

# **Improving energy supplier performance information - energy supplier comparison tool consultation**

Consultation decision document

October 2016



# About Citizens Advice

The Citizens Advice Service provides free, confidential and impartial advice to help people resolve their problems. As the UK's largest advice provider, the Citizens Advice Service is equipped to deal with any issue, from anyone, spanning debt and employment to housing and immigration plus everything in between. The Citizens Advice Service values diversity, promotes equality and challenges discrimination.

Citizens Advice and Citizens Advice Scotland (CAS) are the statutory representatives for consumers of energy and postal services in England, Scotland and Wales, and CAS is the consumer representative for water in Scotland. The Citizen Advice Service assumed these duties between 2012 and 2014, along with the national Consumer Service helpline, the lead role in consumer education from the former Office of Fair Trading (OFT), and the consumer advocacy role of Consumer Futures.

These changes to the consumer landscape created a single consumer voice with key strengths. We maintain the technical expertise and ability to scrutinise the regulated markets in the informed way consumers have come to expect. This work is now bolstered by the strengths of the Citizens Advice Service, from real-time data to a recognised and trusted brand to a physical presence providing advice in communities across the country.

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# 1. Summary and key findings

Citizens Advice issued a consultation<sup>1</sup> in July 2016 on plans to improve the publication of energy supplier performance information. We proposed to introduce a new online comparison tool that ranks energy suppliers according to a set of metrics and an overall performance rating. We also proposed that the overall supplier performance rating would be published on the results page of the Citizens Advice price comparison website<sup>2</sup> (PCW), and other PCW's dependent on appetite.

The consultation closed on 9 September 2016, and we received 22 responses from stakeholders. Most responses came from domestic energy suppliers, a few from third party intermediaries and other stakeholders.<sup>3</sup> The responses to the consultation have been published alongside this document. Citizens Advice has thoroughly reviewed all responses and considered the issues raised by each of the respondents.

Overall the responses have indicated that stakeholders are, in principle, supportive of our intentions to deliver the energy comparison tool. Respondents expressed their support on the basis that the project is delivered appropriately and founded on robust consumer research. We agree with respondents that this is essential. Several respondents also told us they strongly supported the project. The key themes from the responses are summarised in Section 1.1.

Many respondents agreed with our underlying objectives<sup>4</sup> for the project, and thought that the introduction of the tool would have a positive impact for consumers. Respondents supported our intention to improve existing performance information in order to empower consumers to make informed decisions. Several respondents suggested that the transparency the tool will deliver will help build consumer trust in the energy industry.

Respondents expressed the importance of performance data being robust, accurate and independent. As set out in the consultation document, this is an essential part of the project. For the tool to add value and be a credible representation of supplier performance, we believe the data we use must have a high level of integrity, be robust, independent and impartial.

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<sup>1</sup> [Citizens Advice improving energy supplier performance information consultation \(July 2016\)](#)

<sup>2</sup> [Citizens Advice price comparison website](#)

<sup>3</sup> Ofgem, Ombudsman Services Energy, Energy UK, Energy Action Scotland

<sup>4</sup> Project objectives: improve the performance information published by Citizens Advice, making it more accessible to consumers; better coordinate how supplier performance information is published; improve how supplier performance information can be shared between Citizens Advice and other organisations.

Several respondents raised the importance of the new information complementing existing information, so as not to duplicate resources or introduce inconsistencies. We strongly agree with this and are working closely with stakeholders throughout the delivery of the project to ensure the publication of information is coordinated.

Respondents also expressed support for our proposal to publish the overall supplier performance rating alongside the results on a PCW. See Section 4 for project milestones and dates for when this part of the project will be delivered.

Several respondents raised concerns in relation to particular proposals. We have reviewed all comments and our responses to specific concerns are detailed within this document.

## 1.1 Key themes

### **Consumer research and testing**

Many respondents raised the importance of underpinning the design of the tool with consumer research. It was suggested that consumer research should validate the proposals regarding the selection of metrics, scoring and weighting.

Citizens Advice believe that consumer research and insight is essential to inform the design of the comparison tool. We also agree with respondents who told us that the factors important to consumers when making decisions about their energy supplier should inform the design of the tool.

At the beginning of this project we reviewed existing research conducted by Citizens Advice and other industry stakeholders. We have reviewed research carried out by Ofgem, the Competition and Markets Authority (CMA) and Energy UK to sense-check our metrics.<sup>5</sup> We are confident that the metrics reflect the consumer interests that we have identified in other pieces of research.

In March 2016, we undertook research with energy consumers to shape our initial project proposal. The research informing our selection of metrics is explained in Section 3.1.

We are confident that the research reviewed and undertaken, and the output from discussions with stakeholders, has been thoroughly considered as part of the project and has informed our final proposals. We also believe it is essential to continue to collect evidence after the comparison tool has been published, to understand how consumers use the resource once it is live. We will collect this

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<sup>5</sup> Existing research reviewed as part of this project includes - [Energy UK survey 2014](#), GFK for Citizens Advice 2014, [CMA GFK survey \(February 2015\)](#), [Energy UK survey 2015](#), [Ofgem TNS BMRB 2016 survey](#), [Ofgem complaints handling survey 2016](#)

information on an ongoing basis (against a defined impact criteria) and undertake periodic evaluation to inform any future development of the tool.

Several suppliers raised the importance of stakeholders and consumers testing the comparison tool before it is published. Some also suggested that our project timeline prevented sufficient research from being undertaken. We do not believe this is the case. Testing the tool prior to publication is an essential part of the project. Informal feedback has been gathered throughout the course of the project, which has led to changes being made to the design of the tool. Testing of the tool with consumers and stakeholders will commence from mid October.<sup>6</sup>

We have also decided that the first release of the tool will be a soft launch<sup>7</sup>, which will allow us to continue to test how the tool is received for the first three months after it is live on our website. We also note that if any significant changes need to be made to the tool in the future, this will be informed by and tested with consumers and stakeholders.

## **Market coverage**

For the first release of the comparison tool we have proposed publishing metrics and an overall rating for 17 domestic energy suppliers - those with a customer base of 150,000 or more. The rationale for this decision is based on the representative data samples we have been able to source for the first release.

Most respondents raised concerns about this proposal, but many also supported our rationale for the decision. One respondent told us they did not support the delivery of the comparison tool due to the proposed market coverage of the first release.

In relation to market coverage, respondents also highlighted the importance of clear messaging for consumers about the scope of the tool. We agree this is essential, and will ensure that the accompanying text fully explains why data is not currently available for suppliers under a certain size. See Section 3.3 for further detail on market coverage.

## **GFK research**

Citizens Advice subscribe to a quarterly energy industry market research survey. This survey collects representative data from energy consumers who are customers of the largest energy suppliers. Originally representative data was only available to us for the largest 6 suppliers, but more recently we have also received it for the

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<sup>6</sup> See project milestones in Section 4

<sup>7</sup> The first release of the tool will be launched on our website and price comparison tool. We will not be issuing a press release.

next 4 largest suppliers. Over the last year we have published two metrics<sup>8</sup> from this survey for the largest 6 energy suppliers only.

For the purpose of the energy comparison project, we commissioned a sample boost for as many suppliers that we were able to receive representative data for. Due to the required sample sizes for this activity, we are able to reach appropriate customer sample sizes for energy suppliers with a customer base of 150,000 and over.

In response to our proposal to include metrics from the GfK consumer survey, we received queries from respondents about the GfK research methodology. Before the consultation closed the GfK methodology was provided to all suppliers in scope of the first release of the tool.

We remain confident that the output of the GfK research is independent and robust, and based on appropriate sized samples. GfK have provided the following comment in response to queries.

The GfK Consumer Panel is a large scale panel of 10,000 homes recruited to be demographically representative of the wider household GB population. The panel is maintained and recruited to be 75% continuous from wave to wave and questionnaires related to energy are served on a quarterly basis, achieving an average sample size of 9,845 over the last 8 quarters.

All panellists undergo stringent email duplication, postcode validation checks, as well as captcha and straight lining checks.

GfK is a Market Research Society (MRS) Company Partner

GfK follows ICC/ESOMAR The World Association of Research Professionals

ISO 20252:2006 Market, Opinion and Social Research Standard

ISO 9001:2008 Quality Assurance Standard

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<sup>8</sup> [Citizens Advice energy customer service tool](#)

## 2. Background to consultation

As the statutory body responsible for representing the interests of consumers in the energy sector, a core function of the Citizens Advice service under the Consumers, Estate Agents and Redress Act 2007<sup>9</sup> is the dissemination of advice and information to energy consumers. Under the Utilities Act 2000<sup>10</sup> Citizens Advice has the explicit responsibility to publish information about the energy market, including data about the performance of domestic energy suppliers.

The Citizens Advice energy team, working closely with other teams across the organisation, source and publish energy supplier performance information. This information currently exists in a few formats on the Citizens Advice website. We believe that there is scope to improve the current information provided and to derive greater value for energy consumers.

We commenced the energy supplier comparison tool project earlier this year to explore how domestic energy supplier performance information, published by Citizens Advice, could be further developed. Our research has led us to propose the development of an online energy comparison tool as a solution. The tool will rank energy suppliers according to their performance against 5 metrics.<sup>11</sup>

Through the delivery of the energy comparison tool we intend to:

- Improve the performance information published by Citizens Advice, making it more accessible to consumers.
- Better coordinate how supplier performance information is published.
- Improve how supplier performance information can be shared between Citizens Advice and other organisations.

In July we consulted on plans to improve our publication of energy supplier performance information and introduce the comparison tool. The purpose of the consultation was to inform our final decisions and ensure our end solution provides value to consumers, suppliers and industry stakeholders. This document outlines our response to feedback we've received from stakeholders as part of the consultation.

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<sup>9</sup> [Consumers, Estate Agents and Redress \(CEAR\) Act 2007, Section 10](#)

<sup>10</sup> [Utilities Act 2000, Part 3, Section 21](#)

<sup>11</sup> See Section 3.1 for detail about 5 metrics



## 3. Feedback and decisions

### 3.1 Metrics

We proposed that the comparison of energy supplier performance will be measured against 5 metrics (complaints, customer service, billing, switching and customer commitments). The energy team are confident that these 5 metrics will provide consumers with an comprehensive view of a supplier's overall level of performance. Our consultation asked stakeholders whether they supported the metrics that have been selected.

The majority of respondents were supportive of all of the proposed metrics, with the exception of the customer commitment metric. Several respondents expressed support on the basis that the 5 metrics would help inform consumers when making decisions. Others told us that some of the metrics were already published and the proposed tool would improve the current quality of this information.

A few respondents suggested ways of validating the selected metrics. We are grateful to the contribution made by suppliers and have carefully considered the suggested ideas. We are confident that our methodology for identifying metrics is appropriate. Several respondents asked for further clarity on how the 5 metrics were selected, this is explained below.

#### **Methodology for selecting metrics**

At the beginning of the project we undertook a review of the energy supplier performance information already published by Citizens Advice.<sup>12</sup> We then researched other sources of energy supplier performance information not currently published by Citizens Advice. We also considered information published by other industry stakeholders. From this we created a long list of possible metrics.

The long list of metrics was evaluated internally against accessibility of data, market coverage, and importance to energy consumers. The list was refined accordingly. We worked closely with Ofgem during this process.

In parallel, we reviewed relevant existing research<sup>13</sup> to understand what factors were important to consumers when making decisions about their energy supplier. We also commissioned independent consumer research in March of this year.

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<sup>12</sup> The content within the existing Citizens Advice [energy supplier customer service tool](#) was informed by research carried out to find out what factors other than price were important to consumers when making decisions.

<sup>13</sup> Research by Citizens Advice, CMA, Ofgem, Energy UK

Focus groups with energy consumers took place in London and Edinburgh. The key findings from this research were:

- Price was the most important factor for consumers when selecting an energy supplier.
- Reputation of a supplier and ease of interacting with a supplier are highly important to consumers when making a decision.
- Consumers prefer simple information to easily compare the performance of suppliers.
- Consumers supported the idea of an independent supplier rating provided by Citizens Advice.

Our research has consistently indicated that price is a driving factor for consumers when making decisions about their supplier. However, we have decided not to include a metric related to price in the first release of the tool. Our rationale for this decision reflects our proposal to publish the overall supplier rating alongside the price results on the Citizens Advice price comparison tool. We believe that having two pieces of information related to price, one based on real-time data (on the PCW) and one based on a quarterly overview (on the comparison tool) would cause confusion when consumers use the information to inform their decisions. We do however, appreciate the importance that price has for consumers and intend to clearly signpost consumers between the Citizens Advice price comparison and the performance comparison tools.

In response to the feedback we received, we propose to keep under review the 5 metrics, and will consider what adjustments could be made to develop the tool going forward.

We received additional comments from respondents in relation to each of the metrics, detailed below.

## **Complaints**

The energy comparison project does not propose to make changes to the existing complaints metric currently published by Citizens Advice on a quarterly basis.

The Citizens Advice complaints league table ranks suppliers on the ratio of complaints made to the independent bodies.<sup>14</sup> We believe our methodology (which we consulted with industry about) for this data is robust and provides an accurate indication of supplier performance.

Over half of respondents expressed support for the inclusion of the existing complaints metric. Several respondents suggested that amendments could be made to the complaints metrics. We are grateful to the contributions made by suppliers and have carefully considered these.

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<sup>14</sup> [Citizens Advice complaints league table](#)

Some respondents suggested that direct complaints could be reflected in the complaints metric. We believe that it is an important issue to keep under review, but we do not intend to make any alterations to our existing metric at this time.

Suppliers are required to publish direct complaints data on their websites.<sup>15</sup> We plan to undertake further research in order to: A) understand whether consumers are aware of the difference between direct complaints and our existing complaints league table and B) whether including both indicators in the metric would give consumers a balanced picture of overall performance and provide suppliers with the right incentives to improve their complaints handling performance. We have included direct complaints on the list of additional metrics for further research in Section 3.5.

## **Customer service**

Over half of respondents supported the inclusion of the customer service metric and the remaining respondents expressed partial support for the metric. Several respondents, who were partially supportive, suggested that the scope was too narrow to accurately indicate customer service performance. This issue was also raised during stakeholder workshops held in the summer. A couple of respondents alternatively suggested the description of the metric could better reflect the scope.

We acknowledge suppliers' concerns about the scope and the importance of the appropriate naming of the metric.

It is our intention to keep the scope of all 5 metrics simple and clear, to ensure the information is easy to understand for consumers. We therefore do not intend to widen the scope of the customer service metric in the first instance. However, we will work with a content editor to ensure that the description of the metric is accurate and clear. Stakeholders will have an opportunity to view the new text as part of the testing phase before the tool is launched.

## **Billing**

The majority of respondents were supportive of the inclusion of the billing metric and the remaining suppliers were partially supportive. Those who were partially supportive suggested that the production of bills was an area where suppliers had limited scope to improve their performance, due to the prescriptive requirements suppliers are required to follow. Although we accept that the existing regulations require significant prescribed content to be included on energy bills, we also believe that there will be scope for suppliers to perform better or worse against

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<sup>15</sup> The direct complaints figures are not audited by individual suppliers.

these requirements. Furthermore, the implementation of the CMA remedies will allow suppliers greater flexibility in the future to make improvements to their bills.

As with the customer service metric, we will ensure that the description of this metric accurately reflects what it measures.

## **Switching**

The majority of respondents were supportive of the inclusion of the switching metric.

Following the publication of the consultation an information request was issued to suppliers in scope of the first release of the tool, outlining our data collection requirements for the switching metric.

## **Customer commitments**

A third of respondents expressed support for the inclusion of the customer commitment metric, the remaining respondents were either partially supportive or not supportive. We have found the feedback in relation to this metric to be very helpful and have decided to amend the metric for the first release in response to concerns raised by stakeholders.

A quarter of respondents told us that they did not believe the customer commitment metric would adequately reflect supplier performance. Several respondents further explained that the proposed metric would only indicate where a supplier had signed up to a code or guarantee, but not how well they performed against it.

Several respondents highlighted that due to the nature of certain codes or guarantees (e.g. associated costs of audit), this metric may unintentionally disadvantage some suppliers. A couple of respondents suggested that this could be a bigger issue for smaller suppliers, who have less available resource which would enable them to take part in a code or guarantee. Other respondents suggested that the metric would not reflect where suppliers may have equivalent processes in place, but are not signed up to a certain code or guarantee.

It was suggested by one respondent that they believed the customer commitment metric duplicated the billing and switching metrics, another suggested that it would not add value for consumers. We don't believe this to be the case, as the customer commitment metric is intended to evidence where suppliers are going above and beyond to demonstrate the standard of service provided to their customers.

Several respondents suggested additional codes or guarantees that could be incorporated into this metric. Suggestions included the safety net, prepayment principles, point of acquisition model and debt assignment protocol.

After further consideration of this metric in light of the comments received, we have decided to amend the customer commitment by removing the inclusion of the billing code but retaining the switching guarantee as a measure of performance, at a lower, fixed score. We have decided to provide a score of 3 to indicate if a supplier is signed up to the switching guarantee. An adjustment to the weighting of this metric has also been made - see Section 3.2 for further information.

We are confident that the adjustments to this metric will address the issues raised by stakeholders. We will undertake a review of this metric at a later date, at which point we will consider how additional codes or guarantees may be incorporated into the scope. Below is an example of how the scoring may work if additional elements were added to the metric. Please note that this methodology would be tested and refined accordingly.

Suppliers would score between 3 and 5, depending on how many codes or guarantees they were signed up to.

<b>Score</b>	<b>No. of codes/guarantees</b>
5	5 plus
4	2-4
3	1

If a supplier fails to perform at all against a code or guarantee they are signed up to, this would not count towards their total number.

We believe that the purpose of this metric is to indicate to consumers where suppliers are taking additional steps to demonstrate the quality of the service provided. Therefore, exact performance against a code or guarantee will not be factored into scoring unless a supplier is failing to meet the criteria of the code or guarantee.

We would clearly state which code or guarantee a supplier was scored against, from an agreed list. We believe that extending the list of applicable codes or guarantees may help resolve concerns raised by respondents, regarding the unfair advantage the originally proposed metric had given to larger suppliers.

## 3.2 Weightings

Citizens Advice included proposed weightings in our consultation. We asked stakeholders whether they agreed that the indicative weightings were an accurate representation of the importance of each metric. We were keen for stakeholders to comment on whether they thought the weightings were appropriate, and suggest any amendments that could be made.

The majority of respondents agreed or partially agreed with the indicative weightings. Those who partially agreed suggested changes to the weightings, detailed below.

### **Suggested changes**

Changes were received from several respondents in relation to the weightings for each individual metric.

Some respondents felt the complaints metric was weighted too highly and should be decreased to better reflect the number of customers who make complaints, or suggested that inconsistencies between suppliers when recording complaints meant that the weighting should be decreased. Other stakeholders suggested that the weighting should be increased due to the impact of complaints on consumers.

In relation to the customer service metric, several respondents suggested that the weighting should be increased, provided the scope of the metric was widened. Other respondents suggested that the weighting for customer service should be lowered.

A few respondents suggested that we decrease the weighting for billing, on the basis that the metric was not a good indication of performance, due to requirements suppliers are required to follow. However, other respondents suggested the weighting for billing should be increased to the most highly weighted metric, to reflect how important this is to consumers.

Several respondents suggested that the weighting for the switching metric should be increased, because they felt this was important information for consumers to consider when choosing an energy supplier. One respondent suggested that the weighting for complaints and switching should be balanced, to reflect that both areas of performance could have a comparable level of impact to consumers.

It was suggested by a few stakeholders that the customer commitment metric (in its current form) should not be assigned a weighting at all.

### **Final weightings**

Reflecting on comments received, we have decided to amend the weightings for the comparison tool as follows:

Weighting	Complaints	Customer service	Billing	<b>Switching</b>	<b>Customer commitment</b>
<b>Final proposal</b>	30%	25%	25%	<b>15%</b>	<b>5%</b>
Proposed in consultation	30%	25%	25%	10%	10%

We agree with respondents that the switching metric could better reflect the importance of switching for consumers, and we have raised the weighting accordingly.

The weighting for the customer commitment metric has been decreased to reflect the reduced scope. We also believe that the change to the weighting will address concerns expressed by some respondents about the applicability of the customer commitment to suppliers of different sizes.

We have carefully considered all the feedback received on the indicative weightings. In our consultation documents, we asked respondents to provide evidence or research to support their proposed amendments. Other than the amendments explained above we did not receive sufficient evidence during the consultation process that would justify further changes to the weightings for the first release.

We would like to re-iterate our rationale for assigning the complaints metric weighting. Complaints remain slightly more heavily weighted, as consumer surveys<sup>16</sup> undertaken in recent years have indicated that supplier complaints volumes do influence a consumer's decision when selecting a supplier.

### 3.3 Market coverage

For the first release of the energy comparison tool we have proposed publishing metrics and an overall rating for 17 domestic energy suppliers, those with a customer base of 150,000 or more. Our decision regarding market coverage for the tool has been determined by the availability of representative data. Our consultation asked stakeholders to comment whether they supported our approach to market coverage.

<sup>16</sup> Research reference in Section 1.1 (footnote 5)

Over half of respondents told us that they were not supportive of our intention to release the comparison tool for only the 17 suppliers we have sourced representative data for. Just less than a third of respondents were in support of the proposal, and the remaining respondents were partially supportive. Those that were partially supportive suggested that the coverage wasn't their preference, but that they agreed with the decision to only include representative data within the tool's first release.

A main concern for respondents, who did not support our proposal, was that partial market coverage in favour of larger suppliers may distort the market for consumers. Other respondents suggested the project timeline should be revised and the tool launched when wider market coverage was possible.

We appreciate stakeholders raising concerns about the market coverage for the first release of the comparison tool. We understand respondents' concerns that limited market coverage could have implications for consumer awareness of performance of the wider market. However, we believe that appropriate messaging as part of the comparison tool will clearly explain to consumers why certain information is not yet available. The decision to initially release the tool with partial market coverage reflects our intention to improve our current offering of performance information, which currently covers less suppliers and in a format that is not easily accessible to consumers. It is a priority for improvements to be made to our current information, which we are confident the energy comparison tool can deliver, and then for further improvements to follow.

Market coverage of the energy comparison tool will grow alongside the growth of suppliers. The second release of the tool is expected to include data for an additional 2 suppliers. It is our intention to undertake further work to explore how best to expand the tool's market coverage.

### 3.4 Scoring methodology

We asked stakeholders to comment on our proposed scoring methodology.

#### **Scoring definitions and criteria**

The majority of respondents told us that they supported our proposed scoring definitions and methodology, and some suggested minor amendments. Several respondents said that they did not support the proposed approach.

Several respondents provided general feedback, such as reiterating the need for clear and simple explanatory text about the methodology for consumers, and the importance of showing suppliers' actual scores. We agree with both these points. We intend to provide a clear explanation of methodology and will publish the actual scores achieved by suppliers.



Several respondents told us that they felt the scoring for switching was too high and should be lowered so that the highest performing suppliers are able to achieve a score of 5. Although we expect performance against this metric to be high, we also agree that it is important to reflect where suppliers are performing best against the metric, and the current requirements for a score of 5 (all switches completed in 21 days) may be difficult for a supplier to meet. In response to concerns raised we have decided to adjust the switching metric scores as follows.

Score	Proportion of switches completed in 21 days (including switched delayed for a valid reason)	
	<b>Final proposal</b>	Proposed in consultation
<b>5</b>	<b>98% plus</b>	100%
<b>4</b>	<b>90% - 97%</b>	95% - 99%
3	75% - 89%	75% - 89%
2	50% - 74%	50% - 74%
1	Less than 50%	Less than 50%

We also received comments from respondents about the scoring in relation to the customer commitments, and that it could better reflect performance. Section 3.1 explains how we will address these concerns.

### **Overall supplier score**

The energy comparison tool will collate a supplier’s performance against the 5 metrics into an overall score out of 5. We have proposed to round supplier scores to the nearest quarter, in order to show sufficient granularity, while remaining clear enough for consumers to understand. Our consultation asked stakeholders whether they supported this approach. The majority of respondents supported this approach, with just a couple of respondents calling for additional granularity.

In addition to the original proposal to rate suppliers by their rounded score out of 5, we have since decided to add an additional rank based on the exact scores in order to show further granularity. This rank would be similar to the rank we provide on our existing complaints league table,<sup>17</sup> but would be based on performance against all 5 metrics. We believe that this would add value and allow consumers

<sup>17</sup> [Citizens Advice complaints league table](#)

and stakeholders to differentiate between performance in instances where the same overall score has been awarded to more than one supplier.

### **Alternative scoring methodology**

As part of our section on scoring within our consultation, we presented an alternative scoring criteria to our initial scoring criteria, and asked stakeholders which approach they preferred. The majority of respondents told us they supported the initial scoring criteria over the alternative, as is it more objective, impartial and fair. We agree with respondents and do not intend to change the scoring criteria.

A few respondents suggested alternative scoring methodologies. We are grateful for the contribution made by suppliers and have carefully considered the suggested ideas. We are confident that our initial scoring methodology is suitable.

## **3.5 Additional metrics for consideration**

Our consultation asked stakeholders which metrics they thought should be considered for future releases of the energy comparison tool. We specifically asked about performance metrics for the average speed to answer telephone calls and the accuracy of switching based on numbers of erroneous transfers. We also listed additional metrics that could be considered for a future release of the tool and asked stakeholders to suggest additional metrics to be added to the list. The intention of these questions was to gain a better understanding of what areas we should consider researching further.

### **Average speed of answer**

Over half of respondents support the inclusion of a metric based on the average speed of answer. Most of these respondents supported this metric on the condition that a suitable methodology was used to measure performance. Over half of respondents who were supportive suggested that the metric could be improved if it covered other contact channels (e.g. email), to better reflect how suppliers communicate with their customers.

A third of respondents were not supportive of this metric. A few reasons were provided, for example - it was suggested that a measure of call quality was preferable over a quantitative measure of performance. Other respondents suggested that different technologies used by suppliers would impact on how consistently this metric could be measured.

### **Accuracy of switching**

The majority of respondents were not in favour of the inclusion of a metric about the accuracy of switching based on the number of erroneous transfers.

Most of those respondents, who were not in favour, highlighted that it would not be suitable on the basis that multiple factors, many outside the control of suppliers, can lead to inaccuracies or inconsistencies in measuring erroneous transfers and subsequently assigning blame. Others suggested that erroneous transfers rarely occur and that the benefit of this information to consumers was limited.

There were a few respondents who were in support, suggesting that it was important information and a key area for suppliers to ensure they performed well. A couple of stakeholders told us that although they believed this to be an important area, the comparison tool may not be the right place to help improve performance in this area. Other stakeholders suggested that a better measure may be how well suppliers manage switching and issues that arise.

### Further suggestions

We received the following suggestions regarding additional metrics.

Category	Metric
Complaints	Direct complaints
Customer satisfaction	Overall customer satisfaction i.e. use of supplier survey or net promoter score data
	Recommending a supplier
Customer service	Customer contact centre performance
Billing	% of bills based on meter readings
	Billing accuracy and timeliness
Vulnerable customers	Quality of service for vulnerable customers
Smart	Supplier readiness for smart meter rollout
	Smart billing performance
Switching	Customer record keeping, to prevent future switching problems

Information / guidance	Quality of information provided about reducing energy consumption
Guaranteed standards	Guaranteed standards
Fuel mix	Indication of supplier fuel mix
Other services	Initiatives / investments undertaken by suppliers, funded by customers bills  i.e. supplier funded community initiatives / investment in renewables
	Performance of online services

We will carry out a review of the comparison tool once it has been live for 6 months, which we will invite suppliers and stakeholders to take part in. We will consider additional metrics as part of this process.

## 4. Project milestones

<b>Project activity</b>	<b>Date 2016 - 2017</b>
Design and development of tool	Ongoing
Testing with stakeholders	18 October - 31 October 2016 (can continue into November if required)
User research with consumers	Mid - end October 2016
Deadline for switching information request	28 October 2016
Data checking and assurance period	28 October - 15 November 2016
Final publication shared with suppliers in scope of first release	15 November - 22 November 2016
First release on Citizens Advice website (soft launch)	Early December 2016 (exact date to be confirmed)
Overall score published on Citizens Advice PCW	Early December 2016 (exact date to be confirmed)
Evaluation of first release to start	Early December - end February 2017
Second release on Citizens Advice website	Early March 2017
Overall score publish on external PCW (dependent on appetite)	Early March 2017
6 month evaluation (including review of metrics and market coverage)	May-June 2017