British Gas

by e-mail
Richard Clay
OFGEM
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29th August 2003

Dear Richard,

British Gas welcomes the opportunity to comment on the document entitled 'IIP: Proposed amendments to the Regulatory Instructions and Guidance for the speed of telephone response'. We support the proposal to introduce performance measures. A lack of sufficient performance on behalf of the Distribution Network Operator (DNO) in major outages leads to increased call volumes in suppliers call centres and can lead to a corresponding drop in supplier call handling performance.

Previously we have attempted to assist in alleviating this problem by contacting DNOs to agree an appropriate way forward, however, to date, we have received little response from all but one DNO.

We welcome the proposal to introduce new performance measures and have some comments on other performance measures that we believe will identify customers who may not be receiving an adequate level of service.

Speed of Response

The main concern for suppliers and customers when considering speed of response for DNO businesses is when outages occur. When this covers a large number of customers or continues for a prolonged period of time such as those incidents during the winter, this can lead to a large number of calls. This causes two problems

- Large numbers of calls can lead to an increased waiting time for customers;

- Many calls can overload either the distribution businesses telephony system or BT’s system (as was the case recently) meaning customers simply cannot get through.

Apparent failure to respond by the DNO encourages overflow to suppliers. Swamping a suppliers call centres with calls related to the outage means that all other calls regarding normal supplier business are affected, so even customers who are not directly affected by the outage, such as those calling to provide a meter reading or notify us of a change of tenancy, could find themselves suffering from reduced customer service and extended call waiting times.

We suggest that DNOs should have contingency arrangements for this situation, for example, additional call handlers available at relatively short notice. Indeed, British Gas wrote to all DNOs recently suggesting a process should be set up whereby suppliers are notified as soon as possible of a major incident by the DNO, we have included our proposed template as an attachment. This would enable suppliers to keep their staff updated on the events so customers who do call their supplier can receive the same message that the DNO IVR would give out. This would mean that a consistent message is being provided to the customer and would alleviate pressure on the DNOs telephony systems. From a supplier point of view it would also mean that business as usual and customers with other queries would not be affected. Unfortunately only one DNO (Aquila) has to date put in a process whereby suppliers are proactively provided with the necessary information.

This is the case in the gas industry. When we are advised of a gas supply emergency we take steps to inform our Customer Service Advisors so when customers call we can provide them with the latest information on the situation. Industry exercises are undertaken on a regular basis with suppliers and shippers to determine if the plans in place are sufficiently effective.

British Gas has been made aware by its customers that they experience great difficulty in contacting the DNOs and in obtaining current and accurate information on the supply interruptions in their area and the progress in restoring supplies to their property. Putting in place an industry process whereby DNOs advise and update suppliers of incidents would allow us to offer the same level of service to our electricity customers and would most likely relieve some of the pressure on DNO call centres. However it is essential to ensure that recorded messages on DNO telephony systems are kept accurate and up to date and that suppliers are also provided with this information in a timely manner.

Performance Measures

British Gas agrees that all the measures set out in Appendix 1 of Ofgem’s consultation would give suppliers, customers and Ofgem a good indication of how distribution businesses are performing.
Further measures that would give an indication of performance are set out below:

- Speed of answer of the IVR fault message line. This would impact suppliers if many customers were calling the fault service and this lead to a wait to actually hear the message. In this situation customers could loose patience and call their supplier.

- Customers receiving the engaged tone or no tone at all. If not enough lines are available or the line utilisation thresholds are exceeded, more customers would receive the engaged tone or no tone at all, yet the performance measures set out could still indicate a good performance. The number of customers receiving an engaged tone or no tone at all should also be reported and this should be separate from ‘unsuccessful calls’.

- Note taking. In severe cases of large call volumes note taking can be used to reduce the time each call takes, however this requires strict procedures to ensure all notes are recorded and customer issues are resolved when call volumes subside. DNOs should also be required to comment on how many occasions note taking was deployed to cover call traffic peaks and the duration for which it was necessary.

Reporting

There is no indication in the consultation of the time periods over which the performance will be measured. Since the call traffic to DNOs would seem likely to fluctuate significantly, we would suggest that monthly or quarterly reporting should be used. Major incidents are likely to affect the figures significantly and DNOs may wish to report ‘business as usual’ response speeds separately from ‘peak times’.

We hope these points have been useful. If there are any questions on any of the points raised in this letter, please do not hesitate to contact me on my direct line 0208 734 9351 or my mobile 07979 567717.

Yours sincerely,

Alison Beard
Regulatory Issues Manager