

Mr Richard Clay  
Office of Gas and Electricity Markets  
9, Millbank  
London  
SW1P 3GE

Avonbank  
Feeder Road  
Bristol  
BS2 0TB

Telephone 0117 933 2277  
Fax 0117 933 2428  
Email [bwestlake@westernpower.co.uk](mailto:bwestlake@westernpower.co.uk)

*Our ref*  
497 - 31/07/03

*Your ref*

*Date*  
18 August 2003

Dear Richard

**Information and incentives programme: Proposed amendments to the  
Regulatory Instructions and Guidance for the Speed of telephone response**

This response to the above paper is provided on behalf of Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc. Our comments are separated into general comments on the overall document content and specific comments on the proposed RIG definitions contained in Appendix 1 of the document.

**General Comments On The Document Content**

We support the proposal in the paper that speed of telephone response should be focused on the time that a customer waits to speak to an agent.

WPD operate a telephone system where customers are able to hold to speak to an agent following receipt of a tailored automated fault message. This is described as Generic System Type 1 as described in Figure A1.1 of the proposed amendment to the revised RIGs.

We do not envisage any substantial changes to our system to report the new statistics or anticipate any difficulty in reporting the measures outlined in the document by 1 October 2003. There are some measures where further clarification would be helpful and this is covered in the second section of the document.

We think that it is important that the results reported from the two types of generic telephone system are analysed and published separately. This will confirm (or otherwise) the statement in Section 3.13 that is appropriate to treat the time a customer takes to speak to an agent under Generic System Type 1 as equivalent to the additional time it takes for a customer to call the DNO again on an alternative telephone number to speak to an agent under Generic System Type 2. Our belief is

that the two systems are not comparable and that a system that requires the customer to call the DNO more than once provides a poorer quality of service and is a greater deterrent for a customer who wishes to speak to an agent than a system that allows the customer to achieve his/her objective in one call.

The next important step of the process will be using the reported information to make meaningful comparisons between companies and the introduction of a fair and equitable incentive on speed of telephone response. When using the data for incentive purposes, care will be required to ensure that appropriate behaviors are encouraged. For example an incentive scheme based solely on the speed of telephone response should not be structured to encourage DNOs to disconnect calls to reduce the reported waiting time.

### **Specific Comments on the RIG definitions**

Although the document is clear on the measures that are required, we have identified a few areas in the proposed amendments to the RIGs set out in Appendix 1 of the document where clarification of the definitions would be helpful. This should avoid different interpretation by Companies and hence inconsistencies in the reported data.

These comments are outlined below:

#### **KM1 Total calls on the specified lines**

We believe a better definition of total calls on the specified contact lines would be “a count of all calls presented to the DNO by service provider” as opposed to the suggested “count of all incoming calls on the specified lines”. The count of calls as measured by the service provider is a true count of all calls *sent* to the DNO. A count of incoming calls as measured by the DNO could be interpreted as a count of the calls *received* which may be lower. The point of measurement is critical and adopting a count of calls based on those presented by the service provider will recognize the potential that some calls may be lost before they reach Point A on the diagram. The difference between calls presented by the service provider and calls received are then the total unsuccessful calls identified as C on diagram A1.1 and A1.2.

#### **KM3 Total calls answered by an agent after listening to an automated message providing details of a fault**

This is defined in the narrative as K2 on diagram A1.1 and B2 on diagram A1.2

K2 is a measure of “customers waiting to speak to an agent” as opposed to “calls answered by an agent after listening to an automated message providing details of a fault”

#### **KM4 Total calls answered by an agent**

This is defined in the narrative as K1 on diagram A1.1 and diagram A1.2

For Generic System Type 1 we believe that this should be K1 plus K2

**KM6 Total calls abandoned**

We suggest that this measure should be separately reported as

D1 – calls abandoned during the initial announcement

D2 - calls abandoned whilst waiting to speak to an operator

This will distinguish between customers who abandon because they have dialled the wrong number (D1) and customers who abandon because they are, most likely, dissatisfied (D2).

Finally, we believe there is an error in the audit check identified in 1.9 and the final term is redundant i.e.

Instead of:  $KM1=KM2+KM4+KM6+KM7-KM3a$

It should be:  $KM1=KM2+KM4+KM6+KM7$

I hope these comments are helpful, if you have any further questions please do not hesitate to contact me.

Yours sincerely

R G WESTLAKE  
Regulatory & Government Affairs Manager