Advice Consumer Service should be mentioned.	10
Ombudsman Services: Energy should be mentioned.	10
There should be a dedicated complaints section.	5
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy.	2
Citizens Advice consumer service should be mentioned in the dedicated complaints section.	5
Ombudsman Services: Energy should be located in the dedicated complaints section.	2
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy.	2
Both organisations should be given the same prominence.	2
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description.	2 ⁺
Citizens Advice consumer service should be described as free and independent/impartial.	5

The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process.	5
The contract should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	10
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier.	5
The contract should include details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624).	10
TOTAL	75

+ - not included in non-domestic audit, giving a maximum score of 73

COMPLAINT HANDLING LEAFLET/BOOKLET

	SCORE
Citizens Advice Consumer Service should be mentioned.	10
Ombudsman Services: Energy should be mentioned.	10
The steps involved in the complaints procedure should be clearly outlined and include Ombudsman Services: Energy.	2
Citizens Advice consumer service should be mentioned before Ombudsman Services: Energy.	2
There should be reference to the 'Know Your Rights' document within the Citizens Advice consumer service description.	2 ⁺
Citizens Advice consumer service should be described as free and independent/impartial.	5
The customer should be told that Citizen Advice consumer service can be consulted at any stage of the complaint process.	5
The leaflet/booklet should include details of the Citizens Advice consumer service website www.citizensadvice.org.uk/energy and phone number (03454 040506).	10
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier.	5
The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given	10
TOTAL	61

+ - not included in non-domestic audit, giving a maximum score of 59

8 WEEK LETTER AND DEADLOCK LETTER

	SCORE
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Ombudsman Services: Energy should be mentioned.	10
The steps involved in the complaints procedure should be outlined and include mention of the Ombudsman Services: Energy/the right to refer complaint to the Ombudsman Services: Energy should be mentioned	2
Ombudsman Services: Energy should be described as free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier.	5
The details of the Ombudsman Services: Energy website www.ombudsman-services.org/energy and phone number (0330 440 1624) should be given	10
TOTAL	27

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