



24 February 2010

Clare Lucas  
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Dear Clare

### Measuring energy supplier performance - consultation

Thank you for the opportunity to respond to Consumer Focus's consultation on measuring energy supplier performance. The Consumer Council for Water (CCWater) represents the interests of water and sewerage customers across England and Wales. We have four regional committees in England and a committee in Wales.

CCWater welcomes Consumer Focus's proposal to measure performance of the energy sector quantitatively and qualitatively. There are similarities between Consumer Focus's proposed measures with Ofwat's Service Incentive Mechanism (SIM), which begins in April 2010.

We helped Ofwat and the water industry originate this more consumer focused incentive and pressed Ofwat to move away from their previous Overall Performance Assessment (OPA) and adopt a more consumer focused incentive. We think that SIM is a good start. However we recommended that Ofwat introduce a higher penalty for water and sewerage companies who deliver a poor customer service.

Consumer Focus's proposal to measure energy supplier performance will provide more transparency to consumers rather than just through price comparison between energy providers. If there is nothing already in place to compare consumer complaints in the energy market, this would provide an additional means for consumers to see the performance of their energy supplier or choose a new supplier. We would be interested to know what role, if any, Ofgem will have in the new measure.

Although we would need to be careful to note differences between the energy and water industries, the information from your proposed measures will also allow us to compare the water and energy industries. This can support other areas of benchmarking such as consumer satisfaction with service and value for money which we track in our Annual Customer Tracking Survey.

We look forward to continuing to develop our working relationship with Consumer Focus and to exploring ways both industries can improve and share best practice.

Yours sincerely

Carl Pegg  
Head of Consumer Relations