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1 March 2010

Dear Clare,

**Consumer Focus consultation: Measuring energy supplier performance**

Thank you for your e-mail of 15<sup>th</sup> January 2010 asking for comments to your consultation on energy supplier performance.

ScottishPower welcomes this opportunity to respond to an essential piece of work for energy customers, recognising they need appropriate and accurate information about their chosen supplier.

We fully appreciate Consumer Focus has started work in a period during which the energy industry is under more public, political and media scrutiny than ever before. Within this environment, we recognise that Consumer Focus has a crucial role to play in creating confident, empowered and, perhaps of most fundamental importance, accurately informed consumers.

As always, we are willing to work collaboratively with the other industry stakeholders on this important matter going forward, as we recognise the need for the energy sector to make a significant shift if we are to take on the challenge of delivering a world class customer service experience.

We also believe that Consumer Focus can significantly contribute to this challenge, through the use of timely, accurate and evidence-based information. This will allow companies to recognise the true value in the measure being applied and will therefore strive to improve performance, as they will have confidence in the robustness of the process used to assess their own performance and that of their competitors.

Our views on the points raised within your consultation are set out in more detail in the attached Annex, however in summary:

- We fully support, subject to a number of critical dependencies being addressed, the 4 key areas being proposed for inclusion in the balanced scorecard, namely:
  - “Direct” complaints;
  - Consumer Direct cases;
  - Consumer Focus cases;
  - Ombudsman cases.

- Within these metrics, we have some reservations over some of the proposed sub-metrics, and the associated weightings, in terms of allowing accurate comparisons between suppliers and in highlighting key issues of supplier performance for consumers.
- We have therefore provided an alternative set of sub-metrics and weightings for consideration, with a rationale as to why we believe they are the right measures for customers, consumer bodies, and industry stakeholders alike.
- In contrast to the real consumer value associated with accurate, transparent performance reporting, we continue to believe that the interim reporting measures provide an unreliable reference point for consumers. In recognition of the strong work that Consumer Focus has presented under this consultation we would request that the interim reporting measures be immediately removed from the public domain.

We strongly recommend that not too high a weighting be applied to direct complaints. We believe that this measure is still subject to many interpretational differences, and any over-representation of it would seriously distort the balanced scorecard. We consider higher weightings on cases from independent, 3<sup>rd</sup>-party organisations like Consumer Direct, Consumer Focus and the Energy Ombudsman will result in a more accurate picture for consumers.

If you would like further details on any aspect of the content please do not hesitate to contact me.

Yours sincerely,

Colin Gilchrist  
Operations & Customer Services Director

## **Scottish Power**

### **Annex**

#### **Measuring energy supplier performance – ScottishPower Comments**

##### **Section 1 – Quantitative measures**

###### **1.1 Direct complaints**

ScottishPower fully recognises the work conducted by the Customer Journey Working Group (CJWG) in pulling together the Complaint Handling Standards, designed to bring consistency to the way energy companies log and monitor direct complaints, and therefore enhance the experience for customers. As such, we agree that the inclusion of direct complaints in the proposed balance scorecard is correct.

Importantly however, evidence from Ofgem’s complaint reports, and minutes from the January meeting of the CJWG, suggests there are still considerable interpretational differences in recording and managing direct complaints across the main suppliers. The key areas of concern are around:

- the definition of a complaint
- when a complaint can be closed
- when a complaint should be re-opened as opposed to logging a new complaint.

With these significant differences still apparent, it highlights the importance of ensuring that any proposed direct complaints metrics are robust and reliable, so as not to allow interpretational differences to obscure the customer’s perception of supplier performance.

Therefore, whilst these interpretational and working practice differences continue, ScottishPower does not believe the customer would be getting meaningful information if the industry were to introduce the three proposed metrics on direct complaints.

ScottishPower is, however, of the strong view that some measure on direct complaints be included, although we are not confident that the metric proposed within the consultation is suitable for the current circumstances. We have therefore proposed an alternative metric to address these concerns, with a suggestion that it can be reviewed and enhanced once the industry is confident enough with the way all suppliers are identifying, logging, resolving and monitoring customer complaints.

Indeed, any other proposal to include volumes/total complaints is equally not applicable at this moment in time.



## **ScottishPower Proposal**

Given the inconsistencies still evident across the industry since the introduction of the Complaint Handling Standards, ScottishPower considers monitoring and reporting on response times to be the best metric. Customers undoubtedly would be interested to know if complaints are handled quickly, however, not to the detriment of quality. We would therefore propose the following:

- ***the number of direct complaints (per 100k customers) outstanding > 10 working days.***

ScottishPower proposes that this new metric gets a weighting of **5%**, which is explained more fully in Section 2.

The proposed “+1 day” target provides too much focus on numbers that are skewed by reporting differences and/or inaccuracies, whereas a “+10 day” target would still give a strong overview of suppliers’ immediate performance in handling cases, but avoid such a focus.

The importance is in striking a balance between quantity and quality, and this revised metric would allow companies to put more emphasis on providing a quality response to customers, knowing that they weren’t failing a key industry metric, whilst still ensuring a robust and comparable reporting metric for consumers.

As with all suggested metrics, customers will want confidence that the data being reported is accurate, therefore, there are a number of critical issues that must be addressed in order for the metrics to be reliable, particularly in the longer term and if any of these metrics are being reviewed. In particular, for any performance measure on direct complaints, all suppliers must perform consistently to the industry agreed definitions for:

- ‘what is a complaint’;
- ‘when to close a complaint’ and
- ‘when to re-open an old case versus open a new one’.

We would welcome the input of Consumer Focus in driving the industry towards this goal.

### **1.2 Cases received by Consumer Direct**

ScottishPower fully appreciates the value of the independence of an organisation like Consumer Direct, and the support they provide to energy customers.

Our view is that their presence within the industry structure actually enhances the overall customer experience. However, we welcome the recognition that Consumer Direct’s involvement in providing help and advice to energy customers is not necessarily always an indication of an energy company giving poor service to their customers’.

Many customers use Consumer Direct's service to get confirmation of what their supplier has said or done, or to seek clarification on a matter that they feel an independent body such as Consumer Direct can provide.

This offer of assistance for customers who choose this route, is well conveyed on their website – “Consumer Direct provides clear, practical, consumer advice”. Then specifically for energy, Consumer Direct help customers across a range of questions including “what do I do when I'm moving home?” to “am I paying the right price?” to “can I change to a credit meter?”

The volume of contacts to Consumer Direct will be heavily influenced by the clarity, visibility and prominence of consumer signposting, so will not necessarily be a direct reflection of service standards. That is not to say that any of the current signposting techniques used by the suppliers are wrong or inappropriate. However, these techniques do significantly impact the volume of contacts received, and hence negate the value of this data in isolation as a measure of service performance.

A flat volume metric would also not account for factors influencing the customer choice of contact, including geography and the customer's personal preference. For example, customers living near a CAB office may not necessarily choose Consumer Direct for help or advice. Then for customers with internet access, they do not have to speak to a Consumer Direct advisor, when they can access the necessary information from the relevant page in the Q&A section of their website.

We therefore would not have confidence in a metric that reflects customer decisions that are determined by factors such as geography and technology and do not agree that these should be measured in an industry league table where it may present a falsely negative position of supplier performance.

### **ScottishPower Proposal**

We would therefore propose that “contacts received by Consumer Direct” are not included in the balanced scorecard. We would continue to see Consumer Direct complaints being referenced in the subsequent metrics, but in a balanced way that reflects the actual performance of the supplier in relation to energy complaints.

### **1.3 Company referrals from Consumer Direct**

The inclusion of Consumer Direct cases within the overall balanced scorecard is the right approach. For valid cases, customers referred to their supplier, is a correct metric.

### **ScottishPower Proposal**

ScottishPower fully supports the proposal to monitor and report on:

- ***the number of “company referrals” (per 100k customers).***

ScottishPower proposes that this new metric gets a weighting of **10%**, which is explained more fully in Section 2.

However, for customers to be confident in basing any decisions, such as whether to change supplier, on the complaints scorecard, they will undoubtedly want confidence in the data being presented, therefore the accuracy of this measurement has to be 100%. At present, we do not believe that this is the case. We believe that the number of cases currently being registered correctly against each supplier can be inconsistent and therefore would not stand up to the rigors of a quality audit.

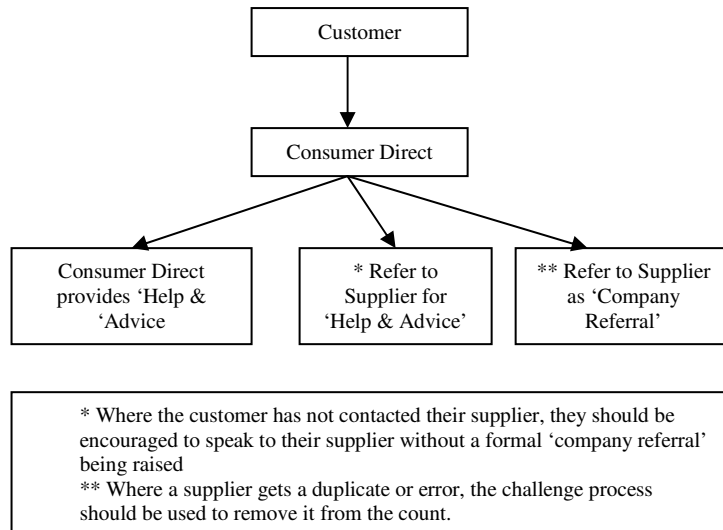
We feel significant reporting improvements are necessary to make this metric accurate and meaningful, and we would welcome the support from Consumer Focus in helping the industry address the following points:

- Logging Errors:  
Consumer Direct's IT systems are currently not able to change errors in logging, for example, to change a referral to the correct supplier if originally it was allocated to a wrong supplier or to remove a Consumer Direct case when a duplicate Consumer Focus case has also been raised (this tends to occur when the Consumer Focus office is closed after 5pm during the week and the weekends). These issues skew the actual results against suppliers and therefore need to be rectified.
- Challenge Process:  
Companies should have the security of a robust challenge process for cases that are wrongly allocated, or are duplicates. Currently this is not in place and leads us to have some concerns about the reliability of the data as a consumer metric. Such a process must also provide feedback to companies to confirm the outcome of that challenge, and reassure where necessary, that the errors have been corrected in the numbers.

If suppliers are to be held accountable for performance - and it is right that they are - it stands to reason that the numbers being reported are robust. We would be happy to discuss our concerns here, with examples, in more detail with Consumer Focus.

ScottishPower are willing to work with the relevant industry stakeholders to devise and implement a robust, workable challenge process, and/or help review the industry categories to develop an "exemption from reporting" list.

The model below describes how Consumer Direct could filter cases before passing them to suppliers, with the added inclusion of a challenge process to remove examples where the company cannot be held accountable.



- **Category Errors:**  
There is a need to review and remove any categories not associated with suppliers' activities, for example "DT: distribution/transportation". Suppliers cannot be held responsible for activities outwith the scope of their business over which they have no control.
- **Protocols:**  
The accuracy and fairness in the numbers will also be reliant on the consistency in the protocols held by Consumer Direct for each supplier. Recognising that this is commercially sensitive information, ScottishPower would like to propose that an independent review of all protocols is undertaken by Consumer Focus to ensure similar cases for all suppliers will be treated the same.
- **Information Reports:**  
In order to enable suppliers to learn from their customers' experiences and improve their service, suppliers need an insight into all the cases recorded by Consumer Direct. Examples of the type of information that could aid this would be:
  - a) call reason categories for all contacts to Consumer Direct, not just those passed as "company referrals";
  - b) profile of all calls to Consumer Direct so companies can mirror customers' calling patterns to ensure staff are available where possible to take priority calls by mid-call transfer (MCT).

ScottishPower welcomes the recent provision of weekly information from Consumer Focus, and would like this service enhanced to enable ad-hoc reports to be requested when necessary, in order to assist us in providing the best possible service to our customers.

#### **1.4 Repeat company referrals from Consumer Direct**

Our agreement to include “company referrals from Consumer Direct”, logically leads to the inclusion of a metric to highlight “repeat company referrals from Consumer Direct”. Again this would be reported on a ‘per 100,000 customers’ basis.

These cases are amongst the easiest to monitor in that there is evidence logged of a valid “company referral” being sent to a supplier, enabling Consumer Direct to report on the number of cases where customers have to make a repeated call because their supplier has failed to get in touch and/or provide a resolution.

The proposal to include this metric is important for the customer, as there is a clear indication of poor service when the issue is not resolved on the first referral.

### **ScottishPower Proposal**

ScottishPower fully supports the proposal to monitor and report on:

- ***the number of “repeat company referrals” (per 100k customers).***

ScottishPower proposes that this new metric gets a weighting of **15%**, which is explained more fully in Section 2.

Again, in order to ensure that this metric is as reliable as possible for customers, there are a couple of critical issues that must be addressed to make this metric accurate. We would welcome Consumer Focus’ support in resolving the following:

- Protocols:  
Companies must be given a fair opportunity to respond to the first referral, as per the time-period specified in their protocol for dealing with “company referrals”, specifically Consumer Direct should only submit a “repeat company referral” if the date of the “company referral” is > 5 working days previously.

ScottishPower has received examples recently where “repeat company referrals” have been passed within a couple of days of the original “company referral” which does not allow ScottishPower adequate time to consider the issue.

- Challenge Process:  
As with initial referrals from Consumer Direct, we would welcome development of a challenge process that would allow the supplier to address cases that are wrongly allocated or duplicated against the supplier. We would expect this process to extend to repeat referrals where the circumstances of the referral are outwith the control of the supplier, and where the supplier has done everything it can in the interim to manage the customer’s issue. This would allow a supplier to challenge a case that it feels has resulted in an unfair repeat referral, and bring greater reporting confidence to stakeholders.

ScottishPower would be willing to take part in industry discussions to consider this process change and also to look at other options that could prevent such issues occurring in the first instance, such as utilising mid-call transfers for repeat contacts.

## **1.5 Complaints handled by the Consumer Focus Extra Help Unit**

ScottishPower recognises that the customers who seek the services of the Extra Help Unit in Glasgow, for the most part, need the additional support of the Consumer Focus advisors and the assistance of a supplier's specialised escalation team.

For that reason, we consider your proposal to include a metric on the number of Extra Help Unit cases in the balanced scorecard to be correct.

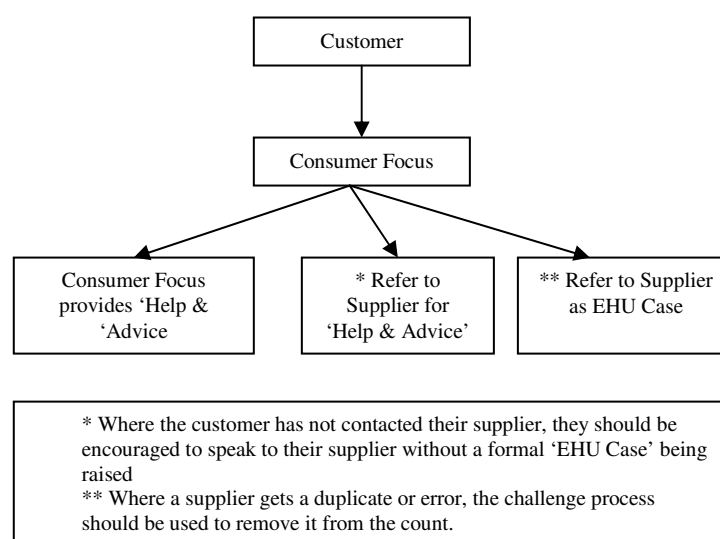
### **ScottishPower Proposal**

ScottishPower fully supports the proposal to monitor and report on:

- ***the number of "EHU cases" (per 100k customers).***

ScottishPower proposes that this new metric gets a weighting of **30%**, which is explained more fully in Section 2.

The model below describes how Consumer Focus could filter cases before passing them to suppliers, with the added inclusion of a challenge process to remove examples where the company cannot be held accountable.



Recognising that Consumer Focus will not refuse to accept a potentially vulnerable case from Consumer Direct, there are a number of critical issues that we feel should be addressed in order to provide customers with a true picture of supplier performance against this metric. We would ask to work with Consumer Focus to address the following:

- Challenge Process:  
As for certain Consumer Direct cases, there has to be a robust industry challenge process to remove any case that a supplier cannot be held responsible for. Examples would be:

- customer who claims they have been unfairly disconnected, yet when the EHU case is received, the facts show the supply was disconnected for meter tampering;
  - “force-majeure” events like where gas engineers are unable to make visits due to adverse winter weather, yet suppliers are still held responsible for EHU cases they are unable to avoid.
- Exemptions:  
A proposal that would dovetail with the challenge process would be the creation of a list of agreed exemptions to factor out extreme situations, or individual cases where the customer’s true circumstances are not apparent. This automated removal of cases would remove the need for suppliers to raise a challenge for events/circumstances the industry has agreed should not be included.

Another group that we agree should not be in the reported metrics is cases where the customer has not previously raised the issue with the supplier. Consumer Focus have cited this in the consultation paper, and it is something we concur with, as we believe that only by excluding such cases will the customers get an accurate measurement by which to assess service levels.

- Bi-Lateral Engagement:  
Amongst the cases suppliers receive each week, there are cases categorised as “complexity”; “personal circumstances” and “other urgent issues”. Like all suppliers, we want to improve our service levels, therefore we would very much welcome working with Consumer Focus on understanding what types of cases fall into these categories, and help us identify the “vulnerability” aspect when we first deal with the customer.

## **1.6 Cases received by the Energy Ombudsman**

The Energy Ombudsman is now an integral part of the energy market, assisting both customers and suppliers to resolve difficult cases.

ScottishPower would not support any proposal to include all Ombudsman cases in the balanced scorecard, as there are certain cases where suppliers will have no alternative but to issue a “deadlock” letter.

We very much however support a metric that counts the cases the Ombudsman receives that have not been “deadlocked”. This type of case is very often reflective of poor customer service if the customer is not being managed or updated regularly, and there is justification on suppliers being measured on their performance in this area of work.

### **ScottishPower Proposal**

ScottishPower therefore proposes the following metric be included within the scorecard:

- ***the number of “Ombudsman cases” (per 100k customers) that are complaints > 8 weeks old and no “deadlock” letter has been issued***

ScottishPower proposes that this new metric gets a weighting of **20%**, which is explained more fully in Section 2.

The key factors that must be addressed in order to ensure the success of this metric are:

- Independence:  
The reporting of the information for this metric must come from the Ombudsman – their independence is crucial for the integrity of the numbers.
- Request for “deadlock” letter:  
In all instances, the Ombudsman would need to ask customers to provide a copy of the “deadlock” letter when registering their case, to allow for verification and auditing around this metric. Otherwise suppliers will produce a copy of their “deadlock” letter in their evidence to challenge the inclusion of certain cases in the measurement of performance.

### **1.7 Other quantitative complaint data**

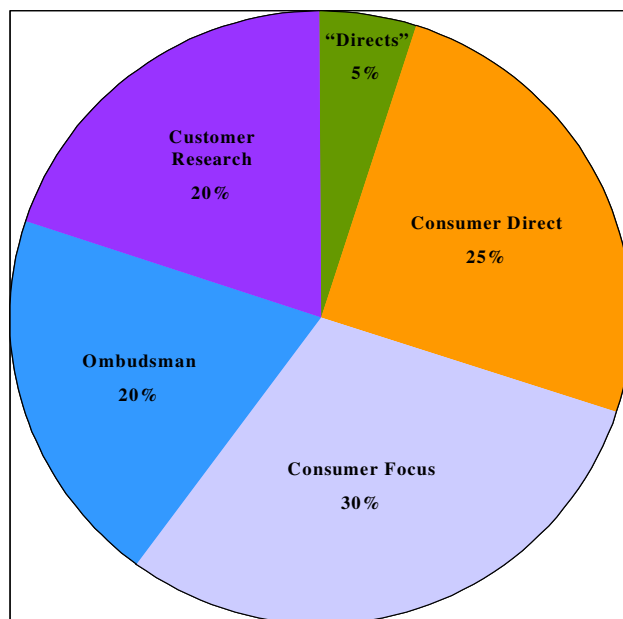
ScottishPower do not consider other quantitative complaint data to be necessary.

#### **Section 2 – Weighting of quantitative measures**

Whilst recognising that the weightings provided in the consultation paper are for illustration purposes only, ScottishPower believe it is important that a robust, coherent rationale be the basis for how the exact weightings are determined.

ScottishPower propose using 100% as the starting point, as it is easier to understand the weightings that are allocated to each metric within the balanced scorecard.

#### **The Proposed ScottishPower weightings:**



Our suggestion, with the clear understanding that all the dependencies listed have to be addressed, is that:

Direct complaints:

**Metric: the number of direct complaints (per 100k customers) outstanding > 10 working days**

Weighting: While still an important aspect of supplier performance, direct complaints are an expected part of ongoing customer service and will not necessarily indicate the same level of service issues for customers as a referral from Consumer Direct or Consumer Focus. Therefore, as we feel that it is important to give these types of referral a larger weighting, it will be proportionately appropriate to give this metric a relatively small (5%) weighting in comparison. This will also help to resolve potential interpretational issues across all suppliers, which otherwise mean that less reliance can be put on the numbers being reported.

### Consumer Direct:

**Metric: the number of “company referrals” (per 100k customers)**

Weighting: We would give this metric an individual weighting (10%) to signify the importance Consumer Direct has in the industry for highlighting the cases suppliers should be learning from.

Metric: the number of “repeat company referrals” (per 100k customers).

Weighting: We would award this metric an individual weighting (15%) to highlight the importance for suppliers to respond to the original referral within the agreed timescales in their protocol.

### **Consumer Focus:**

**Metric: the number of “EHU cases” (per 100k customers)**

Weighting: We would propose the highest weighting (30%) to indicate the importance ScottishPower and other companies should be placing on our vulnerable customers.

### **Energy Ombudsman:**

**Metric: the number of “Ombudsman cases” (per 100k customers) that are complaints > 8 weeks old and no “deadlock” letter has been issued**

Weighting: We would propose a high weighting (20%) to reflect that complaints need to be well managed, particularly when they are subjected to elongated industry processes.

### **Customer Research:**

**Metric: independent customer research**

Weighting: We believe that customer research scores should be awarded a considerable weighting (20%) as an indication that numbers are not always the true measure of performance, and that the customers themselves are best placed to give the true indication as to whether suppliers recognise and deal with complaints well.

A worked example using ScottishPower’s proposed weightings:

Supplier X (All measures are per 100k customers)		No. of Cases (Score for Customer Research)	Secondary Weighting	Score (No. of Cases x Secondary Weighting)
Primary Metric & Weighting	Secondary Metric			
“Direct” Complaints 5%	% age of “direct” complaints o/s after 10 working days	600	5%	3,000
Consumer Direct 25%	No. of “company referrals”	100	10%	1,000
	No. of “repeat company referrals”	5	15%	75
Consumer Focus 30%	No. of EHU cases	80	30%	240
Ombudsman 20%	No. of cases that were not “deadlocked”	30	20%	600
<b>Sub Total</b>				<b>4,915</b>
Subtract: Customer Research Score 20% (Top mark 50, i.e. 5 x 10 per question)		40	20%	800
<b>TOTAL</b>				<b>4,115</b>

Total \_\_\_\_\_ x  $\frac{100,000}{\text{No. of Customers}}$  = Ratio per 100,000 customers

$\frac{4,115}{5,000,000} \times 100,000 = 82.3$  (lowest score being the No.1 supplier)

### **Section 3 – Qualitative measures**

ScottishPower does not agree to the use of the Which or Uswitch results as an indicator for this topic of utility work.

The outputs capture much more than just complaints, and whilst these may provide an important commentary on aspects of the retail market, it will be vital that the qualitative measures provide a more specific complaint-related set of quality statistics.

We also believe that the qualitative measures used in the balanced scorecard remain robust, independent and consistent, to provide reliable support to the wider scorecard. We believe that the best way to achieve this for all stakeholders would be to commission a separate piece of work to assess customer perceptions. It would also be beneficial for suppliers to have some level of input into this work, which is not currently achieved through existing reports.

## **ScottishPower Proposal**

ScottishPower considers there to be two suitable options for a complaint-orientated survey:

**Option 1:** If monthly (ScottishPower's preference), the results would be included in the overall balanced scorecard as a "positive" score alongside the "negative" scores of the other four metrics (see worked example in Section 2).

**Option 2:** If anything other than monthly, the results would have to be shown as a standalone measure (the worked example in Section 2 would have to be altered to exclude the research score).

To commission such a piece of work, we believe that further stakeholder discussion is necessary to agree on some important points. These key issues include:

- Who would conduct the research?
- The research questions
- Converting the results into a logical scoring regime
- The frequency of the surveys
- The process for providing the relevant sample data
- Funding

ScottishPower would ask Consumer Focus to consider monthly customer research due to the fact that network operators are currently monitored on a monthly basis regarding network faults (Ofgem's Regulatory Information and Incentives Scheme for Networks).

## **Section 4 – Positive indicators**

The positive indicator ScottishPower considers most appropriate in relation to complaint handling is customer research. Speaking to customers who have reason to complain to their suppliers is the best and most reliable way to capture qualitative feedback about the service they receive.

Whilst numbers can never be assured to be accurate, responses to correctly worded questions provide a truthful insight from the people who matter most in complaint process – the customer.

As regards other positive indicators, ScottishPower recognises and acknowledges that competition has to be allowed, and that companies will not necessarily want to share best practices, particularly in an arena where they are being ranked.

The positive outputs will be reflected in companies desire to improve their league position, and will be evident for customers, who will witness service level improvements. However this is an area that we would be happy to discuss further as the balanced scorecard evolves.

## **Section 5 – Coverage**

### Domestic suppliers

ScottishPower believes that the small suppliers should get the same coverage as larger domestic energy suppliers and that they should be held accountable to the same rigors, in the belief that their customers deserve the same levels of service.

ScottishPower therefore propose that they should be governed by the same metrics as the large domestic energy suppliers, but they should be in their own league table so as to give these suppliers an equal comparison.

### Non-domestic suppliers

ScottishPower believe business customers should have access to exactly the same information as domestic customers. In that respect, all suppliers who hold a non-domestic Licence should be governed by the same complaint metrics described in this response, in relation to their micro business customers.

As the totals for the larger domestic suppliers will include domestic customer numbers, these will not be comparable with those for non-domestic suppliers. Therefore, all results for non-domestic suppliers should also be displayed in a separate chart.

## **Section 6 – Presentation**

ScottishPower fully agree that for the customer, the less complicated the scoring, the easier it can be understood.

We propose 4 simple bar charts, showing the “best” to “worst”, and one each for:

- Domestic complaints – Large Domestic suppliers
- Domestic complaints – Small Domestic suppliers
- Micro-Business complaints – Large Domestic suppliers
- Micro-Business complaints – other Non-domestic suppliers

## **Section 7 – Publication**

ScottishPower proposes that the performance charts be published monthly, and on the Consumer Focus website only, as the most reliable source of information for consumers.

## **Section 8 – Benchmarking with other sectors**

**The energy industry is complex by nature, with difficult processes and issues that are only prevalent in this market place. As a result, it can be an extremely difficult industry to benchmark against.**

**Any benchmarking conducted has to be a level playing field, which will present the most difficult challenge when looking for another industry to monitor against.**

**Perhaps worthwhile, would be to look at service aspects alone and consider if there are other industries with the volumetrics that the energy industry has, e.g. call volumes, number of bills issued, no of meters/recording devices.**

**If such an industry cannot be found, it may be worthwhile considering benchmarking the energy industries within mainland Europe, USA, the Far East, and Australia. However, in such cases consideration should also be given to the maturity of any markets and the reality that a more developed competitive market is likely to experience higher levels of complaints as consumers become more engaged and empowered with the market.**

## **Section 9 – Other issues**

ScottishPower was one of the early supporters of a balanced scorecard and completely agree it is the right way in which to measure complaints. However, in addition to the “basket of measures” having the right mix, the need to report accurately on all measures is fundamentally crucial.

In fact, ScottishPower propose that the interim reporting measures currently in place be removed immediately. As detailed above in Sections 1.3 and 1.5, the issues that have to be addressed for these metrics to be “fit for purpose” in a balanced scorecard, have to be addressed to make them “fit for purpose” as interim measures. Until they are, energy customers will not be able to rely on accurate complaints reporting. We do not believe that the current interim reporting measures would pass a formal quality audit. We believe then that it is better to have no interim measures than to have those upon which customers cannot accurately rely.

In relation to the wider balanced scorecard, we would also welcome consideration of how this will be monitored or audited going forward, to ensure that it is, and remains fit for purpose.

Other topics for consideration would be:

- Consistency in signposting
- Share lessons learnt, with the issue of a “best-in-class” report
- Facilitate the improvement in the industry processes that all suppliers suffer from and contribute to why many customer complaints take as long as they do to resolve.

- Consider conducting a 6-month review of performance metrics, find out what customers views are of them, and consider alterations to either the metrics themselves, or the weightings.