

Our ref :
Your ref :

Richard Clay
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Dear Richard

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

East Midlands Electricity welcomes the opportunity to make comment on Ofgem's consultation regarding the IIP speed of telephone response scheme.

EME believes that it is important to ensure consistency in IIP reporting.. Therefore it is essential that this second phase of IIP telephony reporting addresses the previous inconsistencies of reporting where companies operate different telephony systems and where different interpretation of the RIG has occurred.

In order to achieve a robust reporting system and common interpretation of the RIG across DNOs, we believe that the introduction of revised RIG from the 1st April 2004 would be more appropriate. These timescales would not only allow Ofgem to feed back to DNOs responses to any questions raised through this consultation process (possibly through a workshop or via the DRMM), but also for DNOs to be able to implement any changes to their systems and to fully test these prior to the commencement of reporting via the revised RIG.

This would ensure that the robustness of the reporting process is in place before the figures are reported via the IIP / quality of supply process to consumers. Furthermore, reporting could be tailored to ensure that the information passed to consumers is appropriate, useful and set in correct context being both informative and useful in it's delivery.

With regards to paragraph 3.6, EME considers that bespoke messages used to groups of customers deliver far higher levels of customer service. In these instances there has to be a balance between the time taken to update messages with the levels of service that can be provided in delivering accurate yet timely information to our customers.

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With regards to figure 3.3 and Figure A1.2, we believe that the diagrams are incorrect as they do not include the research messages that companies use to inform customers that their details may be used for Ofgem sampling purposes.

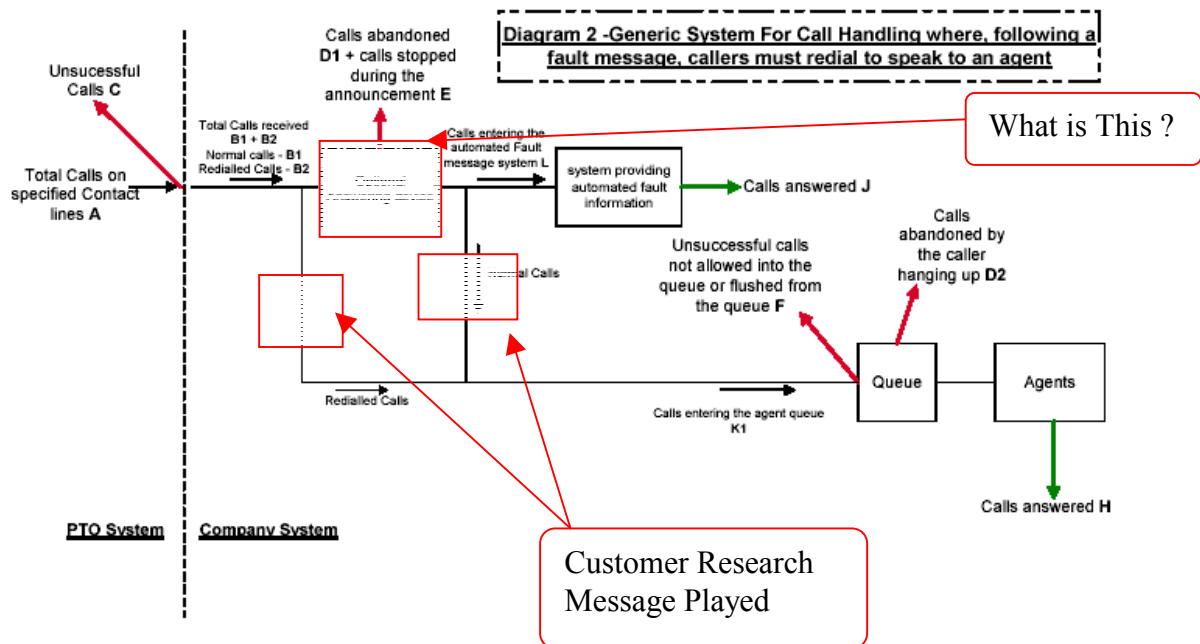
In respect of paragraph 1.8 (Appendix 1) we would like clarification as to, why measuring the number of attempts to gain information is a relevant measure, since the decision to make calls subsequent to the first is a customer choice , as I have outlined above EME give bespoke messages through the MAS and any additional call is by choice made by the customer to give or receive further information to or from EME.

Key Measure Proposals

Figure A1.2

We would seek clarification as to the definition of the optional answering device included on the company system. Is the optional answering device the IVR group announcement as shown in figure 3.3.

The EME diagram should include two additional boxes as we have marked in red on a copy of figure A1.2 below. These boxes indicate where customers will have a message played to them indicating that their details may be used for customer research purposes :-



KM1

We would seek further clarity here on the definition of unsuccessful calls, our interpretation is that in this context these would be calls that are disconnected / engaged at point C as the call hits the PTO plus calls flushed at point (Point f) and abandoned at points D1 & D2. Please note it is not the policy of East Midlands Electricity to flush calls.

KM2

EME believes that their current systems would give the information required to be able to report for Key Measure 2.

KM3

Within the options for KM3 EME would report under KM3b where customers would redial an alternative number after listening to an automated message. EME believes that their current systems would give the information required to be able to report for Key Measure 3b.

KM4

EME believes that their current systems would give the information required to be able to report for Key Measure 4

KM5

EME believes that their current systems would give the information required to be able to report for key measures KM5a and KM5b, a system modification is required to report under KM 5c

KM5c – We do not believe that measure KM5c proposed by Ofgem for the maximum time queuing gives a true indication of the service level provided by a company under IIP. We believe that this measure has the potential to distort customer opinion by not showing a true reflection of a company's performance across all customer calls, and believe that KM 5b already deals with assessing the levels of telephony service.

KM6

EME believe that their current systems would give us the information required to be able to report on calls abandoned at D2. We would seek further clarity on calls at point D1 & E. EME are unable to capture calls that are abandoned during the announcement.

KM7

EME are awaiting further clarity on the points raised above in order to define if our systems can capture this information.

We believe that modifications to EME's ACD system in order to facilitate the revised IIP RIG would take 5 days to implement and the associated cost of this modification would be approximately £3250.

Although the consultation does not seek to comment on the October Storms the consultation does reference the DTI recommendations that DNOs should be delivering an appropriate telephony service to their customers. EME has reviewed their systems in light of the DTI report with an internal review having been completed and the contract with BT having been significantly strengthened, the system was tested again in January with blizzard conditions in Lincolnshire, after which we received not a single complaint regarding the customer telephony systems.

We would also like to re-iterate that IIP focuses purely on the 32% of customers that we speak to and does not account for the 68% of customers that we satisfy by the use of the MAS system.

As always, if you would like to discuss any of the information provided further or to meet with EME regarding the information provided, please do not hesitate to contact me on 01332 39 3090.

Yours sincerely,

James Hawkins
Regulatory Analyst

