

Scottish & Southern Energy

Consumer Focus Consultation – Measuring energy supplier Performance

Q1. Please state which types and combination of the following quantitative measures you think best reflect industry performance and your reasons for this.

- Direct complaints

Whilst we appreciate the difficulties in achieving consistency in the recording of complaint data, we believe direct complaint numbers provide vital information. As suppliers, we should continue to work together and should welcome independent audits to help bring consistency across the board.

- Company Referrals from Consumer Direct

We agree that Consumer Direct can provide independent insight and whilst there are some concerns amongst suppliers about the lack of a dispute process for incorrectly categorised cases, we do not feel this is a major issue as we believe these cases will be in the minority and all suppliers will be in the same position.

- Repeat Referrals from Consumer Direct

We have had very few repeat referrals from Consumer Direct but agree these reflect performance and should be included.

- Complaints handled by the Consumer Focus Extra Help Unit

It is clear this measure should be included, but we do have some concerns over the number of cases which relate to customers involved in the theft of electricity and would welcome to opportunity to discuss further the categorisation of these cases.

- Cases referred by the Energy Ombudsman

We believe those cases which have exceeded 8 weeks could be included to reflect performance but not those cases which have reached deadlock. Also, we believe some consideration should be given to discounting those cases where the Ombudsman's final decision does not require any additional substantial award or requires the supplier to take any additional action.

SSE welcomes the fact that Consumer Focus are keen to avoid any unnecessary burden of further measures and believe the above complaint types will provide a realistic and fair measurement.

Q2. Please state whether you think the following measures should have a greater or lesser weighting and your reasons for this.

Firstly, we do not believe there is a major benefit in weighting direct complaints resolved within and outwith 1 day and feel that simply the total number of direct complaints received will provide meaningful information. (Supplier already publish some information on our own websites relating to complaint resolution outside D+1)

It is sensible to give slightly more weight to the repeat direct complaints and make this the same as Company referrals from Consumer Direct, given we know that some of these customers have not contacted their supplier prior to contacting Consumer Direct. Repeat Company Referrals should be weighted slightly greater again but we do not believe 'Advice only' cases to Consumer Direct should be included in the measures at all.

Consumer Focus Extra Help Unit complaints should carry a greater weight than Consumer Direct Referrals as those customers should already have given their supplier an opportunity to resolve their issue. As mentioned in Q1 however, we would be keen to discuss further those cases involving theft of electricity.

Finally, Energy Ombudsman (over 8 weeks) cases should carry the greatest weighting of all the case types, but again, consideration should be given to those where the Ombudsman's final decision does not require any further action from the supplier or any additional substantial award.

Q3a. Consumer Focus seeks views on which option would provide the most accurate picture, how you think it should be funded and how the customer satisfaction measure should be incorporated into the model; for example, as a standalone measure or as a positive metric as part of the overall ranking calculation.

Given the existence of uSwitch, Which? And JD Power Customer satisfaction survey data, as well as OFGEM's annual customer satisfaction research, we would question whether another customer satisfaction survey will be necessary. However, we do believe existing survey data should be included, but as a positive stand alone measure.

Q3b. Consumer Focus seeks views on whether any additional qualitative indicators should be included in order to provide the best possible information in customer service for consumers.

We believe the indicators listed in question 1 will be sufficient to provide meaningful information for consumers and we agree with Consumer Focus that we should avoid any unnecessary burden on suppliers to provide more data than is already collected.

Q4. Consumer Focus seeks views on what types of positive indicators would best reflect supplier performance and be useful to consumers. Additionally do you think these indicators should be combined with the complaint data or provided as a stand alone measure of performance?

As explained in Q3a, existing customer satisfaction data would be helpful as a positive stand alone measure of performance. Further discussion about positive indicators is due to take place between suppliers at the planned ERA workshop on 9th March and therefore it is possible that other ideas about positive indicators may arise thereafter.

In the meantime, although we agree quick resolution may appear a positive indicator to consumers, whilst the definition of resolution remains open to interpretation, this may not be appropriate.

Q5a. What performance information do you think should be published on the nine smaller suppliers? Should this information be combined with that of the big six or shown as a standalone measure separately?

We would agree with Consumer Focus' concerns about the risk of confusion for consumers by combining the nine small suppliers and would suggest a standalone measure separately would help customers to make a balanced comparison.

Q5b. What performance information on business suppliers do you think Consumer Focus should provide for micro-business consumers? In what ways do you think it should differ from the provision for domestic consumers?

We do not believe the information provided to micro-business customers should differ and should be presented in the same format to keep consistency.

Q6. In what format do you think the performance information should be displayed to ensure it is easily understood and useful to consumers?

The simplicity of the current interim measures gives consumers a clear picture of how the suppliers compare and we believe similar graphical data will ensure consistency and make the process of comparison as straight forward as possible for consumers. However, it will be interesting to learn from the research which Consumer Focus intends to carry out what consumers find most helpful.

Q7a. How often do you think the performance information should be updated?

We believe monthly or quarterly presentation of data will allow consumers to keep up to date on the performance of suppliers and would be in line with monthly/quarterly returns already currently provided to both Consumer Focus and OFGEM.

Q7b. Excluding the Consumer Focus website, where do you think links to the information should be displayed to ensure as many consumers as possible can access the information?

We believe that displaying this information on suppliers and Consumer Focus' website would be sufficient, but would have no objection to it being displayed on the Energy Ombudsman or Consumer Direct website also.

Q8. Please provide any further examples of best practice you think should be adopted from other sectors.

We believe more regular publication of data will benefit consumers, rather than 6 monthly reports like in the water and financial sectors and therefore believe the energy sector should lead the way in utilities in terms of informing consumers about provider performance. (We note that OFCOM are currently consulting on improving publicly available information on complaint handling in the industry and their ideas are similar to those already in place for energy)

Q9. While Consumer Focus hopes to have covered the current and relevant issues within this document, please let us know if you have any additional comments or issues you would like to raise.

We believe the questions outlined in this consultation should allow Consumer Focus to gather a broad range of opinions on this subject and we look forward to working with Consumer Focus to reach a model which will indeed accurately illustrate company performance to give consumers access to the information they need.