

Emailed to: RetailStakeholderTeam@ofgem.gov.uk

25 August 2023

Ofgem Consumer Standards Statutory Consultation

Thank you for the opportunity to comment on the Statutory Consultation on Consumer Standards. We think that consulting on changes to improve contact ease, strengthen the advice and support provided to consumers struggling with their bills and enhance the incentives for suppliers to provide good service to their consumers is important for building trust and confidence in the sector.

Improving Contact Ease

We think it is of the highest importance that all consumers, including those who need additional support to be able to contact their supplier in a timely manner. We've received a significant number of complaints where consumers have experienced difficulties contacting their supplier, which supports this being a key area of focus.

We welcome objectives to prioritise consumers in vulnerable circumstances when they require immediate support. We have received complaints from consumers who've not received the support they required. However, it may be difficult to identify and then prioritise consumers in vulnerable circumstances before speaking to them. We therefore think it would make sense to instead focus on ensuring that all calls are consistently answered on a timely basis. This would raise standards overall. We then think suppliers should be required to prioritise those consumers in most need.

We think when assessing supplier performance that Ofgem should consider benchmarking what percentage of calls need to be answered within a specified time rather than using an average time. This would ensure the vast majority of calls are answered in a reasonable period of time, while still recognising that events beyond a supplier's control can sometimes result in longer wait times. Average handling times can sometimes obscure the consumer experience.

We are concerned to hear that some consumers need to call their suppliers outside of opening times. Whilst we've not identified a demand for 24-hour helplines in our complaint data, it's clearly important that if a consumer is off-supply, they have the ability to restore service within a reasonable period of time. But we also recognise that there will be a cost associated with running a 24-hour helpline. Clearly, what support consumers are seeking outside of opening hours will help determine whether a 24-helpline is the right solution.

Extended opening hours beyond 9am – 5pm sound sensible to provide consumers, who work those hours, with access to their supplier. However we think that suppliers would need to determine what will work for their customer base. It is important for consumers to be able to locate their preferred contact method easily, whether this is online or the phone. There are consumers who face financial challenges who need to speak to their supplier; so it seems sensible to offer a free phone line.

Identification and support/advice for those struggling with their bills

We've been concerned to see that in some complaints we've received, suppliers haven't offered consumers payment plans in situations where they're clearly struggling to pay their bills.

We welcome some of the proposals to ensure that is clear when suppliers should be offering support to consumers, and also the support that should be offered. It is also important for Ofgem to ensure that suppliers are consistently following the existing regulation.

Reputational Incentives

We support the requirement for suppliers to publicise the Citizens Advice customer service star rating in a prominent location and in an accessible format for the interim period. It is important to think about where this information is placed so that it adds the most value to consumers when making decisions about their supplier.

We support Ofgem in looking at a longer term measure and will work with Ofgem, Citizens Advice, energy suppliers and other stakeholders to support the development of a robust customer experience measure.

For more information regarding this consultation please contact:

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