

Richard Clay
Ofgem
9 Milbank
LONDON
SW1P 3GE



28 August 2003

Dear Sirs

Re.: IIP Proposed amendments to the RIGs for the speed of telephone response

Thank you for the opportunity to comment on the above paper. We are responding on behalf of EDF Energy. EDF Energy owns the three electricity distribution businesses serving London, Eastern and South-Eastern England:

With respect to the planned changes to the RIGs, EDF Energy Networks Branch are in favour of the aims of Ofgem to ensure a level playing field and a robust IIP telephony statistic recording process. We do, however, have serious concerns on a number of points from which we need urgent clarification from you to ensure the aforementioned aims are achieved:

Boundary between PTO/DNO systems

For both of our telephony systems (one covering SPN and the other EPN/LPN) the boundary between the public telephone system and our systems is drawn incorrectly. As can be seen by the accompanying diagram, both the IVR and MAS are within the public system although they are used by us and are under support contracts. The boundary should be drawn just prior to the queue.

Abandoned calls

We agree that there will be a percentage of calls at D2 which are abandoned by the customer due to length of time waiting for an agent and there is a legitimate need to record and minimise the number of these. However, recording the number of abandoned calls as simply D1 and D2 will also inadvertently record calls where the user has hung up for other reasons. For example, at D1 after partially listening to the IVR, customers may hang up after realising that they have rung the wrong number (e.g. should have called their supplier).

Unsuccessful calls

As the proposals stand, KM7 covers a whole spectrum of calls which we have detailed below:

- The draft RIG defines unsuccessful calls as those that are terminated by the DNO once the call has entered their system. In respect of measure C (unsuccessful calls), as this measuring point is outside our system. It is not possible for us to terminate a call at this point. We need to clarify the measurement of C with you to ensure that we only measure calls over which we have direct control.
- Calls stopped during the announcement – E – these are calls stopped during the optional answering device message. Within the EDF Energy Networks initial IVR callers are given five options: trouble/safety calls and key budget meter faults will automatically be directed into a queue via the “normal” route whereas meter point registration enquiries; account enquiries and general enquiries are passed into a MAS advising them of the correct number to call. Once the customer has heard the appropriate message, the call is automatically terminated. The proposed measure of E will, presumably treat these calls as unsuccessful, whereas the call will have been

EDF Energy plc
Registered in England and Wales
Registered No. 2366582
Registered Office:
40 Grosvenor Place Victoria
London SW1X 7EN

www.edfenergy.com

successfully handled prior to the call being terminated. It is in the customers' interest that these calls are not passed through to an agent as this would unnecessarily add to the number of calls to agents thereby reducing the level of service to genuine trouble and safety calls.

- Calls blocked or flushed – F – this is the true measure of calls terminated by the DNO and is a practice which is not undertaken by any part of EDF Energy Networks in our trouble call centres. We understand that it is something that Ofgem would like to see minimised and which we would also like to see measured separately. This should ensure that the relationship between call fixing and maximum waiting time can be clearly identified.

As a first step we urgently require clarification on the exact definitions of all three component parts to KM7 so we can understand exactly what we are required to measure. It is important to ensure that KM7 does not include calls dealt with to the customers' satisfaction.

Based on our current interpretations, the component parts E and F appear to be in direct contradiction to each other and we believe that this negates the argument for a combined statistic of KM7. In addition to this, the amount of calls which are flushed or blocked has a direct affect on KM5a, KM5b and also KM5c adding weight to the case for KM7 to be split to avoid the supply of misleading statistics.

Depending on the exact definitions and requirements for D1 and E we may be unable to provide disaggregated statistics due to the setup of our IVR and consequently we therefore require urgent clarification on Ofgem's requirements in this area.

Auditing

One of the stated aims of the audit check is to work out how many attempts the average customer takes to contact a DNO using the statistics KM3 and KM7. We are uncertain how these key measures will give the complete picture of the number of times a customer has tried to contact a DNO in view of our above comments over the recording of the statistics.

A further point regarding auditing is a requirement for clarification as to what is actually going to be audited. Is it the systems, recording processes or the formula in paragraph 1.9 of the appendix?

Multiple Measuring Points

For KM2 and KM4 there appear to be two measuring points (L/J and K1/H respectively) for each key measure. Clarification is needed as to what the former point is for (L and K1) on each key measure, when the actual recording for the key measure is done at the latter point (J and H respectively).

Performance Measurement

Our final point for clarification is regarding the planned mechanism for assessment of performance when the incentives come into force in April 2005. We strongly support the use of an absolute target scheme and would welcome discussions on how this is to be implemented.

Conclusions

We would welcome urgent feedback on the above issues due to their complex nature. Depending on the responses, we would then be able to determine whether there are any major technical or contractual changes which would need to be implemented before we could confirm the ability to meet your preferred implementation date of 1st October 2003.

Due to the complexity of the points raised above, we feel that a meeting is imperative to discuss and resolve them and we should be grateful if you would contact us ASAP to arrange this.

If you have any queries on the above feedback please do not hesitate to contact me.

Yours sincerely

Paul Measday
Regulation Analyst

**Atlantic House
Henson Road
Three Bridges
Crawley
West Sussex
RH10 1QQ
01293 509378**