



Mr Richard Clay  
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Dear Richard

IIP-Telephone response

Thank you for the chance to comment on your recent consultation. Whilst we welcome the proposal to improve consistency of performance reporting across DNOs, these proposals raise a number of key issues. We believe that these issues require Ofgem to undertake a fundamental re-examination of what it is intending to achieve by developing a measure of speed of telephone response in this way and what is in customers best interests.

**Comments on the proposed amendments to the RIGs**

Our key concern is that, whilst Ofgem have developed a detailed understanding of the different ways in which IVR technology can be used in customer call handling, there does not seem to be an appropriate appreciation of the benefits this technology can deliver for customers. The current proposal focuses on developing a measure of time spent waiting for an agent, which although important, is not the way that information is clearly, usefully and efficiently delivered to the majority of customers. Too great a focus on incentives to connect customers with agents may overlook the need to incentivise investment in modern technology that enables companies to deliver useful messages to the maximum number of customers in a timely manner.

We are also concerned that Average Speed of Response (ASR) is not a robust measure, as it does not necessarily provide the true picture of performance that enables meaningful comparison. For example, two DNOs may have an ASR of 25 and 30 seconds respectively. However, the first DNO may answer all of its calls between 20 and 60 seconds, whilst the second DNO could answer 85% in 15 seconds, 10% in 20 seconds and 5% in 305 seconds. It is not clear which DNO would have the best performance as the majority of customers of the second DNO will likely receive a better rating for speed of answer – despite contrary indications from an ASR measure.

Furthermore, as the measure only looks at how long it takes for a customer to speak to a physical agent, rather than an automated service, it is potentially open to inappropriate

manipulation. For example, teams of agents taking brief details of calls and arranging for the customer to be called back could easily influence this. Depending on the nature of the enquiry, this may then facilitate a call back containing 'positive' news, also having an affect on the quality of response measure.

Additionally, as the proposal states that where the initial call is terminated and the customer asked to call back the speed of response time is taken from the end of any further IVR/group announcement type message. Messages of varying lengths, which are interruptible when an agent becomes available, could be used to measure waiting time and prevent true comparisons from being made.

Therefore, our recommendation is that all answered calls whether by message facility or agent should be included in the DNO performance comparison. Key focus should be given to calls that are answered promptly and provide customers with the information they need.

ASR will need significant development to ensure that it is acceptable as a comparative measure of performance. Unless 100% integrity in the data provision can be proven, financial measures either positive or negative should not be introduced. If financial measures can not be brought in with confidence immediately we suggest that as an initial step Ofgem could clearly publish company performance in this area in their annual Quality of Supply report.

There is also no clarity as to whether exceptional circumstances are to be included or removed from the data. If the messaging facility is optimally used by a DNO to keep costs down, any exceptional events where the volume of customers requiring an agent suddenly increases, could cause a dramatic reduction in that DNOs performance against the measure. We recommend that, as with other IIP measures, a robust mechanism for identifying and excluding the effects of exceptional events is included in the RIGs.

### **Comments on timing of the proposed changes**

We believe that the October 1<sup>st</sup> is an achievable time-scale for launch of the measure Ofgem are proposing, but that it would be inappropriate to introduce such a methodology. Instead, Ofgem should consult further on developing a measure of prompt and useful information provision.

### **Feasibility of using existing systems to provide new statistics**

We believe that all the data required is available from our current systems subject to some manual intervention and validity testing.

I would be very happy to discuss any of the points raised in this letter, please contact me if you have any questions.

Yours sincerely

**Paul Bircham**  
**Electricity Regulation Manager**