Energy supplier rating

Decision on new customer service metrics and other updates

January 2020





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Summary

Citizens Advice provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. From 1 April 2014, Citizens Advice took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain. The Citizens Advice energy supplier rating serves as part of this statutory function.

First published in 2016, the star rating provides consumers with accessible information about energy supplier performance and enables consumers to make more informed switching decisions. It is published on our website and integrated into the results page of our price comparison website (PCW).¹

It is important that our rating measures the experiences which are important to energy consumers. With this in mind we followed the process outlined below to improve the star rating metrics:

- In our decision document published in October 2018, we confirmed our intention to issue an exploratory RFI with a view to updating the customer service metric in the star rating.²
- In January 2019, the exploratory RFI was issued to suppliers currently in the rating, asking for information on prevalence and response time for key customer service channels.
- In June 2019 we invited all domestic suppliers to attend a workshop or webinar to present our findings and to discuss possible changes to the rating.
- In September 2019 we shared a consultation document containing our minded-to proposals with all domestic suppliers and other stakeholders, with responses received in October 2019.
- In November and December 2019, we analysed the feedback from the consultation responses, which included follow up calls with suppliers to discuss technical issues raised. We also commissioned a Populus poll on customer service expectations.³

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

²https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/FINAL_DecisionDocOct2018_consultation%20smaller%20suppliers%20rating.pdf

³ The Populus poll for Citizens Advice surveyed 2,000 people online and 1,000 by telephone (CATI) between 13 and 17 November. Representative sampling across England, Scotland and Wales.

The key decisions we have made on updates to the customer service metric are:

- To update the customer service metric in the rating to include email and social media response times.
- Not to include telephone ringbacks and dropped calls as new metrics in the rating.
- Not to include web chat as a metric at this stage, but we are continuing our investigations on how to include it in the near future.
- To adjust our proposed methodology for incorporating the new metrics into the rating (see table 1).

In addition to our decisions on updating the customer service metric, we have used this update to confirm the following changes:

- To include the EUK Vulnerability Charter in the customer commitments metric.
- To change the reporting period for Energy Ombudsman data in the rating from acceptance date to completion date.
- To align our switching metric with Ofgem's proposed approach for the Guaranteed Standards on switching.
- In the event of a supplier failure, to remove the supplier from the star rating and adjust other supplier rankings accordingly.
- To provide clarification around the exclusions for the call waiting time metric.

Table 1: new rating design after changes

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
Customer service	15%	Average call waiting time	RFI
	10%	Email	
		Social media	
Switching	10%	Switches completed in 21 days	RFI
Customer commitments	10%	Vulnerability Charter, Membership of the Energy Switch Guarantee	Publicly available

Evidence base for new metrics

To guide our decisions on whether to include new metrics and the appropriate levels to set scoring thresholds, we relied on the following evidence:

- An exploratory Request for Information (RFI) which was sent to all suppliers that were currently in the rating or due to join in the next release. See annex for key results.
- Feedback from a webinar and webchat which were held in June 2019, which all domestic suppliers were invited to attend.
- Responses to a consultation on the new metrics, which was sent to all domestic energy suppliers and also to relevant stakeholders in September 2019.
- A Populus poll, on behalf of Citizens Advice, which surveyed 2,000 people online and 1,000 by telephone (CATI) between 13 and 17 November 2019.⁴ Respondents were asked questions about their preferred contact methods and customer service expectations. See annex for key results.
- Forthcoming research with the Institute of Customer Service (ICS), looking at customer service experiences and expectations in the energy sector.
 See annex for key relevant results.
- Additional external research including research highlighted by respondents to our consultation.

Consultation and Exploratory Request for Information (RFI)

The exploratory RFI was sent to all suppliers who were currently in the rating or were due to join in the next release of the rating. 32 suppliers out of 42 responded to the exploratory RFI. You can view a copy of the original exploratory RFI and proforma here and here.

The exploratory RFI requested performance data from Q2 2018 and Q3 2018, and asked for information on the following metrics: telephone ringbacks and dropped calls, social media, emails, and webchat. Where suppliers were unable to provide data we requested an explanation of why this data was unavailable.

We invited all domestic suppliers to attend either a workshop or webinar in June 2019 to discuss the findings of the exploratory RFI, and discuss future changes to

⁴ Representative sampling across England, Scotland and Wales.

the methodology. In total 52 representatives from 31 suppliers signed up to the workshop and webinar. We also received feedback from suppliers via email. Further details of the feedback from the webinar and workshop can be found in the appendix at the end of this document.

Following the workshop and webinar we released a consultation document in September 2019, with a deadline for stakeholder responses in October 2019.⁵ The consultation document was sent to all domestic energy suppliers, alongside several other key stakeholders. A version of question 18 was also sent to all non-domestic energy suppliers in our non-domestic energy supplier performance league table. The consultation document was also published on our website.

We received substantive written responses from 20 domestic energy suppliers and 2 stakeholders. We also received written responses from 5 non-domestic energy suppliers. In some cases we held calls with suppliers to get a better understanding of the specific issues raised in their consultation responses.

Thank you to all the stakeholders who took part in the consultation process.

Principles for designing new metrics

As in our previous consultations on proposed new metrics for the rating, the decisions are based on certain high level principles. We began by considering the range of metrics that are important to the consumer experience in each category. These must accurately reflect the performance of each supplier in the relevant areas. It should remain simple enough to be readily understood by consumers, and clear to suppliers how their scores have been calculated.

As in previous consultations, proposed metrics have also been assessed according to whether they pass 2 tests:

- **Are the metrics appropriate measures of performance?** This was based on evidence from an exploratory information request, alongside other research and views collected from suppliers through consultation.
- **Is the data robust and comparable across suppliers?** This was tested through an exploratory information request.

<u>https://www.citizensadvice.org.uk/about-us/policy-research-topics/energy-policy-research-and-consultation-responses/energy-policy-research/energy-supplier-rating-consultation-on-new-customer-service-metrics-and-other-updates/</u>

We also assessed what types of data would be available to measure performance for each metric. There are 2 main approaches to this:

- 1. **Assessment of performance of supplier services.** This is how we currently assess performance in relation to switching, billing, and our current customer service metric.
- 2. **Assessment of existence of supplier services**. This is how we currently assess performance in the 'customer commitments' category.

We favour the first approach where possible, as this is based on actual supplier performance. This also improves transparency by making more performance information available, in line with our aims for the rating.

Quantitative performance data collected for the rating needs to be robust and comparable across all suppliers. It must also be possible to collect in a timely manner for the rating. We have sought to limit the burden of information requests on industry by requesting data that is already collected by suppliers, where possible.

We will not propose scoring thresholds for the new metrics at this stage. Scoring will take account of both the range of performance and the average across suppliers, based on supplier submissions for the Q2 2020 release of the rating. We have also considered benchmarks for best practice based on our own research, and research highlighted by respondents. We will share the scoring criteria for new metrics with suppliers around August 2020, in advance of the Q2 2020 release.

Email metric

Minded-to proposal

In our customer service consultation we proposed the following:

- To take forward email as a metric in measuring customer service performance and use response time as our measure of supplier performance.
- To use response time to all emails in an email thread, but to discount subsequent/secondary messages that are sent by a customer in between supplier responses.
- To make email a mandatory customer service metric, and to score suppliers zero if they do not offer it.

We also asked respondents to share any relevant research or insight on customer expectations of email response time to help guide our decision making on scoring thresholds.

Stakeholder views in the consultation

The majority of respondents agreed broadly with our overall proposal to include email as a customer service metric. Some respondents who agreed with the proposal felt that it was important to provide greater clarity over what would be included in the metric. 2 respondents disagreed with this proposal. Concerns expressed by these respondents were:

- That consumers are using email as a contact channel less and less frequently, and are increasingly moving to more immediately responsive channels, such as digital conversations and social media.
- That staff were less well equipped to deal with queries via email than via telephone.
- That not enough suppliers were able to provide comparable data for the exploratory RFI on this metric.
- That the reporting requirements would increase cost, particularly for smaller suppliers.

All respondents who agreed with the overall proposal to include email as a metric also broadly agreed with the proposal to use percentage response time (within a certain number of days) as our measure of supplier performance. While respondents generally agreed with the proposal they did have a number of additional comments:

- Respondents pointed out that some customers may request a phone call in response to their email, and said that suppliers should not be penalised for not replying to an email in these cases.
- Respondents felt that the proposed RFI should be further clarified so that suppliers cannot simply auto-respond to queries.
- Respondents raised concerns that this was a blunt measure of performance, and that other measures (e.g. quality of response, resolution time) may be better.
- Respondents requested further information about how time outside of working hours would be captured in our metric.
- One respondent felt that average response time should be considered as an alternative to number of emails within a time period, as this would show that suppliers were consistent in their response time.
- One respondent felt that email response time was easily gameable.

A significant proportion of respondents said that while they supported the proposal, they would have technical difficulties with measuring all emails in an email thread while discounting subsequent/secondary messages that are sent by a customer in between supplier responses.

Decision

We have decided to proceed with our proposal to include email as a customer service metric. We recognise that consumer preferences for how they contact their supplier are changing, and that it is important that the rating reflects this.

Some respondents felt that email was not as popular as some other forms of contact, such as webchat and social media. Although there is variance across suppliers, our evidence shows that this is generally not the case:

- Responses to our exploratory RFI suggest that email is the second most common contact channel (after telephone).⁶
- The results of a November 2019 Populus poll found that it was the second most common channel (after telephone) for people to contact their energy supplier.⁷
- Forthcoming research with the ICS found that consumers value email as a communication channel, with many consumers choosing it as their preferred method to be contacted by their supplier.⁸

It is also a requirement that consumers be able to make complaints to their supplier via email.⁹

The results of the exploratory RFI also found that the second highest number of suppliers were able to provide comparable data on response time for email, after telephone. One respondent felt that 19 out of 32 suppliers providing comparable data was too low to be considered adequate. However, this data was collected for retrospective quarters using an exploratory RFI. Many suppliers who were unable to provide data commented that they would be able to in the future. Additionally, some suppliers did provide data but in a form that was not comparable with other suppliers, as a result of differing interpretations of the

⁶ For suppliers who could provide data, the exploratory RFI found that as a percentage of overall contacts the median number of email contacts was 22% (range = 75.1%)

⁷ When asked "how do you normally contact your energy supplier if indeed you do?", 32% of respondents answered email, whereas 53% answered telephone.

⁸ Email was listed as the preferred method for consumers to be contacted by their supplier for: day to day account management (41%), information about new tariffs (47%) and bill issues (40%).

⁹ The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

RFI. We expect suppliers to be able to provide comparable data for this metric once they've been given a period of time to set up reporting for this metric, and further clarification on the details of our request.

While we acknowledge that there could be resource implications involved in reporting on this metric, we have been careful to select a metric which many suppliers will already be collecting data for in some form. Additionally, as email is a required channel for consumers to make a complaint, we would expect suppliers to be monitoring response times for this channel.¹⁰

We have decided to continue with email as a mandatory customer service metric, and therefore score suppliers zero for the email component if they do not offer it. While some suppliers were concerned that this would be too prescriptive, we feel that email is an essential contact channel for the reasons listed above.

We have decided to proceed with our proposal to use response time within 2 working days as our measure of supplier performance. We carefully considered other measures of performance, including: resolution time, additional qualitative measures, and customer satisfaction metrics. For resolution time we concluded that this measure would be vulnerable to differences in terms of interpretation, which would make comparability across suppliers impossible. When it comes to additional qualitative measures, we felt that this would result in unjustifiable reporting burdens on suppliers.

The decision to use response time within 2 working days (rather than 1 or 5) was based on the evidence from the Populus poll and our exploratory RFI. Our Populus poll suggests that a clear majority of consumers expect a response to an email within 2 days.¹¹ The results of the exploratory RFI also suggests that good performance against this metric is possible.¹²

While we understand and recognise the role of customer satisfaction metrics, our experience has demonstrated that relying on omnibus survey results is not feasible for the current range of suppliers in the rating. This is because it would mean relying on unacceptably small sample sizes for certain suppliers. This is why Citizens Advice decided to move away from using customer satisfaction

¹⁰ The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

¹¹ When asked: 'What is the maximum acceptable response time for queries via email?", 81% of respondents answered either within 48 hours or less.

¹² The maximum percentage of emails answered within 2 working days in the exploratory RFI was 100%, the median figure was 49%.

metrics in October 2016, as it was important that our rating included as much of the market as possible.

Most respondents were supportive in principle of our proposal to measure the response time to all emails from a consumer in an email thread, but to discount subsequent/secondary messages that are sent by a customer in between supplier responses. However, several respondents queried whether this would be technically achievable.

Many respondents said that they would be able to measure the response time to all emails in an email thread, but that their email reporting systems would not be able to discount subsequent/secondary messages that are sent by a customer in between supplier responses. In addition to supplier responses in the consultation document, we also contacted suppliers who had raised concerns in this area for follow up conversations to get a better understanding of the problem.

The way these subsequent/secondary emails are treated by supplier systems varies. For some suppliers, the system automatically records the time taken to respond to the first email. For another, their system records their response as answering two emails, and would provide an average response time based on both responses. Another respondent stated that where a consumer has sent a subsequent/secondary email in between supplier responses, their system automatically registers the initial email as going unanswered. Finally, one respondent said that they were unable to record the response time to any emails following their first response to a customers query. This was because all emails were dealt with by individual customer service agents following the first point of contact.

While we would like to measure all emails in an email thread, the differences in reporting capabilities across suppliers raises serious concerns about whether the data would be robust and comparable across suppliers. Therefore **we have decided only to measure the response time to the initial email in a chain of communication from a consumer.**

In our definition of 'answered substantively' for email response time, suppliers requested further information about the parameters of the definition. One respondent stated that our definition should clarify that this excludes auto-responses, to prevent suppliers using this to game the metric. However, another respondent pointed out that in certain instances an auto-response may be appropriate and could adequately respond to a consumer's query. Therefore,

we have decided to request information from suppliers about email queries that were responded to via auto-respond, and to remove these from the calculation of a supplier's score.

Another respondent pointed out that in some instances a consumer may request a phone call from a supplier, and that these emails should not be classified as unanswered. However, overall the feedback that we have received does not indicate that this is a particularly widespread issue. In most cases we would expect suppliers to respond to a consumer via email if the consumer had initiated contact via this channel. Therefore, we have decided that any instance where a consumer raises a query via email and does not receive a response should be recorded as unanswered.

Respondents also requested further clarification over how time outside of working hours would be treated in our metric. In terms of working days and hours, we will use the definition outlined in the Consumer Complaints Handling Standards.¹³ The day on which a consumer contacts their supplier will be classified as day 0, with the following day classified as day 1. The intention here is to ensure comparability across suppliers and alignment with existing rules.

¹³The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008, Section 4 (4)

Social media metric

Minded-to proposal

In our consultation we proposed:

- Taking social media forward as a measure of customer service performance.
- Using Twitter and Facebook as the contact channels we measure, and to only measure contacts via direct (private) messages.
- Measuring the response time to all measures from a consumer, but to discount the response time to subsequent/secondary messages from the consumer which were sent between supplier responses.
- That social media should not be a mandatory contact channel, but that suppliers who have a presence on these channels should be contactable through them.
- A definition of 'answered substantively' to determine which supplier responses should be measured.

We also asked respondents to share any relevant research which could help us to decide on the appropriate levels to set our thresholds for this metric.

Stakeholder views in the consultation

The majority of respondents broadly agreed with our proposal to include social media as a customer service metric. 2 respondents disagreed with the proposal. Respondents who disagreed felt:

- That staff were less well equipped to deal with queries via social media than via telephone.
- That the quality of the data received in the exploratory RFI did not provide enough confidence in the ability to compare this metric across suppliers.
- That reporting on this metric would be expensive.
- That their own evidence suggests that customers do not see social media as an important method of communication.

While the majority of respondents broadly agreed with the proposal, they did raise the following additional comments:

- That tracking this metric could be onerous for suppliers.
- That it is important to clearly define what should fall into this metric, and that any terms used are clearly defined.

All respondents who agreed with the overall proposal agreed that we should measure Facebook and Twitter contacts. The majority of respondents agreed that we should only measure direct messages. One supplier argued that we should also measure public messages. They felt that consumers still deserved a response to public messages, and suppliers could game the metric if we only measured private messages. One respondent also suggested that we should measure Trustpilot contacts in addition to Facebook and Twitter.

The majority of respondents broadly agreed with our proposal not to make social media a mandatory contact channel, but to penalise suppliers who have a presence on social media but do not respond to customer queries via this channel. One respondent felt that social media should be a mandatory channel, as it is an increasingly common way for consumers to contact their supplier. Additional respondent comments were:

- That suppliers should not be penalised for failing to respond to consumer queries if their use of social media is solely as an outbound news mechanism.
- That suppliers could change their channel to "marketing only" to avoid reporting on this metric.
- One respondent also suggested that we introduce a metric for contact channels which resembles the existing customer guarantee metric, whereby suppliers achieve set scores according to the number of contact channels offered.

In relation to our proposals to change the wording around 'answered substantively' in the information request, the majority of respondents agreed. Additional comments were:

- That our definition of 'answered substantively' was not definitive and was therefore open to conjecture.
- That we need to clarify the role of chatbots and whether these are reported in the metrics.

Decision

We have decided to proceed with our proposal to include social media as a customer service metric. While some respondents pointed to evidence that social media was not seen as important by their customer base, others suggested that it is an increasingly important contact channel for consumers. The majority of respondents agreed with our proposal to include this metric.

One respondent felt that the quality of the data received in the exploratory RFI did not provide enough confidence that there would be comparable data across suppliers to measure this metric. However, this data was collected for retrospective quarters using an exploratory RFI. As such, many suppliers who were unable to provide data commented that they would be able to in the future. Additionally, some suppliers did provide data but in a form that was not comparable with other suppliers, as a result of differing interpretations of the RFI. Given a period of time to set up reporting for this metric, and more specific details on what we are requesting, we expect suppliers to be able to provide comparable data for this metric.

We acknowledge the concern expressed by suppliers about the resource required to report on this metric. Where possible we have been careful to minimise reporting requirements on suppliers by requesting metrics that are already being recorded. As discussed below, we only propose to include social media where it accounts for a substantial share of a suppliers contacts.

When surveyed, relatively few energy consumers listed social media as their preferred method of contacting their supplier.¹⁴ Responses to our exploratory RFI also suggest that it is less important than email and telephone.¹⁵ One respondent also surveyed their own customers, and found that very few saw social media as an important channel. However, there were some instances in the exploratory RFI where suppliers reported similar numbers of social media contacts to email. Several respondents to the consultation also emphasised the importance of social media as a contact method.

Based on the above evidence, we have decided to include social media as a customer service metric, but only in instances where it makes up 5% or more of the overall contacts for a supplier. This is based on the results of our exploratory RFI, and is set at a level to ensure we receive robust numbers for comparison. The 5% threshold also ensures that suppliers are only required to report on social media where it accounts for a significant level of their contacts.

We have decided to proceed with our proposal to include Facebook and Twitter contacts in the metric, and to only include direct (private) message.

The overwhelming majority of respondents agreed with the inclusion of these channels. We will consider including other channels in the future, depending on

¹⁴ When asked: "how do you normally contact your energy supplier if indeed you do" 2% of respondents answered social media, compared to 32% for email.

¹⁵ In the exploratory RFI, available data found that the median number of contacts for email were 22%, whereas social media was <1%.

the robustness of reporting and the nature of the service. Although one respondent argued for the inclusion of public messages in the metric, other responses pointed to difficulties in ascertaining whether public messages required a response. Several respondents also pointed out that customer queries raised publicly were often moved onto direct messages.

We have decided to continue with the wording 'substantively answered' to determine which responses need to be measured. However, in response to feedback from respondents we have decided to further clarify the parameters of this definition. This includes clarifying the use of chatbots and auto-responses to answer social media queries. Therefore, we have decided to exclude auto-responded queries from the calculation, and to only measure social media messages which are connected to an advisor. This way suppliers are not penalised for using auto-responses to effectively answer a query, but suppliers are not incentivised to use this in all instances. This aligns with our approach of excluding time waiting in an Interactive Voice Recording (IVR) within the telephone wait time metric.

Most respondents were in favour, in principle, of our proposal to measure the response time to all messages in a message thread, but to discount subsequent/secondary messages that are sent by a customer in between supplier responses. However, several respondents queried whether this would be technically achievable.

As with email, many respondents said that they would have technical difficulties when measuring response time to follow up messages in a social media query, and in particular subsequent/secondary messages that are sent by a customer in between supplier responses. We contacted suppliers who had raised concerns in this area for follow up conversations to get a better understanding of the problem.

The way that subsequent/secondary messages are recorded by supplier systems varies. Therefore, the differences in reporting capabilities across suppliers raises concerns about whether the data we collected would be robust and comparable. As such, we have decided only to measure the response time to initial messages from a consumer.

We have decided to continue with our minded-to proposal to use **average response time as our measure of performance for social media.** We received comparable data on this metric in the exploratory RFI. This also reflects

consumer expectations of shorter response times for social media than email, which was found in the November Populus poll. The results of our exploratory RFI also shows that most suppliers have an average social media response time of significantly under 1 day. The results of significantly under 1 day.

Decisions on scoring benchmarks will be made following receipt of the first quarterly RFI, and will also be based on the RFI alongside the results of the Populus polling and our forthcoming ICS research.

Webchat metric

Minded-to proposal

Given webchat's growing importance as a communication channel, we were keen to include it as a customer service metric. However, through the consultation we determined a number of data reporting issues, outlined below. Therefore, we will continue our work with suppliers so it can be included at a later date, once we are confident the issues around accurately measuring performance have been resolved.

Stakeholder views in the consultation

The majority of respondents agreed with our proposal not to include webchat as a customer service metric at this stage, but to keep it under review. However, a significant number of respondents disagreed with our proposal. Those who disagreed commented:

- That webchat is a convenient, accessible, secure, dedicated and increasingly important communication channel for consumers.
- That consumers viewed webchat as a more important communication channel than social media and email.
- That webchat should be introduced as a metric, and if suppliers could not report on it they should be penalised in the rating.
- That we should work with suppliers to agree on a version of the metric which could be used.
- One respondent felt that webchat should not be included in the metric at all as it could be easily gamed.

¹⁶ When asked: "what is the maximum acceptable response time for queries via a direct message through a social media channel", 57% of respondents answered 30 minutes - 1 hour or less.

¹⁷ In the exploratory RFI the median average response time for suppliers via social media in Q2 was 2 hours and 57 minutes, and in Q3 it was 3 hours 30 minutes.

Many respondents agreed with our proposal, but also commented:

- That webchat was an important communication tool and that they would like to see it included at the earliest opportunity.
- One respondent suggested that webchat should be requested regularly in our ongoing RFI to allow monitoring of changing progress and to demonstrate how this metric could be measured in the future.
- One respondent requested a proposed timescale for including this metric in the future.
- One respondent expressed their willingness to work with us to develop a webchat metric going forward.
- One respondent emphasised that when webchat is introduced as a metric suppliers should not be penalised if they do not offer it.

Decision

We have decided to proceed with our decision not to include webchat at this stage, but to seek a resolution to the data comparability issues so it can be included as a metric in the near future.

As discussed above, throughout the process we have used two tests which proposed metrics need to pass in order to be considered for inclusion in the Star Rating:

- Are the metrics appropriate measures of performance?
- Is the data robust and comparable across suppliers?

We are confident that the webchat metric would be an appropriate measure of performance. In our exploratory RFI, for suppliers who do offer webchat and were able to provide contact data, it made up an average of 5% of contacts, although for some suppliers it was higher. 18 15% of respondents to the Populus survey listed webchat as the most common method of contacting their supplier. 19 Our forthcoming research also finds that webchat is a preferred method to contact suppliers for an increasing number of consumers, particularly for supply or billing issues. 20

¹⁸ For suppliers who reported on webchat, the median number of contacts as a percentage of overall contacts was 5.2% (range = 24.6%).

¹⁹ When asked: "how do you normally contact your energy supplier if indeed you do", 15% of respondents answered webchat.

²⁰ Citizens Advice/Institute of Customer Service - forthcoming research, 2020

The importance of webchat was also reflected in responses to the consultation. Many respondents highlighted that webchat is a convenient, accessible, secure, dedicated and increasingly important communication channel for consumers. Several respondents also emphasised that many consumers viewed webchat as a more important contact channel than email and social media.

While there is evidence that webchat is a growing channel, our evidence shows that email and telephone are more important. Suppliers who provided data for our exploratory RFI generally reported greater numbers of contacts to telephone and email.²¹ This is supported by the Populus data.²² Forthcoming Citizens Advice research also indicates that consumers prefer to be contacted by email and telephone.²³

Crucially, we are not confident that the data we could collect for this metric would be robust and comparable across suppliers. Of the 32 suppliers who responded to the exploratory RFI, only 11 both offered webchat during the reporting period and were able to provide data on the total number of contacts received.

Only 7 of the 32 suppliers were able to provide data on the average time for a customer to be connected to an advisor on webchat, with even fewer suppliers being able to provide data on the number of customers connected in 1, 2 and 5 minutes.

Where suppliers did offer webchat, answers to the qualitative question revealed numerous differences in the type of webchat systems suppliers used. Some suppliers only offer webchat during less busy periods, whereas other suppliers offered it during busy periods. While many respondents strongly advocated for the inclusion of webchat as a metric, unfortunately no respondents were able to suggest a solution to problems of comparability in the data.

One respondent suggested that we should introduce webchat as a metric, and if suppliers could not report on it they should be penalised in the rating. However, the problem with reporting largely lies in differences in the way that webchat is used across suppliers. If we introduced webchat immediately, penalising

 $^{^{21}}$ The median number of contacts for telephone in the RFI was 70.7% (range = 94.5%), whereas email was 22% (range=75.1%).

²² When asked: "how do you normally contact your energy supplier if indeed you do", 53% of respondents answered telephone and 32% answered email.

²³ Citizens Advice/Institute of Customer Service - forthcoming research, 2020

suppliers for not being able to report would therefore require taking a prescriptive position on which model is appropriate.

Although we are not looking to include webchat at this stage, we are actively exploring ways of introducing it in the near future. This is likely to include a new exploratory RFI, and working with our data team, to assess ways to feasibly compare webchat performance across different supplier models. The inclusion of webchat is likely to be based on a similar principle to social media, requiring overall supplier contacts to meet a minimum threshold.

Additional telephone metrics

Minded-to proposal

We proposed not to include telephone abandonment rates and scheduled ringbacks as additional customer service metrics.

Stakeholder views in the consultation

All but one respondents agreed with our proposal not to include these metrics in our customer service metrics. One respondent did not agree with the proposal to not include telephone abandonment rates. They felt that telephone abandonment rates are an important measure of performance. They also pointed out that the quality of the data received in the exploratory RFI were higher for telephone abandonment rates than for email and social media.

Decision

We have decided not to include telephone abandonment rates and scheduled ringbacks as additional customer service metrics. Evidence from the exploratory RFI suggested that while the data collected on telephone abandonments were good, this was also highly correlated with telephone wait times. Additionally, respondents also pointed out that telephone abandonment rates could be a sign of effective signposting in the IVR. For the scheduled ringbacks metric the data we received in the exploratory RFI was poor. We also found evidence that the way ringbacks are used varies significantly across suppliers.

While most respondents agreed with the proposal not to include these metrics, one respondent disagreed. They felt that telephone abandonment rate was an important performance measure, and that the data received for abandonment

rates was better than for email and social media. However, this does not allay our concerns that abandonment rates are correlated with call wait times, and may reflect good signposting in the IVR for some suppliers. Therefore, we are not confident that telephone abandonment rates are an appropriate measure of performance.

Incorporating the new metrics into the overall rating

Minded-to proposals

In our consultation we proposed:

- To continue to keep the phone line as a mandatory metric in the rating.
- To give call centre wait time the highest weighting in the updated customer service metric, making up 15% of the overall score.
- That suppliers who are contactable via both email and social media receive a 5% score for each metric.
- That suppliers who do not have a presence on social media receive a 10% score for the email metric.
- That the overall customer service metric would increase to 25%.
- That we would remove the bill timeliness element of the rating, and increase the billing accuracy element by 5%.
- To retain the requirement for a supplier to receive a score for the accuracy metric, and for suppliers who do not meet the threshold for inclusion in this metric to be scored on the other metrics only.²⁴

Stakeholder views in the consultation

Less than half of respondents agreed with the majority of our proposal. A majority of respondents either did not agree with the proposal or did not agree with substantial elements of the proposal.

A large number of respondents objected to the decision to remove bill timeliness from the rating, commenting that:

- Given the importance of billing generally (timeliness and accuracy), it was not clear why this metric had been weighted downwards.
- Bill timeliness was still very important for customers who either pay on receipt of bill or just like to keep an eye on their usage.

²⁴ See table 1 for a breakdown of the rating with the new changes

• They disagreed with the conclusion that moving to a principles-based approach would make bill timeliness less relevant.

In addition, one respondent agreed with the decision to remove bill timeliness from the metric but argued that the billing score should remain at 20% of the rating. Other respondents instead proposed:

- Reducing the weighting of the customer commitments metric.
- Increasing the customer service metric to 30% of the overall rating, and reducing the weighting of the complaints metric by 5%.

Respondents also raised concerns about the other proposals for incorporating the metrics into the overall rating, including:

- Concern that the proposed weightings of the customer service metrics do not accurately reflect the shares of contact to those channels. One respondent suggested instead that the share should be directly related to the volume of contacts received.
- Disagreement that social media should achieve parity in the rating with email where a supplier offers it, as it is a less popular form of contact for consumers.
- Other respondents felt that email should achieve a higher weighting in the rating to reflect its importance to consumers.
- One respondent questioned the decision to have any mandatory customer service metrics.

Decision

We have decided to proceed with our proposal to keep the phone line as a mandatory metric in the star rating, and to continue to score suppliers zero for this component in the metric if they do not offer one.

We acknowledge one respondent's conviction that no contact method should be compulsory, and are conscious that consumers increasingly prefer to contact their suppliers in different ways. However, as outlined in our minded-to position, we continue to believe that phone lines remain crucial, especially for consumers in vulnerable circumstances or in emergencies.²⁵ This position was echoed in the final report from the Commission for Customers in Vulnerable Circumstances.²⁶ Telephone remains the most commonly used channel in general, with 31 suppliers receiving 41,916,896 telephone contacts in Q2 and Q3 2018.²⁷

²⁵https://wearecitizensadvice.org.uk/why-energy-suppliers-need-to-keep-their-customer-phone-services-513b568848b1

²⁶ https://www.energy-uk.org.uk/publication.html?task=file.download&id=7140

²⁷ One supplier did not provide total contact data for telephone

Telephone is also a required channel for consumers to make a complaint, an obligation that most suppliers meet by having an inbound telephone service.²⁸

Therefore, we will continue to keep the phone line as a mandatory metric in the star rating, and will continue to score suppliers zero for this component of the metric if they do not offer one. We have also decided to award call centre wait time the highest weighting in the updated customer service metric, making up 15% of the overall score.

We have decided to proceed with our proposal that suppliers who are contactable via email and social media receive a 5% score for each metric. Suppliers who do not have a presence on social media will receive a 10% score for email. This means that the overall customer service metric will increase to 25% of the overall rating (with call centre wait time making up the remaining 15%). We have decided to remove the bill timeliness element of the rating altogether, and to increase the bill accuracy score to 20%.

Table 1 shows the rating design based on our decision.

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
Customer service	15%	Average call waiting time	RFI
	10%	Email	
		Social media	
Switching	10%	Switches completed in 21 days	RFI
Customer commitments	10%	Vulnerability Charter, Membership of the Energy Switch Guarantee	Publicly available

We will retain the requirement for a supplier to have had 5,000 customer accounts paying by a method other than prepayment for more than a year in order to receive a score in the accuracy metric. Suppliers which do not meet this requirement are scored on the other metrics only, with their rating adjusted to give a result out of five.

²⁸ The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

Several respondents to the consultation questioned either the decision to remove bill timeliness or to decrease the weighting of billing more generally. Respondents pointed to the importance of billing in general, and pointed to the importance of bill timeliness for customers who pay on receipt of bill. Another respondent felt that it was not clear why Ofgem's decision to move to a more principles-based approach would make bill timeliness less relevant.

While we have decided to remove the bill timeliness element of the rating, our decision to increase the bill accuracy element reflects the importance of billing on customer experience. As we have discussed previously, there is evidence to suggest that accurate billing is more important to consumers than bill timeliness.²⁹ The results of our recent survey of energy consumers also found that a majority of respondents see billing accuracy as the most important aspect of an energy supplier's service.³⁰ In contrast, very few respondents felt that bill timeliness was the most important aspect of performance.³¹

In the past we also measured annual statements in our timeliness measure which allowed us to capture PPM customer experience, however Ofgem's decision to remove the annual statement requirement means that this is no longer possible.³²

Ofgem's move to a principles-based approach also encourages suppliers to communicate billing information in more innovative and personalised ways. We expect this to make traditional bills less important to consumers, as suppliers communicate this information in other ways. Finally, as smart meter customers are not required to receive regular bills, this measure will continue to lose importance in the future.

Respondents to our survey also listed switching time as the least important aspect of an energy supplier's service³³. **Therefore we have decided to decrease the switching element by 5% to 10%.** We will continue to

²⁹ https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20supplier%20rating% 20-%20consultation%20on%20proposed%20changes v2.pdf

³⁰ 60% of respondents listed billing accuracy as the most important aspect of an energy supplier's service.

³¹ 3% of respondents listed bill timeliness as the most important aspect of an energy supplier's service.

³² https://www.ofgem.gov.uk/system/files/docs/2018/12/final decision - customer communications rule changes.pdf

³³ 3% of respondents listed switching timeliness as the most important aspect of an energy supplier's service (joint last), and only 22% of respondents listed switching as either the first, second, or third most important (joint last).

periodically review the switching metric, which will be particularly important when next-day switching reforms come into effect.

Some respondents expressed concern that the weighting of metrics does not reflect the share of contacts to those channels. Our decision to weight phone calls higher is reflected in our understanding of the importance of this contact channel (as discussed above). While some respondents felt that social media should achieve a lower weighting than email, we felt parity was appropriate considering many suppliers have emphasised the importance of this channel. This is particularly the case where a consumer expects a swift response. We also felt that it would not be appropriate to weight social media any lower considering the resource required for suppliers to report on this metric.

Energy industry changes

We set out in 2019 to review the star rating to ensure that energy consumers' experience of the energy market was reflected accurately in the rating. Since beginning this work, industry changes have been announced which have implications for the star rating. In our consultation we requested comments on our proposals to incorporate the three industry developments outlined below.

Incorporating the new Energy UK Vulnerability Charter into the rating

Minded-to proposals

We proposed:

- To recognise the new Energy UK Vulnerability Charter in the rating.
- To base the weighting decision on two factors:
 - the content of the Code of Practice (now referred to as a Charter) and the extent to which this goes beyond the licence; and,
 - its governance structure and the extent to which this enables both wide participation by suppliers and effective oversight.

With regards to company commitments, we are open to proposals of codes that meet the criteria above, namely going beyond the licence and a governance structure that enables participation and oversight. Currently we believe that the Energy UK Vulnerability Charter and Energy Switch Guarantee meet these requirements.

Stakeholder views in the consultation

A majority of respondents agreed with the proposal to include the Energy UK Vulnerability Charter in the rating. However a significant minority disagreed with the proposal or felt that they were unable to comment. Several respondents said that they were unable to fully comment as the Charter had not yet been finalised, and they would only be able to comment fully when the content and governance was known.

Concerns expressed by respondents included:

- That more voluntary commitments would lead to increased supplier costs, and that the governance structure could put smaller suppliers at a disadvantage.
- That the charter would be too prescriptive and could stifle innovation.

Additional comments were:

- Some respondents requested information on how suppliers who already scored 5 points (the maximum) on the customer commitments element of the rating would benefit from signing up to the charter.
- One respondent suggested that in order to increase transparency we should score suppliers on performance within the charter, rather than just for being signatories.

In relation to the broader role of the Company Commitments, respondents made the following comments:

- Several disagreed with the general principle of basing the Star Rating on third party commitments, which they felt put smaller suppliers at a disadvantage.
- A feeling that the scoring of customer commitments did not reflect the effort and resource intensity they required.
- Other respondents felt that the weighting of the customer commitments metric was too high.
- Some respondents said that we should evaluate the role of the Energy Switch Guarantee in light of the new guaranteed standards of performance on switching.

Decision

We have decided to reflect the new Energy UK Vulnerability Charter in the rating. The scoring will be confirmed when the final draft of the Code of Practice is released in May. The Code of Practice is due to be live from November 2020, so will be reflected in the rating from the Q4 2020 release which will be published in Q1 2021.

In terms of content, the current draft of the Charter includes the protections currently recognised by the star rating in the Prepayment Meter (PPM) Principles and the Safety Net. It also includes a strong steer on new content which goes beyond these from the Commission report. In some areas the current draft demonstrably goes beyond the minimum requirements in the licence. While in other areas this is less clear - for example where Ofgem has not yet made final proposals on self-disconnection, self-rationing and taking account of ability to pay - the approach in the existing draft still maintains a commitment beyond existing licence conditions.

On the governance structure, we feel that the current draft effectively strikes the balance between the level of oversight of signatory compliance and the range of possible signatories. We are satisfied that regular oversight and challenge will be provided via the governance board, of which Citizens Advice will be members. The mechanism of a possible on-site audit and exit from the charter for poor performance should provide signatory compliance, without a prohibitively onerous audit regime.

Changes to the Energy Ombudsman data that is used in the rating

Minded-to proposal

We proposed to change the reporting period for Energy Ombudsman data in the rating from acceptance date to completion date.

Stakeholder views in the consultation

A majority of respondents agreed with our proposal to change the reporting period for Energy Ombudsman data. One respondent disagreed, saying that if a customer had raised a complaint with OS:E it would be fair to assume that they did not believe that they had received a satisfactory level of service irrespective of the dispute status.

Other respondents supported the changes, but requested:

- A shared document from Citizens Advice and Energy Ombudsman that was open to consultation on how this would be implemented and clear definitions of complete.
- Visibility of the impact of this change on suppliers' performances against a 'do nothing' option.
- One respondent suggested that suppliers should have the opportunity to review the methodology once it had been in operation for two quarters, and that they would like to review the proforma before the change is implemented.
- One supplier requested a detailed walk-through document explaining the new process.

Decision

We have decided to proceed with our proposal to change the reporting period for Energy Ombudsman data in the rating from acceptance date to completion date. The advantage of this process change will be that the risk of delay to the rating will decrease, and the burden on resources across suppliers, OS:E and Citizens Advice will ease significantly.

This approach moves from case acceptance data which is solely based on customer perception to signposting at closure where the onus is on suppliers to provide evidence. This produces a more robust dataset and more accurately reflects supplier performance.

One possible issue that we identified with the process is that while we transitioned from using acceptance data in one quarter (Q1) to using completion 18 data in the next quarter (Q2), there would be some duplication - i.e. there will be cases accepted in Q1 that will be completed in Q2 and therefore will count against suppliers in two separate scorecards.

We previously ran analysis comparing the two methods in October-December 2018 (accepted) and January-March 2019 (completed). Through this we found that duplicates were easily identifiable. Therefore, our minded-to proposal was to remove any duplicates from the first 'case completed' quarterly data set. We also proposed to look at cases accepted 2 quarters ago, to ensure that there is no duplication with cases that took longer to investigate.

However, we also identified a risk that the decision to remove duplicates, could lead to artificially improved scores for suppliers during the transition quarter. This could be misleading to consumers (and offer a worse user experience) and could prevent like-for-like comparison of both rating and complaints score with future quarters.

In order to be certain that a move to closed cases data does not have any negative impact on suppliers within the model or the model itself, we carried out a further analysis using data from Q3 and Q4 2019. The analysis compared the impact during the transition quarter, when duplicates are removed compared to a "do nothing" option.

We found that changing from cases accepted to cases closed has very little impact when duplicates are retained. The changes in supplier performance and the difference in the number of stars following the change is consistent with the change from quarter to quarter within cases accepted data, as well as within closed case data. The only material differences appeared when you remove the duplicates from the closed case data set.

Therefore, by removing the duplicates, we would be artificially showing supplier performance to be improved. This could be misleading to consumers and prevent a like-for-like comparison across the rating and complaints score.

Therefore we have decided to retain duplicates during the transition quarter in order to maintain a consistent message of performance to consumers.

The new use of the data will mean that there can be no disputes after the case has been closed by OS:E. Any disputes should be raised with OS:E while the case is open, as there will no longer be disputes process or proforma managed by Citizens Advice within this process. The scorecard will include all Energy Ombudsman cases completed within the reporting period, except where there is evidence of deadlock provided within the investigation period.

Changes to the way we measure switching timelines to align with Ofgem Guaranteed Standards Proposals

Minded-to proposal

In our consultation we proposed to align our switching metric with Ofgem's proposed approach for the switching Guaranteed Standards.

Stakeholder views in the consultation

All respondents who provided comments on this section agreed with our proposal. Additional comments were:

- One respondent suggested that the 10% customer guarantees metric was changed to an offboarding metric in line with the Guaranteed Standards of Performance, so suppliers produce final bills within 6 weeks and offer credit balances within 10 working days.
- One respondent emphasised that their understanding of the 'exceptions' includes, but is not limited to, instances whereby the customer enters into a contract with a supplier but expressly requests a switch date beyond the standards of performance cut-off date.

Decision

We have decided to align our switching metric with Ofgem's proposed approach for Guaranteed Standards. This will incorporate the same definition of exceptions.

Approach to failed suppliers in the rating

Since January 2018, 16 domestic energy suppliers have failed. Several of these suppliers were included in the star rating when they failed. Although the majority of these suppliers were in the lower half of the rating, the supplier that was ranked number 1 in the Q3 2019 publication of the rating subsequently failed. Based on user feedback we have identified the potential for users to be confused if failed suppliers continue to be included on our rating page until the next edition of the rating is published.

Therefore, in the future when a supplier fails they will be removed immediately from the star rating. Other supplier rankings will be adjusted accordingly. All historic rating data about failed suppliers (and other suppliers) will continue to be published on our website. This approach will provide the best user experience, while continuing to provide a complete historic record for stakeholders. We are not currently proposing to make any changes to our rating to reflect non-service related factors, including the risk of supplier failure. Ofgem's supplier licensing review is proposing a number of changes that should reduce the risk of supplier failures in future. This is an area we will keep under active review.

Clarification over call waiting time metric

Several suppliers have requested clarification over our exclusions for reporting on the call centre wait time metric. The quarterly star rating RFI states that suppliers must report: 'The average wait time to answer publicly available inbound, domestic customer initiated, telephone services (excluding dedicated inbound sales lines and sales options in the Interactive Voice Recording (IVR))'.

As a minimum we would generally expect a phone line to be publicly available and accessible on a supplier's website. We would also expect the phone line to be available to deal with a variety of consumer issues and complaints. The phone line must connect to a customer service advisor and cannot be fully automated. As stated in the RFI, reporting should exclude any inbound sales lines and sales options in the IVR.

If you have any questions about these exclusions please feel free to contact thomas.brookebullard@citizensadvice.org.uk.

Expected dates for changes to the star rating

The customer service metrics and associated changes will be introduced in the Q2 2020 (Apr-Jun) release of the rating. The RFI and Proforma for this release of the rating will be sent to suppliers in early July 2020, with a deadline in August 2020.

We intend to send suppliers a draft version of the quarterly RFI and proforma including these changes by 7th February 2020. The changes to Ombudsman data will also be introduced in the Q2 2020 release.

The Vulnerability Charter is due to be live in November 2020, and will be reflected in the rating from the Q4 2020 release, which will be published in Q1 2021.

Appendix

Table 2: consumer preferred contact methods in Institute of Customer Service survey

		P	referred met	hod of conta	cting supplier			
	In person	Phone	Letter	Email	Website	Арр	Social Media	Web chat
Day to day account management	7%	14%	11%	20%	63%	22%	9%	16%
Information about new tariffs	8%	18%	19%	24%	58%	19%	18%	18%
Supply issues	21%	59%	12%	24%	24%	15%	11%	28%
Bill issues	18%	53%	14%	28%	27%	14%	8%	26%
			Preferred m	ethod of beir	g contacted			
	In person	Phone	Letter	Email	Website	Арр	Social Media	Web chat
Day to day								
account management	6%	15%	14%	41%	35%	16%	8%	11%
	6% 7%	15% 17%	14% 22%	41% 47%	35% 32%	16% 15%	8% 14%	11%
management Information								

Source: ICS Customer Service in the Energy sector – online survey April 2019.

Q9: For each of these reasons, how would you prefer to contact your energy supplier? / Q10. And for each of these reasons, how would you prefer to be contacted by them? (respondents had the option of selecting multiple answers for each reason)

Base: All participants (2063)

Table 3: descriptive data on the number of inbound or customer-initiated contacts as a percentage of total contacts to a supplier (exploratory RFI data)

	Telephone (n=31)	Email (n=30)	Webchat (n=11)	Social media (n=21)	SMS (n=4)	Letter (n=26)
min	0%	1.9%	0.3%	0.1%	0%	0%
max	94.5%	77.0%	24.8%	24.7%	7.2%	1.5%
median	70.7%	22.0%	5.2%	0.7%	0.9%	0.5%
range	94.5%	75.1%	24.6%	24.6%	7.2%	1.5%

Table 4-8: key results from Populus poll on behalf of Citizens Advice

68%

69%

The Populus poll for Citizens Advice surveyed 2,000 people online and 1,000 by telephone (CATI) between 13 and 17 November. Representative sampling across England, Scotland and Wales.

Table 4: Have you contacted your energy supplier (this is referring to supply to your home/domestic property) in the last 3 months?									
	Total	Phone (y)	Online (z)	Mobile only [phone sample]	Prepay meter	Smart Meter			
Yes	31%	32%	30%	32%	30%	35%			

70%

68%

70%

65%

Table 5: How do you normally contact your energy supplier if indeed you do?								
	Total	Phone (y)	Online (z)	Mobile only [phone sample]	Prepay meter	Smart Meter		
Email	32%	24%	36%	26%	26%	31%		
Social media	2%	2%	2%	3%	5%	2%		
Webchat	15%	15%	15%	17%	14%	19%		
Telephone	53%	64%	48%	63%	56%	58%		
I have never contacted my energy supplier	17%	18%	16%	21%	17%	12%		

	Table 6:What is the maximum acceptable response time for queries via email?								
	Total	Phone (y)	Online (z)	Mobile only [phone sample]	Prepay meter	Smart Meter			
Same day	10%	14%	9%	3%	16%	12%			
Next day up to 24 hrs	41%	37%	43%	25%	34%	43%			
Within 48 hrs	30%	18%	34%	25%	36%	28%			
2-3 days	12%	17%	11%	25%	9%	12%			
4-5 days	4-5 days 3% 7%			12%	5%	2%			
More than 5 days	2%	7%	*	10%	-	3%			

Table 7	Table 7: Please rank, in order of importance, the following aspects of an energy supplier's service.										
	How well they handle complaints	Accuracy of bills they provide	Number of bills provided on time	How long they take to switch customers	Suppliers' membership to specific schemes	How long they take to answer the phone	How long they take to respond to emails/ social media/ webchat				
Sum of top three %ages	66%	83%	34%	22%	22%	49%	35%				
First	17%	60%	3%	3%	5%	12%	6%				
Second	27%	14%	17%	8%	7%	18%	12%				
Third	22%	10%	14%	11%	11%	18%	16%				
Fourth	15%	8%	16%	16%	11%	18%	19%				
Fifth	10%	4%	20%	21%	15%	14%	17%				
Sixth	6%	3%	16%	23%	21%	12%	13%				
Seventh	3%	2%	14%	19%	31%	7%	17%				

Table 8: What is the maximum acceptable response time for queries via a direct message through a social media channel?									
	Total	Phone (y)	Online (z)	Mobile only [phone sample]	Prepay meter	Smart Meter			
Within 15 mins	17%	18%	17%	20%	13*	21*			
15-30 mins	22%	11%	27%	14%	10%	15%			
30 mins-1 hr	18%	2%	25%	-	0.44	0.21			
1-2 hrs	8%	2%	11%	-	0.42	0.12			
3-4 hrs	7%	5%	8%	19%	-	26%			
Up to 12 hrs	3%	-	4%	-	-	0.04			
Up to 24 hrs	16%	38%	5%	39%	-	7%			
More than 24 hrs	9%	23%	2%	8%	4%	16%			

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