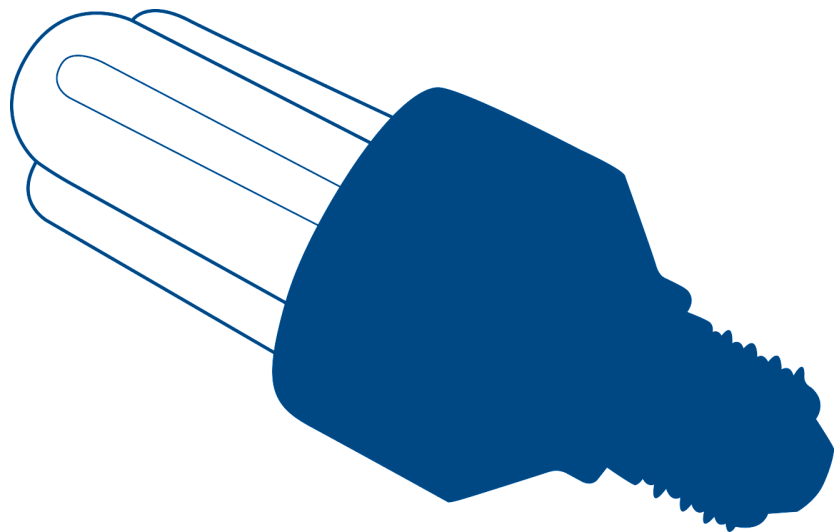


Energy supplier rating

Consultation on a rating
for smaller supplier
performance

July 2018



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Summary

The Citizens Advice energy supplier rating was first published in 2016.¹ It provides consumers with accessible information about energy supplier performance and enables consumers to make informed switching decisions.

We want to increase the coverage of the rating as soon as possible to meet the needs of consumers in a market where the number of suppliers is growing rapidly.

We are also using this opportunity to ask stakeholders about minor changes to the rating methodology, in response to regulatory and market changes.

Responses to the consultation are required by **7 September 2018**.

Alongside the consultation we have issued a draft information request to the smaller suppliers. We will send out the final version of the information request with the decision document in October. We will work with suppliers as they enter the market and as the threshold is approached to ensure they understand their obligations.

It is important to note that throughout the consultation we talk about meter points as opposed to customer accounts or customer numbers. This means individual accounts for gas and electricity, therefore a dual fuel customer is counted twice.

¹<https://www.citizensadvice.org.uk/about-us/how-citizens-advice-works/citizens-advice-consumer-work/supplier-performance/energy-supplier-performance/compare-domestic-energy-suppliers-customer-service/>

Background

Purpose of consultation

Citizens Advice has statutory duties to publish data on energy supplier performance² and to provide advice and information to consumers.³

There is currently a lack of information on smaller supplier performance, and many of the cheapest companies on our price comparison tool⁴ do not have a star rating. Our aim is to provide a regularly updated star rating for as many domestic suppliers as possible.

Our timeline for the consultation is set out below (figure 1). The earliest we will publish the first iteration of the new rating is in either March 2019 or June 2019 (dependent on consultation outcome).

Figure 1: Consultation timeline



Market coverage

Our Q1 2018-9 rating⁵, published in June 2018, covers 32 suppliers who provide gas and electricity to over 99% of households. This will increase to 35 suppliers in the next iteration (Q2 2018-19) and we expect it to reach nearly 40 suppliers by the end of 2018 (Q3 2018-19).⁶

² Utilities Act 2000, Part 3, Section 21

³ Consumers, Estate Agents and Redress (CEAR) Act 2007, Section 10

⁴ <https://energycompare.citizensadvice.org.uk/>

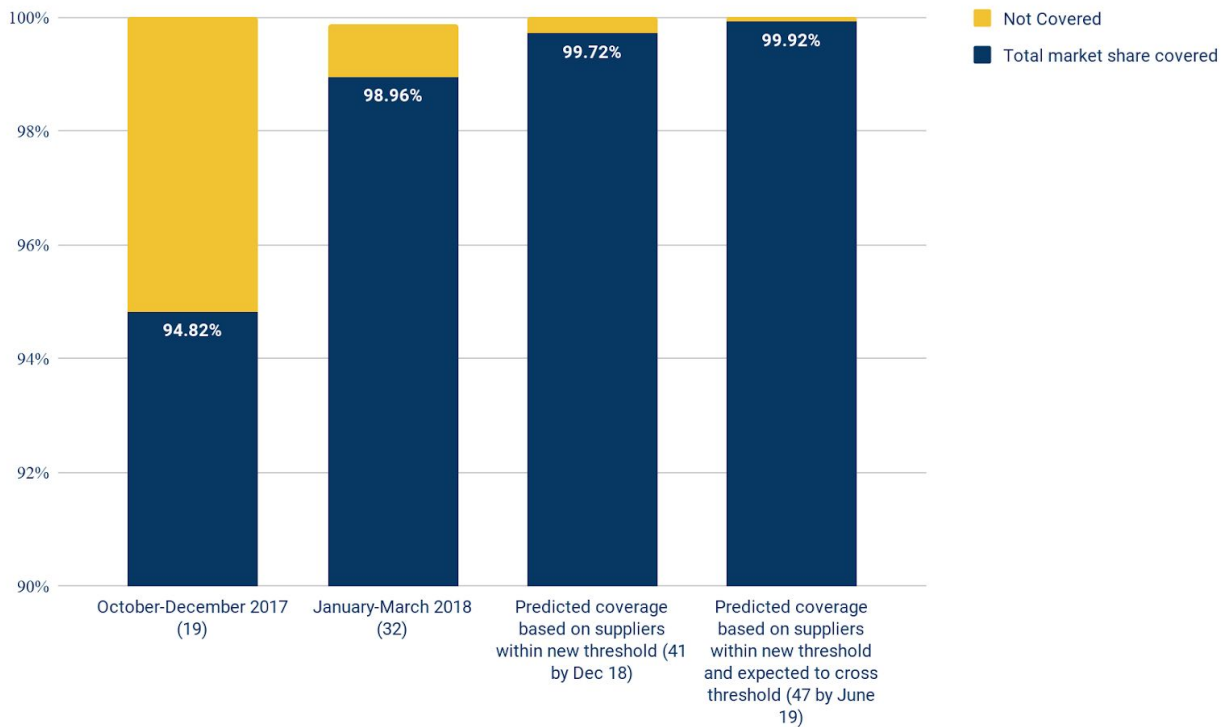
⁵

<https://www.citizensadvice.org.uk/about-us/how-citizens-advice-works/citizens-advice-consumer-work/supplier-performance/energy-supplier-performance/compare-domestic-energy-suppliers-customer-service/>

⁶ The rating design was reviewed in 2017 in order to improve the rating. This included increasing the number of suppliers in the rating and changing the data used to score some areas of performance

We want to increase the number of suppliers in the rating. At present it includes suppliers with over 50,000 domestic gas and electricity meter points. We are proposing to expand the existing rating to automatically include all suppliers with over 25,000 meter points. This will increase the number of suppliers in the rating to almost 50 suppliers offering nearly 100% market coverage (see figure 2).

Figure 2: Percentage of market share coverage⁷



Timeline for suppliers joining the rating

Suppliers are required to provide data for the rating for the first full quarter after they pass the meter point threshold. We will work with suppliers as they enter the market and as the threshold is approached to ensure they understand their obligations.

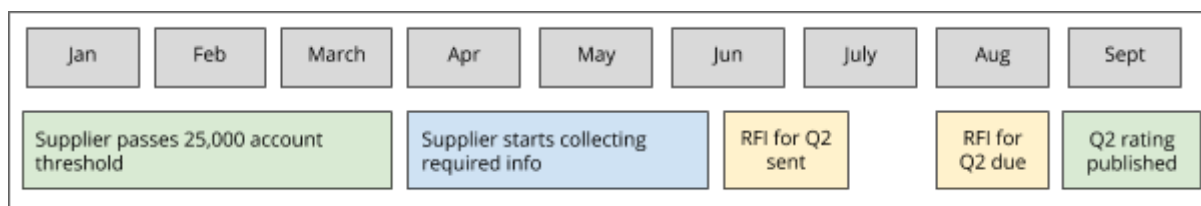
⁷ The proportions given are a percentage of the available data. This does not include suppliers who did not submit their market share data during the period. Predicted coverage is based on January-March 2018 data. Daligas and Gnergy Oct-Dec 2017 figures have been added to the Jan-Mar 2018 totals. For the second predicted value, Daligas and Gnergy figures have been taken from Oct-Dec 2017 submission as we did not receive market share data for Jan-Mar 2018. The number in brackets on the horizontal axis refers to the number of suppliers covered or predicted to be covered.

NB Coverage includes Iresa which ceased trading on 27 July 18.

As shown in the indicative timeline below, a supplier crossing the meter point threshold in the first quarter of the year, would need to ensure they were collecting the relevant data during the second quarter of the year. This would enable them to respond to the formal request for information (RFI) sent at the end of that quarter. The supplier then has 6 to 8 weeks to collate the data and respond to the RFI. We will publish the rating around 3 weeks after this, including a week long comment period for suppliers to review the rating calculation.

The complaints data in the rating is calculated by Citizens Advice separately to this process. The first draft is shared with suppliers for 2 rounds of comment ahead of its inclusion in the rating. The first draft is also accompanied by each supplier's raw data, an OS:E disputes reconciliation file (for suppliers that engaged in the process), a mini model tool to allow suppliers to verify the calculations using their raw data, and a guide to the process for suppliers.

Figure 3: Indicative timeline for suppliers joining the rating



Market share data

Our star rating is reliant on accurate information about suppliers' market share to ensure all eligible suppliers are included and to support the calculation of our complaints metric.

Many suppliers have been voluntarily submitting customer complaints data (and therefore quarterly customer numbers) to Ofgem and Citizens Advice (including Citizen Advices' predecessors) since the inception of the Complaint Handling Regulation Standards Regulations (CHR) from 1 October 2008.⁸ But not every supplier has been providing this data in a timely fashion.

⁸ 'The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008' (CHRs) prescribe standards for handling consumer complaints by regulated providers and for supplying information to consumers about the prescribed standards, as well as complying with those standards (<http://www.legislation.gov.uk/ukxi/2008/1898/contents/made>).

In January 2018, Ofgem announced a revision to their reporting arrangements for monitoring complaints.⁹ From 1 July onwards, all suppliers must submit customer complaints information to the regulator. As part of this process all suppliers will be required to send Ofgem monthly reports on the number of customer accounts (to be provided separately for gas and electricity, such that a dual fuel customer is counted twice). Suppliers should also send the monthly direct complaints reports to Citizens Advice. This will ensure that Citizens Advice is able to access timely information about market share.

Options considered

As part of this project we have considered several options about how to develop a rating for smaller supplier performance. Each option is outlined in this section.

Option 1: Expand the existing rating to include suppliers with over 25,000 meter points

This approach would include suppliers with over 25,000 meter points into the existing supplier rating. The suppliers would be scored against the same metrics as in the existing rating.

Complaints are scored as in our existing complaints data, which ranks suppliers on the ratio of complaints made to the independent bodies.¹⁰

Billing information, customer service performance and switching will come from data directly from the supplier via a formal RFI. More information on the metrics can be seen below (page 12).

Figure 4: Proposed rating design for option 1

Category	Weighting	Metric	Data source
Complaints	35%	Existing complaints ratio	Ombudsman: Energy (OS:E), consumer service (CS), Extra Help Unit (EHU)
Billing	20%	Accuracy of bills	RFI

⁹<https://www.ofgem.gov.uk/publications-and-updates/guidance-submitting-customer-complaints-data>

¹⁰ Citizens Advice, [Domestic supplier energy performance data](#), 2018

		Timeliness of bills	RFI
Customer service	20%	Average call waiting time	RFI
Switching	15%	Switches completed in 21 days	RFI
Customer commitments	10%	Membership of the switch guarantee, and other voluntary schemes	Publicly available

Key benefits of this approach

- The RFI for the switching, billing and customer service metrics will be expanded to all qualifying suppliers.
- A better user experience on the Citizens Advice price comparison site and a fairer comparison of suppliers

Disadvantages of this approach

- Suppliers with less than 25,000 meter points are excluded. This means there will need to be clearer information about why these suppliers don't have a full rating.
- The complaints data process would need to cope with the increased number of suppliers
- Slight inconsistency with the existing complaints data if consumer service referrals are excluded

Option 2: Develop a separate model for the rating for suppliers with less than 50,000 meter points.

This would create a new supplier rating for the suppliers under 50,000 meter points.

The complaints data could be based on information from our consumer service data only or on a simplified version of the approach we use for larger suppliers (ie based on consumer service, OS:E and EHU data). For the consumer service approach it would be calculated as a percentage of the supplier's customer base who are contacting the service over a rolling 3 months. The simplified version of our current approach would involve creating a benchmarked 'average' complaints rate and have an indication if the supplier was above or below average.

The other metrics would come from publicly available information which shows where suppliers are going above and beyond to demonstrate the standard of service provided to their customers, by offering options which are not mandated until they are of the size to be included in the existing rating.

Figure 5: Proposed rating design for option 2

Category	Metric	Data source
Complaints	Use a percentage of consumer service complaints of a supplier's customer base (on a 3 month rolling basis) OR	CS
	Benchmark complaints data against the average for suppliers with less than 50,000 customer accounts and illustrate by providing a thumbs up/thumbs down or an above average / below average approach ranking.	OS:E, CS, EHU
Key information	Warm Home Discount, Offering Payment options (PPM/paper billing)	Publicly available
Customer commitments	Membership of the switch guarantee	Publicly available

Advantage of this approach

- Could provide a rating for all small suppliers, not just those with over 25,000 meter points.

Disadvantages of this approach

- There would be consistency issues when comparing the new model to the existing rating.
- Different ratings on the Citizens Advice price comparison tool would be confusing to consumers.

Option 3: Hybrid of current model and new metrics

This option will create a new rating for suppliers of under 50,000 meter points.

The complaints and key information metrics will be the same as in Option 2. There will be an additional metric for switching information, which would be the same as used by the existing rating. This would be based on Guaranteed Standards reporting, which Citizens Advice has statutory access to.

Figure 6: Proposed rating design for option 3

Category	Metric	Data source
Complaints	Use CS, EHU and OS:E complaints data (excluding company referrals) either as a percentage of complaints of a supplier's customer base (on a 3 month rolling basis) weighted type of complaint as per main rating OR	OS:E, CS, EHU
	Benchmark complaints data against the average for suppliers with less than 50,000 customer accounts and illustrate by using a thumbs up/thumbs down or an above average / below average approach.	OS:E, CS, EHU
Switching	Switching Guaranteed Standards data ¹¹ - Ofgem is proposing to introduce a Guaranteed Standard that would require switches to be completed within 21 days (reporting data on performance against this standard will be mandatory)	RFI

¹¹<https://www.ofgem.gov.uk/publications-and-updates/supplier-guaranteed-standards-performance-consultation-switching-compensation>

Key information	Warm Home Discount, Offering Payment options (PPM/paper billing)	Publicly available
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Advantage of this approach

- Could provide a rating for all small suppliers, not just those with over 25,000 meter points.

Disadvantages of this approach

- There would be consistency issues when comparing the separate model to the existing rating.
- Two different ratings on the Citizens Advice price comparison tool would be confusing to consumers.
- It is reliant on Ofgem's Guaranteed Standards proposals going ahead with the proposed reporting requirements unchanged.

Option 4: Complaints only

This will create a new rating for the suppliers with under 50,000 meter points based only on their complaints performance. This could involve creating a new metric using a weighting based on their customer base, or use the existing metric as per previous options.

Figure 7: Proposed rating design for option 4

Category	Metric	Data source
Complaints	Use only CS, EHU and OS:E complaints data (excluding company referrals). Either using the existing metric, or creating a new one as % of complaints of customer base	OS:E, CS, EHU

Advantages of this approach

- Could provide a rating for all small suppliers, not just those with over 25,000 meter points.

Disadvantages of this approach

- There would be consistency issues when comparing a complaints only model to the existing rating.
- Two different ratings on the Citizens Advice price comparison tool would be confusing to consumers.
- The rating would only cover a supplier's complaints performance as opposed to their wider customer service performance.

Minded-to option

Option 1: Expand the existing rating to include suppliers with over 25,000 meter points

It is our minded-to position to expand the existing rating to include all suppliers with more than 25,000 meter points. We think this is the most appropriate approach to ensure that the model continues to be robust and comparable. This will increase coverage to nearly 50 suppliers.

We think the benefits of expanding the existing rating to include all suppliers with more than 25,000 meter points will mean a better user experience on the Citizens Advice price comparison site and a fairer comparison of suppliers. In our view, this is an appropriate minimum threshold for ensuring our rating continues to be based on consistent and comparable data.

We want to provide as much information as possible about the customer service performance of all suppliers, but acknowledge that the very smallest and/or newly launched suppliers may not be suitable for inclusion in the full rating.

It is important that consumers understand why a supplier doesn't have a customer service star rating. Currently the Citizens Advice price comparison tool displays 'no rating' in the customer service column when a supplier doesn't have a rating. We are testing different approaches to displaying this information.

The existing complaints data process would need to cope with the increased number of suppliers and suppliers would need to provide the required information to a good standard. We expand on these points in the non-compliance with RFIs section of the consultation on page 21.

Q1: Do you agree with our minded-to option to expand the existing rating to include suppliers with over 25,000 meter points? If no, what would you suggest as an alternative approach?

Voluntary inclusion in the rating

As part of the last consultation we decided that we would let suppliers with fewer than 50,000 meter points voluntarily join the supplier rating.¹² So far none have done so. However we will continue to offer this option to suppliers with fewer than 25,000 meter points. This will be subject to meeting the following criteria from the start of the quarter that they would begin to be rated:

- putting in place referral pathways from the consumer service to the supplier
- meeting minimum standards for signposting to Citizens Advice and OSE
- having a minimum of 10,000 meter points

Suppliers joining voluntarily will also need to agree to remain part of the rating for at least a year. Those that fail to continue to provide data will be considered non-compliant. To protect the integrity of the rating we reserve the right to exclude suppliers at our discretion.

Metrics

We are planning to use the same metrics as currently used in the existing supplier rating. We hope this will avoid confusion for consumers, and provide comparability across the industry.

We understand that some smaller suppliers are already capturing these metrics to assist with their internal reporting and to ensure they are providing a good service to consumers, and complying with their regulatory obligations. It is good practice to measure these metrics and it is our view that requiring suppliers to provide information on the metrics included in the star rating will not be an undue burden on suppliers.

Q2: Do you agree with our proposals to use the same metrics (outlined below) as the existing supplier rating, for suppliers with over 25,000 meter points?

¹²

<https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20decision%20document.pdf>

Complaints

Company referrals from the consumer service

Domestic suppliers with over 50,000 meter points are currently required to set up formal referral arrangements with the consumer service. Suppliers below the threshold can apply to voluntarily join these arrangements.

Consumer service referral arrangement requirements

- Provide an email address for referrals from the consumer service. This can be an existing email, as long as it's actively monitored. Email referrals need to be responded to within 5 days.
- Provide a local rate telephone number which can be answered within 60 seconds. This does not need to be dedicated number, as long as it can be answered within the required time.
- Join and regularly update our Referral Agency Signposting Tool (RAST) with company details and protocols

If we retain the current threshold for referrals, complaints data will be less comparable as it will not be possible to include consumer service referrals in the complaints score.

Figure 8: Complaints weightings

Case type	Definition	Weighting
Citizens Advice Consumer Service advice cases	These are cases where a consumer has sought independent advice or help (not information) from Citizens Advice Consumer Service. Please note that due to data protection issues it is not possible for suppliers to have full visibility of these cases.	10
Citizens Advice Consumer Service cases referred to	These are more serious cases received which are referred to the supplier's dedicated complaint handling team. These include cases where after an initial contact with Citizens Advice Consumer Service the consumer has followed the advice	25

energy companies	provided and the supplier has not resolved their issue in a reasonable time period. It also includes cases where consumers who have already progressed through or part-way through the company's complaint procedures and are not getting reasonable resolution.	
Complaints received by Extra Help Unit	These are complaints from vulnerable consumers that have been referred from Citizens Advice consumer service to the Extra Help Unit (EHU) where a consumer who is vulnerable, has been disconnected or is at risk of disconnection or needs support due to the complexity of the case and has previously tried to resolve their complaint with their supplier and has been unable to do so.	25
Cases received by Ombudsman Services: Energy	These are cases accepted by Ombudsman Services: Energy, the industry alternative dispute resolution scheme, because the consumer has been unable to get their complaint resolved for more than eight weeks.	30

We think there are two options going forward:

- lower the requirement for company referrals from the consumer service to 25,000 meter points or
- retain the existing requirements, and remove the weighting for consumer service referrals for suppliers with between 25,000 to 49,999 meter points

Our minded-to option is the former; to lower the requirement for company referrals from the consumer service to 25,000 meter points. We believe this is beneficial for consumers and suppliers alike, as the consumer's problem is more likely to be resolved at an earlier stage. This prevents complaints progressing further on the complaints journey, ie an OS:E case. Other reasons include the fact that the market has evolved and an increased number of consumers are with small suppliers. Additionally we have seen cases where we are unable to offer referrals and this has sometimes resulted in poor outcomes. We believe it is fair for all consumers to have the same service, as much as possible. We already ask suppliers to set up the referral process in advance of the 50,000 meter point threshold in order to ensure they are ready once it is crossed, so we don't think there are technical barriers.

The alternative would mean that company referrals would not be included in the complaints score. If we pursue the alternative option we will need to consider how we score this as part of the rating.

Q3: Do you support our minded-to option to lower the threshold for a supplier to have a consumer service referral, or to retain the existing requirements and remove the weighting for those under 50,000 meter points?

Change in ratio for all suppliers

We are proposing a change to the complaints ratio for all suppliers. Complaints would be calculated as a ratio per 10,000 meter points, weighted per case type (Figure 8 above). We think this is more appropriate as a large number of suppliers in the rating will have fewer than 100,000 meter points, so this will not be an appropriate ratio.

This change would apply for all suppliers in the rating, and would require us to amend our scoring thresholds accordingly. We think it would be robust, consistent and more comparable for suppliers to be ranked using the same ratio.

Q4: Do you agree with lowering the weighting to per 10,000 meter points for all suppliers as the most appropriate approach? If not, what would be a more appropriate alternative approach?

Other metrics

For all other metrics we propose using the same data as the current rating. These are summarised below.

In our previous consultation¹³ we identified that these metrics are important to customers and had wide industry support. To collect this data we plan on expanding the current RFI to suppliers with over 25,000 meter points.

Billing: accuracy

This is the percentage of accurate bills sent to domestic customer accounts that the supplier has supplied and which have been paid by a method other than prepayment over the last 12 months.

¹³ Citizens Advice '[Consultation on changes to the Citizens Advice energy supplier rating](#)', 2017

An accurate bill means any bill which reflects an actual meter reading which has been provided since the last bill - whether the meter reading has been provided by the customer, taken by a meter reader, or transmitted by a smart meter (in line with SLC 21B.1).

This metric currently only applies to suppliers who have supplied more than 5,000 credit customers for more than a year. Suppliers who do not meet this threshold are scored according to bill timeliness only. It is likely that a number of smaller suppliers may not meet this threshold. We are open to reviewing the threshold and would particularly welcome input from suppliers in this situation.

Billing: timeliness

This is a percentage calculated from bills, statement of accounts, and Annual Statements. For bills and statement of accounts it is the percentage sent within 15 working days of the date they were due to be sent (according to the billing frequency agreed with the customer). This metric excludes final bills.

For Annual Statements it is the percentage that were due to be issued to domestic customer accounts (both credit and prepay) that were issued within the Relevant Time (as defined in licence).¹⁴ Ofgem has recently proposed removing the requirement for Annual Statements. If these changes go ahead we will adjust our approach to assessing bill timeliness (see page 18).

Customer Service

This is the mean average wait time to answer inbound, domestic customer initiated, telephone services. This excludes dedicated inbound sales lines, and any time in which the consumer is routed through an Interactive Voice Recording (IVR). We intend to review the inclusion of other contact methods (eg email) later this year (see page 19).

Switching

This measures the percentage of switches completed within 21 days of the contract being agreed, as a proportion of all switches which should have been completed in this period (ie excluding those which are delayed for valid reasons).

¹⁴ The Relevant Time is defined in SLC 31A.17 to mean 'as soon as possible after the last month of each 12 Month Period, but in any event no later than 30 days after the end of that 12 Month Period'.

Any suppliers that join the Energy Switch Guarantee will already be required to report similar data.

Customer guarantees

This is based on the membership of voluntary schemes, to recognise suppliers making commitments that go beyond their licence obligations. Scoring is based on membership of the following schemes:

- Energy Switch Guarantee¹⁵
- Safety Net for Vulnerable Customers¹⁶
- Prepayment Principle¹⁷
- British Standard for inclusive service provision (BS 18477)¹⁸

Q5: Do you agree that these are appropriate metrics for suppliers with more than 25,000 meter points? If not, please provide evidence to support your answer.

Scoring

Our current scoring thresholds are set out below. As stated in the 2017 consultation¹⁹, these are a matter for Citizens Advice to set, and we will not be consulting on them here. However, we will keep thresholds under review as we make these changes.

Score	5	4	3	2	1
Complaints score (per 100,000 customers)	<50	50 - 150	150 - 300	300 - 550	>550
Average call centre wait time (seconds)	< 30s	30s - 90s	90s - 180s	180s - 300s	>300s
Switches completed within 21 days	More than 98%	95% - 98%	90% - 95%	80% - 90%	Less than 80%

¹⁵ <https://www.energyswitchguarantee.com>

¹⁶ <https://www.energy-uk.org.uk/policy/disconnection.html>

¹⁷ <https://www.energy-uk.org.uk/policy/prepayment-meters.html>

¹⁸ <https://www.bsigroup.com/LocalFiles/en-GB/consumer-guides/resources/BSI-Consumer-Brochure-Inclusive-Services-UK-EN.pdf>

¹⁹ https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20consultation%20on%20proposed%20changes_v2.pdf

Customers who had accurate bill in the past year					
Bills and statements sent on time					
Customer guarantees	Suppliers score 3 points for membership of the Energy Switch Guarantee, and one point each for membership of the other eligible schemes (up to a maximum of 5)				

Proposed changes to the existing rating

We are planning a number of changes to the current rating, for housekeeping purposes and in line with our previous commitments to review certain elements. These changes may be made ahead of the proposed inclusion of smaller suppliers.

Bill timeliness

Ofgem’s recent consultation on customer communications included proposals that will have knock-on impacts for the supplier rating.²⁰ These would remove the requirement for Annual Statements, and to introduce a principle-based requirement for all consumers to receive Bills, statements and billing information.

We currently ask all suppliers about the timeliness of their Bills and Annual Statements. For suppliers with predominantly prepayment customers, this means we measure timeliness performance based on Annual Statements only.

If the requirement for Annual Statements is removed we will ask all suppliers about the timeliness of their Bills and statements only. We do not expect to ask suppliers about the timeliness of ‘billing information’, which may take a variety of formats (eg online information, texts etc). Given that Ofgem’s proposal sets out that all customers will now receive Bills and statements, we will use this measure for all suppliers, including those with mostly prepayment customers.

²⁰<https://www.ofgem.gov.uk/publications-and-updates/domestic-supplier-customer-communications-rulebook-reforms>

We currently measure the proportion of bills sent within 15 working days, based on the requirement from the Code of Practice for Accurate Bills.²¹ Energy UK is currently reviewing the Code. We will consider any changes they make to this requirement in relation to the threshold we use to assess performance.

Q6: If Ofgem’s changes proceed, do you agree with our proposal to measure bill timeliness performance based on Bills and statements only? If you disagree, please include an explanation.

Switching

Ofgem is proposing to introduce a Guaranteed Standard that would require switches to be completed within 21 days.²² They have also proposed that reporting data on performance against this standard will be mandatory.

Citizens Advice has the legal power to publish Guaranteed Standards performance data. If the proposal goes ahead we will consider whether this data could be used in relation to our switching metric to prevent duplication of effort.

Customer service

We currently measure customer service based on call centre wait times only. It is our view that suppliers are currently required to have an inbound telephone service, in line with Ofgem’s open letter on telephone services.²³ We will continue to include inbound telephone services as a measure for all suppliers while this remains the case.

We considered including other contact methods in the rating alongside inbound telephone services at the time of our consultation last year. The data we received from suppliers demonstrated that telephone remained the largest source of contacts for almost all suppliers.²⁴ We also had concerns that information about response times for other forms of contact was not being recorded in a robust and comparable way.

However, we were also aware that communication preferences are changing quickly in the market and agreed to keep this measure under review. We are planning to issue a request for information (RFI) later in the year to collect data

²¹<https://www.energy-uk.org.uk/customers/energy-industry-codes/code-of-practice-for-accurate-bills.html>

²²<https://www.ofgem.gov.uk/publications-and-updates/supplier-guaranteed-standards-performance-consultation-switching-compensation>

²³<https://www.ofgem.gov.uk/publications-and-updates/telephone-services-our-expectations-suppliers-operating-domestic-energy-market>

²⁴ Citizens Advice, [Decision on changes to the energy supplier rating](#), November 2017.

on the prevalence and response times for the following communication methods:

- Webchat
- Email
- Online messaging services (eg facebook messenger)
- Telephone ringbacks

We will use this to make an assessment of whether data on these communication methods is suitable to be included in the rating, alongside telephone services.

Q7: Are these the right communication methods to consider? Please give a reason why, and let us know if there are others we should include in this exploratory RFI. Please include details about what data you collect about these communication methods currently.

Supplier rankings

We rank suppliers in the rating tool on our site to enable users to understand where suppliers are performing in relation to one another. If suppliers have the same rating we currently give them the same ranking, and then jump down to a lower ranking for the next supplier.

Figure 9: Tied suppliers in the current rating design

2	E (Gas and Electricity)	5 ★★★★★	4 ★★★★☆	5 ★★★★★	5 ★★★★★	0 ☆☆☆☆☆	4.3 ★★★★☆
2	Engle	5 ★★★★★	5 ★★★★★	4 ★★★★☆	5 ★★★★★	0 ☆☆☆☆☆	4.3 ★★★★☆
4	SSE	5 ★★★★★	3 ★★★☆☆	4 ★★★★☆	4 ★★★★☆	5 ★★★★★	4.25 ★★★★☆

However, this can be confusing to users, as it can look like some rankings are missing. Currently where ties occur the suppliers are listed in alphabetical order, which could give an advantage to the supplier listed higher if users do not look at the tied ranking and assume that the first has performed better.

In order to overcome this, we are proposing to break tied ratings based on the performance in relation to complaints. We think this data is the best candidate as a tie-breaker because:

- The complaints score is based on independent data
- Complaints accounts for the biggest component of the rating (35%)

- The complaints score will always be published in the rating table, even if suppliers have not responded to an RFI or withheld consent for data to be published.

We will clearly explain on the rating methodology page²⁵ how this tie-breaking system operates.

Q8: Do you agree with our proposal to rank suppliers with a tied rating based on their complaints score?

Non-compliance with RFIs

As we highlighted in the supplier rating review decision document²⁶ we think that increasing the number of suppliers, and our reliance on RFIs, means there is more risk that suppliers may fail to provide us with the information required to produce the rating. To mitigate this risk we decided that suppliers who fail to provide information within the required timescales will score zero in the relevant category.

Suppliers have a legal duty to respond to RFIs from Citizens Advice. We will refer any failures to comply to Ofgem, who can take enforcement action.²⁷ However we recognise that enforcement action can be a lengthy process, and would only proceed in line with Ofgem's enforcement guidelines.²⁸

As such we remain of the view that there may be circumstances in which we have to apply a score of zero to non-compliant suppliers. We think that this ensures good outcomes to consumers by increasing the likelihood that suppliers comply with our information requests. Publishing incomplete information about suppliers who fail to comply would not enable consumers to make informed choices and could be unfair on compliant suppliers.

In order to avoid non-compliance we will continue to publish a schedule for the RFIs so that all suppliers are aware of when they need to respond. We will also send reminders of the due dates in advance, and require suppliers to confirm receipt of this message.

²⁵<https://www.citizensadvice.org.uk/about-us/how-citizens-advice-works/citizens-advice-consumer-work/supplier-performance/energy-supplier-performance1/how-the-scores-are-worked-out/>

²⁶<https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20decision%20document.pdf>

²⁷ Consumers, Estate Agents and Redress Act 2007, Section 25

²⁸ <https://www.ofgem.gov.uk/publications-and-updates/enforcement-guidelines>

Suppliers have a responsibility to take steps to avoid non-compliance. If a supplier has concerns about their ability to comply they should let us know as soon as possible. Where there are exceptional circumstances we may decide that a supplier should not be penalised for failing to provide information.

In addition to suppliers failing to responding, we are also keen to ensure the quality of data provided. We will continue to take steps to check data provided by individual suppliers against other sources of industry data available to us.

White labels

In the decision document published in November 2017 we stated that we would consider requests to score some aspects of the rating differently for white labels and permission would be on case-by-case basis.²⁹ We will be continuing with this approach.

Our previous consultations

February 2018: [Decision on supplementary proposals](#)

November 2017: [Decision on energy supplier rating review](#) and consultation responses

July 2017: [Consultation on changes to the energy supplier rating](#)

October 2016: [Decision on improving energy supplier performance information](#) and consultation responses

July 2016: [Consultation on improving energy supplier performance information](#)

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<https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating%20-%20decision%20document.pdf>

Consultation questions

Questions	
Minded-to option	
1	Do you agree with our minded-to option to expand the existing rating to include suppliers with over 25,000 meter points? If no, what would you suggest as an alternative approach?
Current metrics	
2	Do you agree with our proposals to use the same metrics as the existing supplier rating, for suppliers with over 25,000 meter points?
3	Do you support our minded-to option to lower the threshold for a supplier to have a consumer service referral, or to retain the existing requirements and remove the weighting for those under 50,000 meter points?
4	Do you agree with lowering the weighting to per 10,000 meter points for all suppliers as the most appropriate approach? If not, what would be a more appropriate alternative approach?
5	Do you agree that these are appropriate metrics for suppliers with more than 25,000 meter points? If not, please provide evidence to support your answer.
Proposed changes to the existing rating	
6	If Ofgem's changes proceed, do you agree with our proposal to measure bill timeliness performance based on Bills and statements only? If you disagree, please include an explanation.
7	Are these the right communication methods to consider? Please give a reason why, and let us know if there are others we should include in this exploratory RFI. Please include details about what data you collect about these communication methods currently.

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

Citizens Advice welcomes responses from suppliers, key stakeholders and any other interested parties on the issues raised in this document.

Responses are due by **7 September 2018**. Please send to Jenni Lucas-Williams at jenni.lucas-williams@citizensadvice.org.uk and Alice Brett at alice.brett@citizensadvice.org.uk

Citizens Advice will acknowledge all consultation responses received. Please remember to state your contact details in your response.

Citizens Advice will publish responses to this consultation on its website and may refer to their contents in subsequent publications. If you wish for all or part of your response to remain confidential, or if you would like it to be published anonymously, please indicate this in the response.

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